

Privacy politics

Data Processor

Company Name: SMILE2IMPRESS, LTD

Company Number: 12957895

Address: One Fleet Place, London, England, EC4M 7WS

E-mail: gdpr@smile2impress.com

DATA PROTECTION OFFICER:

Xavier Saula Adell. Calle Mallorca 237 bis Ppal 1.A. Barcelona.
Web: www.aurisadvocats.com. email: xavi@aurisadvocats.com.

SMILE2IMPRESS, as the Data Processor for the Website, in accordance with the provisions of Regulation (EU) 2016/679 of April 27, 2016 (GDPR) on the protection of natural persons with regard to the processing of personal data and the free movement of this data and other current regulations on the protection of personal data, and by Law 34/2002, of July 11, Services of the Information Society and Electronic Commerce (LSSICE), informs you that we have implemented the measures of necessary security, of technical and organizational nature, to guarantee and protect the confidentiality, integrity and availability of all entered data.

Purpose of personal data processing

Your personal data will only be used for the following purposes:

- To carry out the necessary commercial and administrative procedures with Web Users;
- To respond to commercial enquiries by email, fax, SMS, MMS, social media or any other existing form of communication whenever express consent has been granted by subscribing to our NEWSLETTER.
- To respond to queries and/or provide information requested by the User;
- To carry out the provision of services and/or products contracted or subscribed to by the User
- To use your data to contact you, both electronically and non-electronically, to obtain your opinion about the service provided and,

- To notify you about changes, important developments of the privacy policy, legal notices or cookies policy.
- Analysis of profiles and usability will be carried out through Cookies.
- In the event of video surveillance the data will be processed solely to guarantee the security to clients and employees.
- Client and/or suppliers data will be processed, within the contractual relationship that links them with the person in charge, in compliance with the administrative, fiscal, accounting, and working obligations that are necessary under the current legislation.

You can revoke your consent at any time by sending a letter with the subject "UNSUBSCRIBE" to gdpr@smile2impress.com

In accordance with LSSICE, SMILE2IMPRESS does not partake in SPAM practices, therefore, it does not send commercial emails that have not been previously requested or authorized by the User. Consequently, in all the communications that you will receive from the provider, the User has the possibility of canceling his or her express consent to receive our communications.

We will not use your personal data for any other purpose than those described except by legal obligation or judicial requirements.

Data conservation periods

Data will be kept during all the duration of the commercial relationship unless stated otherwise by the exercise of the right to access, rectification, erasure, restriction, portability or to withdraw consent. Nevertheless, we will keep specific personal data during the maximum 2 year term by legal imposition to respond to the Authority when required for legal prosecution purposes regarding unlawful web usage.

Hereby we inform you that our conservation policies meet the legal terms regarding conservation:

a) General rule

In virtue of what is stated in art. 30 of the Commerce Code, all business data will be kept during 6 years.

This affects all accounting, tax, labor or commercial documentation, including correspondence.

b) Specific terms

Our company must also set minimum deadlines depending on the type of data in question and taking into account the different prescription periods, which each department must know.

This table lists the prescription periods that affect or may affect our organization:

Subject	Period	Rule
Labor infringements	3 years	Art. 4.1 RD 5/2000
Social security regarding infringements	4 years	Art. 4.2 RD 5/2000
Prevention of occupational hazards for the purposes of infractions	5 years	Art. 4.3 RD 5/2000
Fiscal for the purpose of tax debts	4 years	Art. 66 Ley 58/2003
Tax for the purposes of checks on compensated fees or applied deductions	10 years	Art. 66 bis Ley 58/2003
Accounting and commercial	6 years	Art. 30 del CC
Crimes against Public Finance and Social Security	10 years	Art. 131 LO 10/1995

Lawfulness of personal data processing

- a) Contractual performance
- b) Consent of the data subject
- c) Compliance with legal duties
- d) Legitimate interest: sending of our own advertising

COMMUNICATIONS

Any communication sent will be incorporated into the Information Systems of SMILE2IMPRESS. By accepting these conditions, terms, and policies, the User expressly consents to SMILE2IMPRESS carrying out the following activities and/or actions, unless the User indicates otherwise:

- The sending of commercial and/or promotional communications by any means enabled informing the Users of the activities, services, promotions, advertising, news, offers, and other information about the services and products related to the activity.
- In the event that the User has expressly consented to the sending of commercial communications electronically by subscribing the NEWSLETTER, the sending of such communications by electronic means informing the Users of the activities, services, promotions, advertising, news, offers, and other information about the services and products of SMILE2IMPRESS equal or similar to those that were originally the aim of the contract or interest by the User.
- The storage of personal data during the periods provided in the applicable provisions.

Official means of communication

The User is informed that the means enabled by the company to communicate with customers and others affected are the corporate phone, corporate mobile phones, and corporate email.

If you send personal information through a means of communication other than those indicated in this section, the PROVIDER will be exempt from liability in relation to the security measures available regarding the medium in question.

Assignments or transfers recipients

SMILE2IMPRESS will carry out data transferring or communication to third parties that will process data within the EU. Nevertheless, there will not be any international transferring

of data outside these boundaries. The User expresses hereby the consent of such transferring of data limited to the purpose stated in this document.

SMILE2IMPRESS will hand out data information to the authorities and to the police if there is a need to comply with a legal procedure, legal obligation, without prejudice of blocking or cancelling an account if there are signs of criminal offence. The information handed to the authorities in such an event will only regard the current information stored by the service provider.

The information that you provide us both through this website and through the application will be hosted on the servers of SMILE2IMPRESS.

Rights of concerned individuals

As a concerned User, you can request to exercise the following rights before SMILE2IMPRESS by submitting a letter to the postal address located in the letterhead or by sending an email to gdp@smile2impress.com indicating as Subject: "GDPR, Rights affected", and attaching a photocopy of your National Identity Document (DNI) or any analogous document, as indicated by law.

Rights:

- Access rights: allows the interested party to acknowledge and obtain information about their personal data submitted to processing.
- Right to rectification or deletion: it allows to correct errors and modify the data that proves to be inaccurate or incomplete.
- Right to erasure: allows data that turns out to be inadequate or excessive to be deleted.
- Right to withdraw consent: the right of the interested party to not carry out the processing of their personal data or to cease it.
- Restriction of personal data processing: involves the marking of personal kept data, with the purpose of limiting its' future processing.
- Portability of the data: facilitation of the data subject to processing to the interested party, so that he or she can transmit it to another person in charge, without impediments.
- The right not to be subject to automated individual decisions (including the elaboration of profiles): the right not to be the subject of a decision based on automated processing that produces effects or significantly affects the User.

As a User, you have the right to withdraw consent given at any time. The withdrawal of consent will not affect the lawfulness of the process carried out before the with-

drawal of consent.

You also have the right to submit a claim to the supervisory authority if you believe that your rights may have been violated in relation to the protection of your personal data (agpd.es).

Additional information

INFORMATION WE COLLECT

The data collected by the Data Controller are the following:

- Data provided by users through the different services offered on the website
- Data included in the different forms provided on the website
- Data collected through “cookies” to improve the browsing experience as reported in the cookie policy.
- Data provided by clients receiving the services, by any means.

Through this Privacy Policy we inform you that the photographs that are posted on the website are property of SMILE2IMPRESS, including those of minors, of which, in order to obtain these, prior consent of the parent, tutors, or legal representatives has been obtained by signing the forms made for that purpose by the centers in which matters regarding minors are regulated.

In some establishments, images may be captured for the sole purposes indicated in this Privacy Policy and / or at the request of authorities.

We have an informative document at the request of anyone who may request it and signs indicating the video surveillance area located in a place prior to the camera and sufficiently visible to see.

The footage captured by the video surveillance cameras will only concern the public establishment. Images of street will not be captured except for a minimum strip of the entrances to the establishment.

The recording system will be located in a guarded or restricted access location. The footage obtained will be accessed only by the authorized personnel and will be kept for a maximum period of thirty days from their capture.

Social media

We inform you that SMILE2IMPRESS may have a presence on social networks. The processing of data that is carried out concerning the people who become followers on social networks (and/or carry out any link or connection action through social networks) of the official pages of SMILE2IMPRESS will be governed by this section, as well as those conditions

of use, privacy policies, and access regulations that belong to the social network that is appropriate in each case and previously accepted by the User.

SMILE2IMPRESS will process your data with the purpose of correctly managing your presence on social networks, informing you of the provider’s activities, products, or services, as well as for any other purpose that the regulations of the social networks allow.

The publication of the following content is prohibited:

- That is unlawful by national, community, or international regulations or that they carry out activities that are presumably unlawful or contravene the principles of good faith.
- That threaten the fundamental rights of people, lack courtesy in the network, annoy or may generate negative opinions to our Users or third parties and in general whatever the content that SMILE2IMPRESS deems inappropriate.
- In general that contravene the principles of legality, honesty, responsibility, protection of human dignity, protection of minors, protection of public order, protection of privacy, consumer protection, and intellectual and industrial property rights.

Likewise, SMILE2IMPRESS reserves the right to remove, without notice from the website or the corporate social network, those contents deemed inappropriate.

Communications sent through social networks will be incorporated into a file owned by SMILE2IMPRESS, and may send you information of interest.

You can access more information, as well as consult the companies that are part of SMILE2IMPRESS, through the following link: www.empresa.com/politicadeprivacidad.

In any case, if you send personal information through the social network, SMILE2IMPRESS will be exempt from liability in relation to the security measures applicable to this platform, which is the Users’ responsibility to know, by checking the corresponding conditions particular to the network in question.

Security measures

The information you provide will be processed confidentially. The Provider has adopted all the technical and organizational measures and all the levels of protection necessary to guarantee the security in the processing of the data and to avoid its alteration, loss, theft, processing or unauthorized access, according to the state of technology and nature of the stored data. Likewise, it is also guaranteed that the processing and registration in files, programs, systems or equipment, premises and centers comply with the requirements and conditions of integrity and security established in the current regulations.

Language

The language applicable to this Privacy Policy is English. Therefore, in case there is any contradiction in any of the versions provided in other languages, the English version will have prevalence.

Sending of CV

In the event that the User submits his or her CV through any means established by SMILE2IMPRESS, we inform you that the information provided will be processed to make him or her participant in the selection processes that may exist, carrying out an analysis of the applicant's profile in order to select the best candidate for the vacancy of the Company (Provider). We inform you that this is the only official procedure to accept your CV, so CVs submitted by another procedure will not be accepted. In case of any change in the data provided, please inform us in writing as soon as possible, in order to keep your data properly updated.

The data will be kept for a maximum period of one year, after which the data will be deleted guaranteeing a total respect to confidentiality both in the processing and in its subsequent destruction. In this sense, after the aforementioned deadline, and if you wish to continue participating in the selection processes of the Company (Provider), please re-submit your CV.

The data may be processed and/or communicated to the member companies of our group during the time of conservation of their curriculum and for the same purposes previously reported.

Changes in the present privacy policy

SMILE2IMPRESS reserves the right to modify this policy to adapt it to new legislation or jurisprudence dispositions.

Legislation

For all purposes, the relationship between SMILE2IMPRESS and the Users of its telematic services, present on this Website, are subject to the Spanish legislation and jurisdiction to which the parties expressly submit, being competent for the resolution of all conflicts arising or related to their use the Courts and Tribunals of Barcelona.