

PRIVACY POLICY

Triple Sustainability is fully committed to complying with Spanish and European personal data protection regulations and ensuring full compliance with the obligations set forth, as well as implementing the security measures detailed in the General Data Protection Regulation (GDPR) (EU) 2016/679, of 27th April, and Law 3/2018, of 5th December, on Data Protection and Digital Rights (LOPD and GDD, hereinafter LOPD).

Pursuant to these regulations, you are hereby informed that use of our website may require that certain personal data be collected through contact forms, or by sending emails, that will be processed by Triple Sustainability, the Data Controller, whose information is as follows:

- **Company Name:** Triple Sustainability, S.L.U.
- **Trade Name:** Triple Sustainability
- **Tax ID Number:** B05371174
- **Registered Office:** C/ Valle De Bergantiños, 8, Planta 5, Puerta A - 28039, Madrid, Spain
- **Telephone:** +34 628 200 421
- **Email:** juan.ramon.miguel@3sustainability.com

Collection and processing of personal data

Personal data is any information concerning a person: name, email address, postal address, telephone number, tax ID number, etc. Additionally, when the User visits our website, certain information is automatically stored for technical reasons, such as the IP address assigned by the User's internet service provider.

Triple Sustainability, as the Data Controller, must suitably inform Users of this website about the collection of personal data that may be carried out, either by sending an email or by filling in the forms included on the site.

Only the data necessary to perform the hired service, or to be able to respond appropriately to the request for information made by the User, will be obtained. The data collected are identification data and they correspond to a reasonable minimum required to carry out the activity requested. Specifically, no specially protected data is collected at any time. Under no circumstances will Triple Sustainability use the data obtained for purposes different to the purpose agreed with the User.

Contact form/email address

Purpose: To respond to the User's request for information made through our contact form/s.

Legitimation: The legal basis that legitimises this form of processing is the User's consent, which may be withdrawn at any time.

Data transfer: [GoDaddy](#) will process data through its servers; it will do so as the Data Processor.

Minimum age restriction

Only people over the age of 14 may provide personal data on this website. As required by the Organic Law on Data Protection and Guarantee of Data Rights, in the case of minors under 14 years of age, the consent of their parents or guardians will be a compulsory condition for us to process their personal data.

On the other hand, only people over 18 years old can hire our services. In the case of minors under 18 years of age, the consent of their parents or legal guardians will be a mandatory condition for us to provide the services offered, unless the minor is emancipated.

Security measures

Triple Sustainability hereby informs Users that the necessary technical, organisational and security measures available to us have been taken to prevent the loss, misuse, alteration, unauthorised access or theft of data, and thus guarantee the confidentiality, integrity, and quality of the information contained therein, in accordance with data protection regulations in force. The personal data collected using forms are processed only by the staff of Triple Sustainability or by the designated Data processors.

The Triple Sustainability website also has SSL encryption, which allows Users to safely send their data using the website's contact forms.

Veracity of data

The User states that all data they provide are true and correct, and they agree to keep them up to date. The User will be responsible for the

truthfulness of their data and will be solely liable for any conflicts or disputes that may result from their falsification. It is essential that, for us to keep personal data up to date, the User informs Triple Sustainability whenever there has been any modification to their data.

Data Transfer

"Triple Sustainability" will not transfer or communicate to any third party your data, except in the cases legally provided or where the provision of a service implies the need for a contractual relationship with a Processor. The User accepts that some of the personal data collected will be provided to these Data Processors (payment platforms, processing agencies, intermediaries, etc.), when it'll be necessary for the effective performance of a contracted service or product acquired. The User also agrees that, in the event of the provision of services, these may be, in whole or in part, subcontracted to other persons or companies, which will be considered as Data Processors, with which the corresponding contract of confidentiality, or adhered to their privacy policies, set out on their respective websites. The User may refuse the transfer of his/her data to the Data Processors, by written request, by any of the means mentioned above.

In addition, where necessary, the data of Clients may be transferred to certain agencies, in compliance with a legal obligation: Spanish Tax Agency, banks, Labour Inspectorate, etc.

How a User can exercise their rights

The LOPD and the GDPR grant interested parties the option of exercising several rights related to processing of their data. To do so, the User must contact us, providing a copy of documentation proving their identity (ID card or passport), by email sent to juan.ramon.miguel@3sustainability.com, or by written communication sent to the address provided in our Legal Notice. This request should also include the following information: User's name and surname, request, address, and supporting data.

The User must exercise these rights himself/herself. However, they may also be exercised by a person authorised as the User's legal representative, when documentation attesting to such representation is provided.

The User may exercise the following rights:

- The right to **access** personal data, which is the right to obtain information on whether their data is being processed, the purpose of any processing that is being developed, as well as the information available on the origin of such data and the communications made or planned thereof.
- The right to **rectification**, where personal data are incorrect or inaccurate. The User may also request that data found to be inadequate or excessive be **erased**.
- The right to request a **restriction of processing** their data, in which case said data will only be retained by Triple Sustainability to exercise or defend claims.
- The right to **object**: User has the right to request that their data not be processed or that processing be ceased in cases where their consent is not necessary for processing. Users may oppose commercial prospecting files or decisions related to the person concerned that are based solely on automatic processing of their data, unless further processing is required for legitimate reasons or to exercise or defend potential claims.
- The right to data **portability**: if the User would like their data to be processed by another company, Triple Sustainability will provide the User with a portable copy of their data in an exportable format.

If the User grants consent for a specific purpose, **they have the right to withdraw this consent at any time**, without affecting the lawfulness of processing based on consent before its withdrawal.

We are committed to enforcing all these rights within the maximum legal deadline of 1 month.

If the User believes there is an issue with how Triple Sustainability processes their data, they can contact our data protection officer or the appropriate data protection authority. The Spanish Data Protection Agency (AEPD) is the control authority in Spain.

Data retention

Requested information of Users' personal data collected by contact form or by email will only be used strictly during the time necessary to fulfil the request for information, or until consent is withdrawn.

Customers' personal data will be processed until the end of the contractual relationship. The particular data retention period shall be the minimum necessary, and it may be maintained for:

- Four years: Law on Social Infringements and Sanctions, related to obligations in matters of affiliation, contributions, payment of wages; Arts. 66 et seq. General Tax Act (accounting).
- Five years: Art. 1964 of the Civil Code (personal actions without special deadline).
- Six years: Art. 30 of the Commercial Code, related to accounting records and invoices.
- Ten years: Art. 25 of the Law on the Prevention of Money Laundering and Financing of Terrorism.
- No term: disaggregated and anonymised data.

In the case of candidates' data processing (CVs), Triple Sustainability may store CVs for up to two years and refer to them in future job vacancies, unless the candidate states otherwise.

Social networks

Triple Sustainability has profiles on some of the world's major social networks (LinkedIn, Twitter), identifying itself in all cases as Data Controller processing the data of its followers, fans, subscribers, commentators and other user profiles (hereinafter, followers) published by Triple Sustainability.

The purpose of data processing by Triple Sustainability, when not prohibited by law, will be to inform its followers of its activities and offers, in any way that the social network allows, as well as providing a personalised user care service. The legal basis for such processing shall be the consent of the person concerned, which may be withdrawn at any time.

Under no circumstances will Triple Sustainability obtain data from social networks, unless the User grants their consent in this regard (for example, to hold a contest).

International data transfer

Triple Sustainability uses the services of hosting service company [GoDaddy](#), which is in the United States. Standard contractual clauses

approved by the European Commission have been signed with this entity, to ensure the appropriate level of protection in the processing of your personal data, in accordance with the criteria established by RGPD.

Staff recruitment

An applicant who sends electronic communications to Triple Sustainability applying for a job authorises us to analyse the following: the documents sent (for example, their CV), all content that is directly accessible via internet search engines (for example, Google), profiles that they have on professional social networks (for example, LinkedIn), data obtained from access testing, and the information they disclose in the job interview. Using all of this information, we will evaluate their candidacy and may be able to offer them a job when a position becomes available. If the candidate is not selected, Triple Sustainability may store their CV for a maximum of two years so they may be considered in future vacancies, unless the candidate states otherwise. The legal basis for such processing shall be the consent of the person concerned, which may be withdrawn any time.

Confidentiality

The information supplied by the User shall, in any case, be regarded as confidential and may not be used for purposes other than those described herein. Triple Sustainability is obliged to refrain from disclosing information about the User's claims, the reasons for the information requested, or the duration of its relationship with the User.

Term of validity

This privacy and data protection policy has been drafted by EXPERTOSLOPD®, [a data protection company](#), on May 03rd, 2023. It may vary depending on changes in regulations and jurisprudence. It is the responsibility of the data holder to read the updated document in order to understand their rights and obligations in this regard at any time.