

● **VENTBOM APP PRIVACY POLICY**

PRIVACY POLICY APP WEB

By means of this Privacy Policy we inform you about how we collect and treat your personal data when you register and use our web app.

1. APPLICABLE LEGISLATION.

- Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data and repealing Directive 95/46/EC (General Data Protection Regulation).
- Organic Law 3/2018, of December 5, on Personal Data Protection and guarantee of digital rights.
- Law 34/2002, of July 11, 2002, on information society services and electronic commerce.

2. WHO IS RESPONSIBLE FOR THE PROCESSING OF THE DATA YOU PROVIDE THROUGH THE WEB APP?

The person responsible for the treatment of your data is DINAK, S.A., with NIF A36948438, address Camiño Do Laranxo, 19, 36216, Vigo (Pontevedra) Spain, telephone 986452526 and e-mail dinak@dinak.com.

3. WHAT INFORMATION IS REQUIRED TO USE THE DIFFERENT FUNCTIONALITIES OF THE WEB APP?

In order to make use of the services offered we will ask you to register beforehand. Through this registration we will ask you for the following information:

Name and surname
Email
Phone
City
Zip Code
Sector
Company
Position

4. WHAT DATA IS OPTIONAL?

The registration data are mandatory to access the platform, without them you will not be able to use the service. In relation to the platform itself it is not mandatory to incorporate any personal data.

5. WHAT ARE THE PURPOSES AND THE BASES OF LEGITIMACY FOR THE PROCESSING OF YOUR DATA?



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According to the different sections of the app we may treat your data for the following purposes:

5.1 Management of the contractual relationship. We may process your data for this purpose because a contractual relationship exists.

5.2 Information system security management. We may process your data for this purpose because there is a legal obligation set out in Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 and other applicable legislation.

6. HOW LONG WILL WE KEEP YOUR DATA?

The data will be kept for the time strictly necessary to achieve each of the purposes indicated and, duly blocked, during the period of limitation of the legal actions that may arise.

7. IS IT MANDATORY TO PROVIDE US WITH YOUR DATA?

Your data are necessary to provide you with the services offered through the web app, without them it will not be possible to process.

8. TO WHOM WILL YOUR DATA BE COMMUNICATED?

a) Data necessary for the collection/crediting of indemnities or for the exercise or defense of claims shall be communicated to insurance and reinsurance companies, insurance and reinsurance brokerage firms, courts and tribunals.

b) Your data will be communicated to our data processors when necessary for the proper provision of the services contracted to them.

Should it be necessary to notify you of any other communication of data, you will be notified in advance.

9. WILL YOUR DATA BE TRANSFERRED TO THIRD COUNTRIES?

On the occasion of the hosting of the web application on servers subcontracted by VentBOM, LLC with IONOS Cloud S.L.U. an International Transfer of your data to the U.S.A. may occur. These transfers will be made under standard contractual clauses and, counting the subcontractor at technical and organizational level with ISO 27001. More information can be found at [Privacy Policy | IONOS Group SE \(ionos-group.com\)](#).

10. WHAT ARE YOUR RIGHTS WHEN YOU PROVIDE US WITH YOUR DATA?

- Access: the right to obtain confirmation as to whether or not we are processing your personal data, to know what it is, what it is used for, how long it will be kept, the origin of the data and whether it has been or will be communicated to a third party.



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- Rectification: the right to request the rectification of inaccurate data and the completion of incomplete personal data.
- Deletion: the right to request the deletion of personal data when they are inadequate, excessive or no longer necessary for the purposes for which they were collected, including the right to be forgotten.
- Opposition: the right to object, in certain circumstances, to the processing of your personal data or to request that the processing be stopped.
- Limitation of Processing: the right to request, in the legally established circumstances, that your data not be processed beyond the mere conservation of the same.
- Portability: the right to receive your personal data in a structured, commonly used and machine-readable format, and to be able to transmit it to another data controller, whenever technically possible.

11. HOW CAN YOU EXERCISE YOUR RIGHTS?

You may exercise your rights by writing to Camiño Do Laranxo, 19, 36216, Vigo (Pontevedra) Spain or by e-mail to dinak@dinak.com. DINAK, S.A. makes available models for the exercise of rights that can be obtained at the address or through the email address indicated above. For further information: www.aepd.es.

12. DO YOU HAVE THE RIGHT TO FILE A COMPLAINT WITH THE SUPERVISORY AUTHORITY?

In the event that your rights have not been respected, you can file a complaint by writing to the Spanish Data Protection Agency located at Calle Jorge Juan, 6-28001-Madrid or use the electronic headquarters: <https://sedeagpd.gob.es>. In both cases, you must attach the relevant documentation.