



PRIVACY AND DATA PROTECTION POLICY

PURPOSE STATEMENT

Comercial Escolà S.L. (hereinafter also referred to as the APP) is committed to protecting and maintaining the privacy and confidentiality of its students and/or contestants, staff, and customer's personal information in line with RGDP EU legislation ((EU) 2016/679). Comercial Escolà S.L. complies with

- The Organic Law 3/2018 of December 5 on Protection of Personal Data and Guarantee of Digital Rights (LOPD-GDD)

The purpose of this Privacy and Data Protection Policy is to:

- Clearly communicate the personal information handling of Comercial Escolà S.L.
- Give all Comercial Escolà S.L. stakeholders and other individuals a better understanding of the sort of personal information that Comercial Escolà S.L. holds
- Enhance the transparency of Comercial Escolà S.L.'s operations

SCOPE

This policy encompasses all Comercial Escolà S.L.'s electronic and hard copy versions of students and/or contestants, staff and customer records. Comercial Escolà S.L. will ensure a secure and effective information management system exists within the APP to support the processes of



communication, data storage, retrieval to enable the privacy and confidentiality of students and/or contestants, staff and customers records

POLICY STATEMENT

This policy focuses on Comercial Escolà S.L.'s commitment to protecting the privacy of its students and/or contestants, staff and customers and outlines the various ways in which it ensures this protection.

Unless we link to a different policy or state otherwise, this Privacy and Data Protection Policy applies when you visit or use the Comercial Escolà S.L. and Magatzem Escolà websites, mobile applications, APIs, or related services provided by the APP. It also applies to prospective customers of our business and enterprise products.

By using the Services, you agree to the terms of this Privacy and Data Protection Policy. You shouldn't use the Services if you don't agree with this Privacy and Data Protection Policy or any other agreement that governs your use of the Services.

WHAT DATA WE GET

We collect certain data from you directly, like information you enter yourself, data about your consumption of content, and data from third-party platforms you connect with Comercial Escolà S.L.. We also collect some data automatically, like information about your device and what parts of APP Services you interact with or spend time using.

DATA YOU PROVIDE TO US



We may collect different data from or about you depending on the use you make of the APP content. Below are some examples to help you better understand the data we collect.

When you create an account and access the APP content, including through a third-party platform, we collect any data you provide directly, including:

Account Data: in order to use certain features (like accessing content), you need to create a user account which requires us to collect and store your email address, password, and account settings. As you use certain features on the site, you may be prompted to submit additional information including occupation, ID information, verification photo, date of birth, race/ethnicity, skill interests, and phone number. Upon account creation, we assign you a unique identifying number.

Profile Data: you may also be requested to provide profile information like a photo, headline, biography, language, website link, social media profiles, country, or other data. Your Profile Data will be publicly viewable by others.

Shared Content: parts of the APP let you interact with other users or share content publicly, including by posting reviews about content, asking or answering questions, sending messages to students or educators, or posting photos or other work you upload. Such shared content may be publicly viewable by others depending on where it is posted.

Educational Content Data: when you access content, we collect certain data including which courses, assignments, labs, workspaces, and quizzes you've started and completed; content purchases and credits; subscriptions; completion certificates; your exchanges with educators, teaching assistants, and other students; and essays, answers to questions, and other items submitted to satisfy course and related content requirements. If you are an educator, we store your educational content which may contain data about you.



Student Payment Data: if you make purchases, we collect certain data about your purchase (such as your name, billing address, and postal code) as necessary to process your order and which may optionally be saved to process future orders. You must provide certain payment and billing data directly to our payment service providers, including your name, credit card information, billing address, and postal code. We may also receive limited information, like the fact that you have a new card and the last four digits of that card, from payment service providers to facilitate payments. For security, Comercial Escolà S.L. does not collect or store sensitive cardholder data, such as full credit card numbers or card authentication data.

Data About Your Accounts on Other Services

We may obtain certain information through your social media or other online accounts if they are connected to your Comercial Escolà S.L. account.

Those platforms and services make information available to us through their APIs. The information we receive depends on what information you (via your privacy settings) or the platform or service decide to give us.

If you access or use Comercial Escolà S.L. through a third-party platform or service, or click on any third-party links, the collection, use, and sharing of your data will also be subject to the privacy policies and other agreements of that third party.

Sweepstakes, Promotions, and Surveys

We may invite you to complete a survey or participate in a promotion, either through the APP or a third-party platform. If you participate, we will collect and store the data you provide as part of participating, such as your name, email address, postal address, date of birth, or phone number. That data is subject to this Privacy and Data Protection Policy unless otherwise stated in the official rules of the promotion or in another Privacy and Data Protection Policy. The data collected will be used to administer the promotion or survey, including for notifying winners and distributing rewards. To receive



a reward, you may be required to allow us to post some of your information publicly (like on a winner's page). Where we use a third-party platform to administer a survey or promotion, the third party's Privacy and Data Protection Policy will apply.

COMMUNICATIONS AND SUPPORT

If you contact us for support or to report a problem or concern (regardless of whether you have created an account), we collect and store your contact information, messages, and other data about you like your name, email address, messages, location, Spirit Essence user ID, refund transaction IDs, and any other data you provide or that we collect through automated means (which we cover below). We use this data to respond to you and research your question or concern, in accordance with this Privacy and Data Protection Policy.

The data listed above is stored by us and associated with your account.

DATA WE COLLECT THROUGH AUTOMATED MEANS

When you access Comercial Escolà S.L. (including browsing content), we collect certain data by automated means, including:

System Data: technical data about your computer or device, like your IP address, device type, operating system type and version, unique device identifiers, browser, browser language, domain and other systems data, and platform types.

Usage Data: usage statistics about your interactions with Comercial Escolà S.L., including content accessed, time spent on pages or the APP content,



pages visited, features used, your search queries, click data, date and time, referrer, and other data regarding your use of the Services.

Approximate Geographic Data: an approximate geographic location, including information like country, city, and geographic coordinates, calculated based on your IP address.

The data listed above is collected through the use of server log files and tracking technologies, as detailed in the *Cookies and Data Collection Tools* section below. It is stored by us and associated with your account.

DATA FROM THIRD PARTIES

If you are a Comercial Escolà S.L. Business enterprise or corporate prospect, in addition to information you submit to us, we may collect certain business contact information from third-party commercial sources.

HOW WE GET DATA ABOUT YOU

We use tools like cookies, web beacons, and similar tracking technologies to gather the data listed above. Some of these tools offer you the ability to opt out of data collection.

COOKIES AND DATA COLLECTION TOOLS

We use cookies, which are small text files stored by your browser, to collect, store, and share data about your activities across websites, including on Comercial Escolà S.L.. They allow us to remember things about your visits to Comercial Escolà S.L., like your preferred language, and to make the site easier to use. To learn more about cookies, visit



<https://www.aepd.es/es/documento/guia-cookies.pdf>. We may also use clear pixels in emails to track deliverability and open rates.

Comercial Escolà S.L. and service providers acting on our behalf (like Google Analytics and third-party advertisers) use server log files and automated data collection tools like cookies, tags, scripts, customized links, device or browser fingerprints, and web beacons (together, “Data Collection Tools”) when you access and use the APP content. These Data Collection Tools automatically track and collect certain System Data and Usage Data (as detailed in Section *What Data We Get*) when you use Comercial Escolà S.L.. In some cases, we tie data gathered through those Data Collection Tools to other data that we collect as described in this Privacy and Data Protection Policy.

WHY WE USE DATA COLLECTION TOOLS

Comercial Escolà S.L. uses the following types of Data Collection Tools for the purposes described:

Strictly Necessary: These Data Collection Tools enable you to access the site, provide basic functionality (like logging in or accessing content), secure the site, protect against fraudulent logins, and detect and prevent abuse or unauthorised use of your account. These are required for Comercial Escolà S.L. to work properly, so if you disable them, parts of the site will break or be unavailable.

Functional: These Data Collection Tools remember data about your browser and your preferences, provide additional site functionality, customize content to be more relevant to you, and remember settings affecting the appearance and behaviour of the APP contents (like your preferred language or volume level for video playback).

Performance: These Data Collection Tools help measure and improve the APP content by providing usage and performance data, visit counts, traffic



sources, or where an application was downloaded from. These tools can help us test different versions of Comercial Escolà S.L. to see which features or content users prefer and determine which email messages are opened.

Advertising: These Data Collection Tools are used to deliver relevant ads (on the site and/or other sites) based on things we know about you like your Usage and System Data (as detailed in Section *What Data We Get*), and things that the ad service providers know about you based on their tracking data. The ads can be based on your recent activity or activity over time and across other sites and services. To help deliver tailored advertising, we may provide these service providers with a hashed, anonymised version of your email address (in a non-human-readable form) and content that you share publicly on the Services.

Social Media: These Data Collection Tools enable social media functionality, like sharing content with friends and networks. These cookies may track a user or device across other sites and build a profile of user interests for targeted advertising purposes.

You can set your web browser to alert you about attempts to place cookies on your computer, limit the types of cookies you allow, or refuse cookies altogether. If you do, you may not be able to use some or all features of Comercial Escolà S.L., and your experience may be different or less functional. To learn more about managing Data Collection Tools, refer to Section *Your Choices About the Use of Your Data* below.

WHAT WE USE YOUR DATA FOR

We use your data to do things like provide our Comercial Escolà S.L., communicate with you, troubleshoot issues, secure against fraud and abuse, improve and update our Services, analyse how people use Comercial Escolà S.L., serve personalized advertising, and as required by law or necessary for



safety and integrity. We retain your data for as long as it is needed to serve the purposes for which it was collected.

We use the data we collect through your use of Comercial Escolà S.L. to:

- Provide and administer Comercial Escolà S.L., including to facilitate participation in educational content, issue completion certificates, display customized content, and facilitate communication with other users;
- Process payments to Comercial Escolà S.L. and other third parties;
- Process your requests and orders for educational content, products, specific services, information, or features;
- Communicate with you about your account by:
 - Responding to your questions and concerns;
 - Sending you administrative messages and information, including messages from educators, students, and teaching assistants; notifications about changes to our Service; and updates to our agreements;
 - Sending you information, such as by email or text messages, about your progress in courses and related content, rewards programs, new services, new features, promotions, newsletters, and other available educator-created content (which you can opt out of at any time);
 - Sending push notifications to your wireless device to provide updates and other relevant messages (which you can manage from the “options” or “settings” page of the mobile app);
- Manage your account and account preferences and personalise your experience;
- Facilitate Comercial Escolà S.L. technical functioning, including troubleshooting and resolving issues, securing Comercial Escolà S.L., and preventing fraud and abuse;
- Verify the identity of educators;



- Solicit feedback from users;
- Market products, services, surveys, and promotions;
- Subscription Plans to prospective clients;
- Learn more about you by linking your data with additional data through third-party data providers and/or analysing the data with the help of analytics service providers;
- Identify unique users across devices;
- Tailor advertisements across devices;
- Improve our services and develop new products, services, and features;
- Analyse trends and traffic, track purchases, and track usage data;
- Advertise Comercial Escolà S.L. on third-party websites and applications;
- As required or permitted by law; or
- As we, in our sole discretion, otherwise determine to be necessary to ensure the safety or integrity of our users, employees, third parties, the public, or our Services.

WHO WE SHARE YOUR DATA WITH

We share certain data about you with educators, other students, companies performing services for us, Comercial Escolà S.L. affiliates, our business partners, analytics and data enrichment providers, your social media providers, companies helping us run promotions and surveys, and advertising companies who help us promote our Services. We may also share your data as needed for security, legal compliance, or as part of a corporate restructuring. Lastly, we can share data in other ways if it is aggregated or de-identified or if we get your consent.



We may share your data with third parties under the following circumstances or as otherwise described in this Privacy and Data Protection Policy:

WITH WSET

Specific personal data is shared with WSET for the purpose of exam enrolment, results and certification (Full name, Date of Birth, Email Address) and that WSET holds this data in line with their own [Data Protection Policy](#).

WITH YOUR EDUCATOR

We share data that we have about you (except your email address) with educators or teaching assistants for educational content you access or request information about, so they can improve their content for you and other students. This data may include things like your city, country, browser language, operating system, device settings, the site that brought you to Comercial Escolà S.L., and your activities on Comercial Escolà S.L. If we collect additional data about you (like age or gender), we may share that too. We will not share your email address with educators or teaching assistants.

WITH OTHER STUDENTS AND EDUCATORS

Depending on your settings, your shared content and profile data may be publicly viewable, including to other students and/or contestants and educators. If you ask a question to an educator or teaching assistant, your information (including your name) may also be publicly viewable. Note that within Comercial Escolà S.L., all chat rooms, message boards, news groups, or other public forums available to participants are publicly visible to other participants, so you shouldn't post any confidential or proprietary information through those features.



WITH SERVICE PROVIDERS, CONTRACTORS, AND AGENTS

We share your data with third-party companies who perform services on our behalf, like payment processing, fraud and abuse prevention, data analysis, marketing and advertising services (including retargeted advertising), email and hosting services, and customer services and support. These service providers may access your personal data and are required to use it solely as we direct, to provide our requested service.

WITH COMERCIAL ESCOLÀ S.L. AFFILIATES

We may share your data within our corporate family of companies that are related by common ownership or control to enable or support us in providing the Services.

WITH BUSINESS PARTNERS

We have agreements with other websites and platforms to distribute our Services and drive traffic to Comercial Escolà S.L. Depending on your location, we may share your data with these partners.

WITH CREDIT-GRANTING ORGANIZATIONS FOR CONTINUING EDUCATION

If you take a course to fulfil a continuing professional education requirement, we may share that information upon request of the organisation granting the continuing education credit.



WITH ANALYTICS AND DATA ENRICHMENT SERVICES

As part of our use of third-party analytics tools like Google Analytics and data enrichment services available on the market, we share certain contact information, Account Data, System Data, Usage Data (**as detailed in Section *What Data We Get***), or de-identified data as needed. De-identified data means data where we have removed things like your name and email address and replaced it with a token ID. This allows these providers to provide analytics services or match your data with publicly available database information (including contact and social information from other sources). We do this to communicate with you in a more effective and customised manner.

TO POWER SOCIAL MEDIA FEATURES

The social media features in Comercial Escolà S.L. (like the Facebook Like button) may allow the third-party social media provider to collect things like your IP address and which page of Comercial Escolà S.L. you're visiting, and to set a cookie to enable the feature. Your interactions with these features are governed by the third-party company's Privacy and Data Protection Policy.

TO ADMINISTER PROMOTIONS AND SURVEYS

We may share your data as necessary to administer, market, or sponsor promotions and surveys you choose to participate in, as required by applicable law (like to provide a winners list or make required filings), or in accordance with the rules of the promotion or survey.



FOR ADVERTISING

If we decide to use an advertising-supported revenue model in the future, we may use and share certain System Data and Usage Data with third-party advertisers and networks to show general demographic and preference information among our users. We may also allow advertisers to collect System Data through Data Collection Tools (as detailed in Section *Cookies and Data Collection Tools*), to use this data to offer you targeted ad delivery to personalise your user experience (through behavioural advertising), and to undertake web analytics. Advertisers may also share with us the data they collect about you. To learn more or opt out from participating ad networks' behavioural advertising, see Section *Your Choices About the Use of Your Data* below. Note that if you opt out, you'll continue to be served generic ads.

FOR SECURITY AND LEGAL COMPLIANCE

We may disclose your data to third parties if we (in our sole discretion) have a good faith belief that the disclosure is:

- Permitted or required by law;
- Requested as part of a judicial, governmental, or legal inquiry, order, or proceeding;
- Reasonably necessary as part of a valid subpoena, warrant, or other legally-valid request;
- Reasonably necessary to enforce our Official Rules, Privacy and Data Protection Policy, and other legal agreements;
- Required to detect, prevent, or address fraud, abuse, misuse, potential violations of law (or rule or regulation), or security or technical issues; or
- Reasonably necessary in our discretion to protect against imminent harm to the rights, property, or safety of Comercial Escolà S.L., our users, employees, members of the public, or our Services.



We may also disclose data about you to our auditors and legal advisors in order to assess our disclosure obligations and rights under this Privacy and Data Protection Policy.

DURING A CHANGE IN CONTROL:

If Comercial Escolà S.L. undergoes a business transaction like a merger, acquisition, corporate divestiture, or dissolution (including bankruptcy), or a sale of all or some of its assets, we may share, disclose, or transfer all of your data to the successor organisation during such transition or in contemplation of a transition (including during due diligence).

AFTER AGGREGATION/DE-IDENTIFICATION

We may disclose or use aggregated or de-identified data for any purpose.

WITH YOUR PERMISSION

With your consent, we may share data to third parties outside the scope of this Privacy and Data Protection Policy.

SECURITY

We use appropriate security based on the type and sensitivity of data being stored. As with any internet-enabled system, there is always a risk of unauthorised access, so it's important to protect your password and to contact us if you suspect any unauthorised access to your account.

Comercial Escolà S.L. takes appropriate security measures to protect against unauthorised access, alteration, disclosure, or destruction of your personal data that we collect and store. These measures vary based on the type and sensitivity of the data. Unfortunately, however, no system can be 100%



secured, so we cannot guarantee that communications between you and Comercial Escolà S.L., or any information provided to us in connection with the data we collect through the Comercial Escolà S.L. will be free from unauthorised access by third parties. Your password is an important part of our security system, and it is your responsibility to protect it. You should not share your password with any third party, and if you believe your password or account has been compromised, you should change it immediately and contact our Support Team with any concerns.

YOUR RIGHTS

You have certain rights around the use of your data, including the ability to opt out of promotional emails, cookies, and collection of your data by certain third parties.

You can update or terminate your account from within Comercial Escolà S.L., and can also contact us for individual rights requests about your personal data. Parents who believe we have unintentionally collected personal data about their underage child should contact us for help deleting that information.

YOUR CHOICES ABOUT THE USE OF YOUR DATA

You can choose not to provide certain data to us, but you may not be able to use certain features of the Services.

To stop receiving promotional communications from us, you can opt out by using the unsubscribe mechanism in the promotional communication you receive or by changing the email preferences in your account. Note that regardless of your email preference settings, we will send you transactional and relationship messages regarding the Comercial Escolà S.L., including administrative confirmations, order confirmations, important updates about Comercial Escolà S.L., and notices about our policies.



If you're located in the European Economic Area, you may opt out of certain Data Collection Tools by clicking the "Cookie settings" link at the bottom of any page.

The browser or device you use may allow you to control cookies and other types of local data storage. To learn more about managing cookies, visit <https://www.aepd.es/es/documento/guia-cookies.pdf>. Your wireless device may also allow you to control whether location or other data is collected and shared.

To get information and control cookies used for tailored advertising from participating companies, visit <https://www.aepd.es/es/documento/guia-cookies.pdf>.

Apple iOS, Android OS, and Microsoft Windows each provide their own instructions on how to control in-app tailored advertising. For other devices and operating systems, you should review your privacy settings on that platform.

If you have any questions about your data, our use of it, or your rights, contact us at protecciondedatos@spiritessence.es.

ACCESSING, UPDATING, AND DELETING YOUR PERSONAL DATA

You can access and update your personal data that Comercial Escolà S.L. collects and maintains as follows:

To update data you provide directly, log into your account and update your account at any time.

To terminate your account:

- If you are a student and/or contestant, visit your profile settings page and follow the steps detailed here.



- If you are an educator, follow the steps detailed here.
- If you have any issues terminating your account, please send your inquiry to protecciondedatos@spiritessence.es.

Please note: even after your account is terminated, some or all of your data may still be visible to others, including without limitation any data that has been (a) copied, stored, or disseminated by other users (including comments on content); (b) shared or disseminated by you or others (including in your shared content); or (c) posted to a third-party platform. Even after your account is terminated, we retain your data for as long as we have a legitimate purpose to do so (and in accordance with applicable law), including to assist with legal obligations, resolve disputes, and enforce our agreements. We may retain and disclose such data pursuant to this Privacy and Data Protection Policy after your account has been terminated.

To request to access, correct, or delete your personal data, please use our online form [here](#). You can also submit these requests by emailing protecciondedatos@spiritessence.es or writing to us at Comercial Escolà S.L., Attn: Main Contact, Luis Paret 1, 28045 Madrid - SPAIN. Please allow up to 30 days for a response. For your protection, we may require that the request be sent through the email address associated with your account, and we may need to verify your identity before implementing your request. Please note that we retain certain data where we have a lawful basis to do so, including for mandatory record-keeping and to complete transactions.

OUR POLICY CONCERNING CHILDREN

We recognize the privacy interests of children and encourage parents and guardians to take an active role in their children's online activities and interests. Individuals younger than 18 years of age may not set up an account. If we learn that we've collected personal data from a child under those ages, we will take reasonable steps to delete it.



Parents who believe that Comercial Escolà S.L. may have collected personal data from a child under this age can submit a request that it be removed to protecciondedatos@spiritessence.es.

DEFINITIONS

PERSONAL INFORMATION

Personal information is defined under **The Organic Law 3/2018 of December 5 on Protection of Personal Data and Guarantee of Digital Rights (LOPD-GDD)** as data and files, of a personal nature, regardless of the support in which they are treated, and the treatment of the rights of citizens over them and the obligations of those who create or treat them. This includes all data that referred to registered humans on any support, computer or otherwise.

Examples of personal information include names, addresses, phone numbers and email addresses

The definition of personal information only relates to “natural” persons. It does not extend to other “legal” persons, such as companies

SENSITIVE INFORMATION

Under the Organic Law 3/2018 of December 5 on Protection of Personal Data and Guarantee of Digital Rights (LOPD-GDD), sensitive information is defined as:

- a) Information or an opinion about an individual’s:
- Racial or ethnic origin
 - Political opinions
 - Membership of a political association



- Religious beliefs or affiliations
- Philosophical beliefs
- Membership of a professional or trade association
- Membership of a trade union
- Sexual orientation or practices, or
- Criminal records

That is also personal information; or

- Health information about an individual
- Genetic information about an individual that is not otherwise health information

RELATED / RELEVANT LEGISLATIVE / POLICY FRAMEWORKS

- Organic Law 3/2018 of December 5 on Protection of Personal Data and Guarantee of Digital Rights (LOPD-GDD)
- REGLAMENTO (UE) 2016/679 DEL PARLAMENTO EUROPEO Y DEL CONSEJO de 27 de abril de 2016 relativo a la protección de las personas físicas en lo que respecta al tratamiento de datos personales y a la libre circulación de estos datos y por el que se deroga la Directiva 95/46/CE (Reglamento general de protección de datos)
- Corrección de errores del Reglamento (UE) 2016/679 del Parlamento Europeo y del Consejo, de 27 de abril de 2016, relativo a la protección de las personas físicas en lo que respecta al tratamiento de datos personales y a la libre circulación de estos datos y por el que se deroga la Directiva 95/46/CE (Reglamento general de protección de datos) [4 marzo 2021]



- Corrección de errores del Reglamento (UE) 2016/679 del Parlamento Europeo y del Consejo, de 27 de abril de 2016, relativo a la protección de las personas físicas en lo que respecta al tratamiento de datos personales y a la libre circulación de estos datos y por el que se deroga la Directiva 95/46/CE (Reglamento general de protección de datos) [23 mayo 2018]
- Ley Orgánica 3/2018, de 5 de diciembre, de Protección de Datos Personales y garantía de los derechos digitales
- Real Decreto 389/2021, de 1 de junio, por el que se aprueba el Estatuto de la Agencia Española de Protección de Datos
- Ley 34/2002, de 11 de julio, de servicios de la sociedad de la información y de comercio electrónico
- Ley 9/2014, de 9 de mayo, General de Telecomunicaciones

RELATED DOCUMENTS

- Official Rules
- Complaints and Appeals Policy

JURISDICTION-SPECIFIC RULES

You have certain rights related to accessing, correcting, opposing, erasing (right to oblivion), processing limitation, portability...

THESE RIGHTS ARE DEFINED BY:

- You can exercise them freely



- Should requests be ill-founded or unreasonable (for example, repetitive), the personal information holder can:
- Charge a fee proportional to born administrative costs
- Deny action
- Should the request be formulated by electronic means, the information will be returned the same way whenever possible, unless the claimant requests it otherwise.
- Should the personal information holder not initiate the request, he should communicate not later than 30 days, the reasons for his inaction and the possibility to claim to a Control Authority.
- The claimant can exercise his/her right directly or through his/her legal agent
- It may possible that the person in charge manages the request on behalf of the personal information holder, whenever both have reached a legal agreement

Please visit <https://www.aepd.es/es/derechos-y-deberes/conoce-tus-derechos> for further details.

To exercise any of these rights under AEPD, please email protecciondedatos@spiritessence.es or write to us at Comercial Escolà S.L., Attn: Main Contact, Luis Paret 1 28045 Madrid - SPAIN.

Additionally, for more information about the personal information we collect and how we collect it, please see the sections above entitled *What Data We Get* and *How We Get Data About You*.

To learn about the business and commercial purposes for which your personal information is collected and the categories of service providers who have access to your personal information, please see the sections above entitled *What We Use Your Data For* and *Who We Share Your Data With*.



USERS IN THE EUROPEAN ECONOMIC AREA (“EEA”) AND UNITED KINGDOM (“UK”)

If you are located in the EEA or UK, you have the right to request access to your data in a portable format and to request the rectification, erasure, restriction of processing, or objection to processing of your personal data. You may use the information in Section *Accessing, Updating and Deleting your Personal Data* to submit your request. Additionally, if you are located in the EEA, UK, or Switzerland, you also have the right to lodge a complaint with your supervisory authority.

UPDATES & CONTACT INFORMATION

When we make a material change to this policy, we will notify users via email, in-product notice, or another mechanism required by law. Changes become effective the day they are posted. Please contact us via email or postal mail with any questions, concerns, or disputes.

MODIFICATIONS TO THIS PRIVACY AND DATA PROTECTION POLICY

From time to time, we may update this Privacy and Data Protection Policy. If we make any material change to it, we will notify you via email, through a notification posted on the Services, or as required by applicable law. We will also include a summary of the key changes. Unless stated otherwise, modifications will become effective on the day they are posted.

As permitted by applicable law, if you continue to use the Services after the effective date of any change, then your access and/or use will be deemed an



acceptance of (and agreement to follow and be bound by) the revised Privacy and Data Protection Policy. The revised Privacy and Data Protection Policy supersedes all previous Privacy and Data Protection Policies.

INTERPRETATION

Any capitalised terms not defined in this policy are defined as specified in Comercial Escolà S.L.'s Official Rules. Any version of this Privacy and Data Protection Policy in a language other than Spanish & English is provided for convenience. If there is any conflict with a non-English/non-Spanish version, you agree that the English and Spanish language versions will control.

QUESTIONS

If you have any questions, concerns, or disputes regarding our Privacy and Data Protection Policy, please feel free to contact our privacy team (including our Data Protection Officer) at protecciondedatos@spiritessence.es. You can also send postal mail to us at Comercial Escolà S.L., Attn: Main Contact, Luis Paret 1, 28045 Madrid - SPAIN.