

WEBSITE PRIVACY POLICY

1. INTRODUCTION

Vector Cuatro S.L.U. (hereinafter, the "**Company**") that may be contacted at the email address privacyexpert@falckgroup.eu provides this Privacy Policy regarding the processing of the data of the users of the website www.vectorcuatrogroup.com/en/home (hereinafter, the "**Users**" and the "**Site**").

2. DATA CONTROLLER

Vector Cuatro S.L.U., with registered office in C/ Serrano, núm. 27, 4ª Izda. 28001, Madrid, is the data controller. The Customers may request a complete list of the data processors appointed by the Company by asking it at the paragraph 9 of this privacy policy.

3. CATEGORIES OF DATA PROCESSED

The Company shall process, in accordance with this privacy policy:

- a) data about the User's surfing activity on the Site;
- b) data collected through the Site, such as identification data (i.e. name, surname) and contact details (i.e. email address) voluntarily disclosed by the User;
- c) data provided in case of request for information or assistance on the part of the User; and
- d) data about the User's surfing activity on the Site, collected through cookies and in accordance with the information on cookies provided here [...];
(hereinafter jointly defined as "**Personal Data**").

The Company shall not process any special categories of personal data pursuant to article 9 of the Regulation (EU) 2016/679 on personal data protection (hereinafter, the "**Privacy Regulation**").

Personal Data are processed only where necessary to pursue the purposes described in paragraph 4 of this privacy policy.

4. PURPOSES OF THE PROCESSING

The Company shall process the Personal Data for the following purposes:

- a) using the services offered by the Site;
- b) replying to Users' requests about the services of the Company and providing them with support;

- c) exercising or defending legal claims in court proceedings or in an administrative or out-of-court procedure;
(the purposes from point a) to point c) below shall be collectively referred to as "**Contractual Purposes**");
- d) for the purposes of compliance with the applicable domestic and EU provisions and/or to comply with the requests of public authorities ("**Legal Obligation Purposes**");
- e) completing a potential merger, transfer of goods, transfer of business or business unit, disclosing and transferring the Personal Data to the third party/ies involved ("**Business Legitimate Interest Purposes**");
- f) subject to the prior consent of the User, for sending direct marketing communications through email for the promotion and/or sale of the Company's products and/or services, as well as for market surveys or other studies useful for the improvement of its products and/or services ("**Marketing Purposes**");
- g) if Users have given their consent to the processing of their Personal Data for Marketing Purposes to the Company, send customized newsletters and communications about products and services offered by the Company through email, to Users identified only on the basis of general categories such as, for example, the sector where the User is employed ("**Profiling Legitimate Interest Purposes**").

5. LEGAL BASIS OF THE PROCESSING

The processing of Personal Data is necessary with reference to the Contractual Purposes given its being essential for the purposes of using the services of the Site. If Users do not intend to disclose their Personal Data for such Contractual Purposes, they may not be able to use the services and functionalities of the Site.

The processing of Personal Data is necessary with reference to the Legal Obligation Purposes in order to comply with the provisions of the applicable rules and regulations. If Users do not intend to disclose their data for such Contractual Purposes, the Company may not comply with such provisions.

The processing of Personal Data for the Business Legitimate Interest Purposes shall be carried out to pursue one of the Company's legitimate interests, which is equally balanced with the interests of the User. In this case, the processing of Personal Data is limited to what is strictly necessary for the performance of the activities specified above pursuant to Article 6(1)(f) of the Privacy Regulation. The processing for the Purposes of Business Legitimate Interest is not mandatory and the User may object to the said processing subject to the modalities under this privacy policy; however, should the User object to the said processing, their data may not be used for the Purposes of Legitimate Interest.

The processing for Marketing Purposes is optional. Should the Users deny their consent, they may not receive direct newsletters and marketing communications. The Users may at any time withdraw their consent according to the modalities specified in this privacy policy.

The processing for Profiling Legitimate Interest Purposes is functional to pursue the Company's legitimate interest, appropriately balanced against the Users' interests in light of the limitations to this processing in the paragraph 4 g) above.

6. DISCLOSURE OF PERSONAL DATA

For the Contractual and the Legal Obligation Purposes, the personal data of the Users may be transferred to the following categories of intended recipients, situated in the European Union: (a) third party providers of assistance and advisory services for the Company with reference to the activities of the following sectors, for example: technological, administrative, legal, insurance, and IT; (b) companies of the Falck group; (c) persons and authorities whose right to access the personal data of the Users is expressly granted by operation of law, by regulations or measures issued by the appropriate authorities. Such intended recipients shall, as the case may be, process the personal data in their capacity as controllers, processors, or persons in charge of the processing.

For the Purposes of Business Legitimate Interest specified above, the personal data of the Users may be transferred to the following categories of intended recipients, situated in the European Union: (a) third party providers that provide assistance and advice to the Company; (b) companies of the Falck group; (c) potential purchasers of the Company and entities resulting from the merger or any other form of transformation regarding the Company; and (d) appropriate authorities.

For the Marketing Purposes and Profiling Legitimate Interest Purposes specified above, the Personal Data of the Users may be transferred to the following categories of intended recipients, situated in the European Union: (a) third party providers that provide assistance and advice for the Company with reference to the activities that involve sending commercial communications; and (b) companies of the Falck group.

A complete list of the persons in charge of the processing is available upon request through the modalities specified in this information.

7. PERSONAL DATA TRANSFER

The personal data may be freely transferred outside the domestic territory to countries situated in the European Union. Any transfer of the personal data of the User to Countries situated outside the European Union, and, in particular, in all countries where Vector Cuatro Group has subsidiaries, shall take place, in any case, in compliance with the appropriate and adequate guarantees for the purposes of the transfer pursuant to the applicable rules and regulations and in particular pursuant to Articles 45 and 46 of the Privacy Regulation.

Users will have the right to obtain a copy of the safeguards measures or information about where they have been made available by asking directly to the Controller, through the contact details provided in paragraph 9 of this document.

8. DATA PROTECTION RIGHTS

The User may exercise the following rights at any time, free of charge, by sending an email at privacyexpert@falckgroup.eu.

- a) obtain from the Company confirmation as to whether or not the Personal Data about them exist, and receive information about the contents and source of the data, verify the accuracy thereof and request that the data be integrated, updated, or rectified;
- b) obtain the erasure, anonymization or the block of the data that have been processed in breach of the applicable law, if any;
- c) object, in whole or in part, to data processing on legitimate grounds; and
- d) withdraw at any time consent to data processing (in relation to the processing operations for which such consent is possibly necessary), without prejudice to the lawfulness of the processing based on the consent given prior to withdrawal.
- e) demand the Company to restrict the processing of their Personal Data in the case that: (i) the User contests the accuracy of their Personal Data for a period enabling the Company to verify the accuracy of such Personal Data; (ii) data processing is unlawful and the User rejects the erasure of their Personal Data and requests the restriction of their use instead; (iii) although the Company no longer needs the personal data for the purposes of data processing, the Personal Data are necessary for the User for the establishment, exercise or defense of legal claims; (iv) the User has objected to the processing pursuant to Article 21(1) of the Privacy Regulation, pending the verification as to whether or not the Company's binding legitimate grounds to continue the processing override those of the data subject;
- f) object to the processing of their Personal Data;
- g) request the erasure of the Personal Data concerning them without undue delay;
- h) obtain the portability of the Personal Data; and
- i) lodge a complaint with the appropriate supervisory authority where the requirements for this are met.

9. CONTACTS OF THE DATA CONTROLLER

Should the User have any doubts or requests regarding this policy, or should the User intend to exercise the data protection rights under paragraph 8 above, then the User should contact the Company at privacyexpert@falckgroup.eu

10. STORAGE PERIODS

The personal data of the User shall be stored as long as it is necessary to pursue the specific purposes for which they have been collected, as stated in this privacy policy, and, in any case:

- a) for the Contractual Purposes, the Personal Data shall be stored for the period of use of the services covered by the Site and for the 10 years following the termination thereof, save for the cases in which the storage for a subsequent period is required in view of litigation, requests of the appropriate authorities or pursuant to the applicable rules and regulations;
- b) for the Business Legitimate Interest Purposes, the Personal Data shall be stored for the period of 10 years from the collection;

- c) for Marketing Purposes and Profiling Legitimate Interest Purposes, the Personal Data shall be stored for 24 months from the collection.

Once the above-mentioned terms have expired, the data of the User may be erased, anonymized, and/or aggregated.

11. MINORS

The Site is not addressed to minors. If the User is a minor, they must not continue surfing on the Site.

12. AMENDMENTS AND UPDATES

This policy shall be valid from the effective date. The Company, however, may amend and/or supplement this policy, also as a consequence of the amendments to and/or supplements of the applicable rules and regulations. In any case, the Users shall be informed in advance of any amendments and/or updates, and in any case the text of the updated policy shall be available at any time at www.vectorcuatrogroup.com

CONSENT TO DATA PROCESSING

I declare that I have read and understood this privacy policy related to the processing of my personal data and that I give my consent to the use of my personal data by the Company, acting as data controller, for sending marketing communications through email related to its products and services.

I give my consent

I don't give my consent