

Privacy Policy

Basic information on Data Protection	
Responsable	LASUS MARSA, S.A.
Puerpose	Provision of online services Web user management Commercial communications related to our services
Legitimation	Express consent and legitimate interest
Recipients	No data is transferred to third parties, except legal obligation.
Rights	Access, rectify and delete the data, as well as other rights, as explained in the Additional Information
Information additional	You can consult the additional and detailed information on Data Protection in the attached clauses found at https://www.maxzander.com/legal/LASUS-MARSA-politica-de-privacidad-web-en.pdf

At Max Zander we work to offer you the best possible experience through our products and services. In some cases, it is necessary to gather information to achieve this. We care about your privacy and we believe that we must be transparent about it.

For this reason, and for the purposes of the REGULATION (EU) 2016/679 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL of April 27, 2016 (hereinafter, "RGPD") regarding the protection of natural persons with regard to the processing of personal data and the free circulation of these data, and LAW 34/2002, of July 11, on Information Society Services and electronic commerce (hereinafter, "LSSI"), LASUS MARSA, SA informs to the user who, as the data controller, will incorporate the personal data provided by the users in an automated file.

Our commitment begins by explaining the following to you:

Your data is collected so that the user experience improves, according to your interests and needs.

We are transparent about the data we collect about you and why we do it.

Our intention is to offer you the best possible experience. Therefore, when we are going to use your personal information, we will always do so in compliance with the regulations, and when necessary, we will request your consent.

We understand that your data belongs to you. Therefore, if you decide not to authorize us to process them, you can ask us to stop processing them.

Our priority is to guarantee your security and treat your data in accordance with European regulations.

If you wish to obtain more information about the processing of your data, consult the different sections of the privacy policy found below:

Who is responsible for the processing of your personal data?

Identity: LASUS MARSA, SA

Registered office: PLA DE MATABOUS, 36-38

CIF no.: A08366098

Email: <u>lasus@lasus-marsa-sa.es</u>

Max Zander has appointed a Data Protection Officer or internal contact person within your organization. If you wish to make a query regarding the processing of your personal data, you can contact him by email lasus@lasus-marsa-sa.es

What personal data do we collect?

The personal data that the user can provide:

- Name, address and date of birth. Telephone number and email address. Location.
- Information regarding payments and returns.
- IP address, date and time you have accessed our services, internet browser you use and data about the device's operating system.
- Any other information or data that you decide to share with us.

In some cases, the completion of the registration form is mandatory to access and enjoy certain services offered on the web; likewise, not providing the requested personal data or not accepting this data protection policy means that it is impossible to subscribe, register or participate in any of the promotions in which personal data is requested.

Why and for what do we process your data?

At Max Zander we treat the information provided by interested persons for the following purposes:

- Manage orders or contract any of our services, either online or in physical stores.
- Manage the sending of the information that they request.

- Develop commercial actions and carry out the maintenance and management of the relationship with the user, as well as the management of the services offered through the website and the information tasks, being able to carry out automatic evaluations, obtaining profiles and customer segmentation tasks in order to personalize the treatment according to their characteristics and needs and improve the customer's online experience.
- Develop and manage contests, raffles or other promotional activities that may be organized. In some cases it will be necessary to provide information to the Authorities or third companies for auditing purposes, as well as to handle personal data from invoices, contracts and documents to respond to claims from clients or Public Administrations.

We inform that the personal data obtained as a result of your registration as a user will form part of the Register of Treatment Activities and Operations (RAT), which will be updated periodically in accordance with the provisions of the RGPD.

What is the legitimacy for the processing of your data?

The treatment of your data may be based on the following legal bases:

Consent of the interested party for the contracting of services and products, for the contact forms, the requests for information or registration in e-newsletters.

Legitimate interest for the treatment of our clients' data in direct marketing actions and express consent of the interested party for everything related to automatic evaluations and profiling.

Compliance with legal obligations for fraud prevention, communication with public authorities and third-party claims.

How long do we keep your data?

The processing of the data for the purposes described will be maintained for the time necessary to fulfill the purpose of its collection (for example, while the commercial relationship lasts), as well as for the fulfillment of the legal obligations that derive from the treatment of the data.

To which recipients is your data communicated?

In some cases, only when necessary, Max Zander will provide user data to third parties. However, the data will never be sold to third parties. The third-party service providers (for example, payment providers or delivery companies) with whom Max Zander works may use the data to provide the corresponding services, however, they will not use such information for their own purposes or for transfer to third parties.

Max Zander endeavors to ensure the security of personal data when it is sent outside the company and ensures that third party service providers respect confidentiality and have adequate measures in place to protect personal data. Said third parties have the obligation to guarantee that the information is treated in accordance with the data privacy regulations.

In some cases, the law may require that personal data be disclosed to public bodies or other parties, only what is strictly necessary to comply with said legal obligations will be disclosed.

The personal data obtained may also be shared with other group companies.

Where is your data stored?

In general, the data is stored within the EU. The data that is sent to third parties that do not belong to the EU, we will make sure that they offer a sufficient level of protection, either because they have Binding Corporate Rules (BCR) or because they have adhered to the "Privacy Shield".

What rights do you have and how can you exercise them?

You can direct your communications and exercise your rights by requesting the following email: lasus@lasus-marsa-sa.es.

By virtue of what the RGPD establishes, you can request:

- Right of access: you can request information on the personal data that we have about you.
- Right of rectification: you can communicate any change in your personal data.
- Right to erasure and to be forgotten: you can request the elimination prior to blocking of personal data.
- Right of limitation to treatment: implies the restriction of the processing of personal data.
- Right of opposition: you can withdraw your consent to the processing of the data, opposing their further processing.
- Right to portability: in some cases, you can request a copy of personal data in a structured, commonly used and machine-readable format for transmission to another person in charge.
- Right not to be the subject of individualized decisions: you can request that decisions are not made that are based solely on automated processing, including profiling, that produces legal effects or significantly affects the interested party.
- In some cases, the request may be rejected if you request the deletion of data necessary for compliance with legal obligations.
- Likewise, if you have a complaint about the processing of data, you can file a claim with the data protection authority.

Who is responsible for the accuracy and veracity of the data provided?

The user is solely responsible for the veracity and correctness of the data included, exonerating Max Zander from any responsibility in this regard. Users guarantee and respond, in any case, to the accuracy, validity and authenticity of the personal data provided, and undertake to keep them duly updated. The user agrees to provide complete and correct information in the registration or subscription form. Max Zander reserves the right to terminate the contracted services that have been held with users, in the event that the data provided is false, incomplete, inaccurate or out of date.

Max Zander is not responsible for the veracity of the information that is not of its own creation and for which another source is indicated, therefore it does not assume any responsibility for hypothetical damages that may arise from the use of said information.

Max Zander reserves the right to update, modify or eliminate the information contained in its web pages and may even limit or deny access to said information. Max Zander is exonerated from liability for any loss or damage that the user may suffer as a result of errors, defects or omissions, in the information provided by Max Zander, provided that it comes from sources other than the same.

Likewise, the user certifies that they are over 14 years of age and that they have the necessary legal capacity to provide consent regarding the processing of their personal data.

How do we treat the personal data of minors?

In principle, our services are not specifically aimed at minors. However, in the event that any of them are directed to minors under fourteen years of age, in accordance with article 8 of the RGPD and article 7 of LO3 / 2018, of December 5 (LOPDGDD), Max Zander will require consent valid, free, unequivocal, specific and informed of their legal guardians to process the personal data of minors. In this case, the DNI or another form of identification of the person giving consent will be required.

In the case of persons over fourteen years of age, the data may be processed with the consent of the user, with the exception of those cases in which the Law requires the assistance of the holders of parental authority or guardianship.

What security measures do we apply to protect your personal data?

Max Zander has adopted the legally required levels of security for the protection of Personal Data, and seeks to install those other means and additional technical measures at its disposal to avoid the loss, misuse, alteration, unauthorized access and theft of the Personal Data provided. to Max Zander.

Max Zander is not responsible for hypothetical damages that could be derived from interferences, omissions, interruptions, computer viruses, telephone breakdowns or disconnections in the operational functioning of this electronic system, caused by causes beyond Max Zander's control; of delays or blockages in the use of this electronic system caused by deficiencies or overloads of telephone lines or overloads in the Data Processing Center, in the Internet system or in other electronic systems, as well as damages that may be caused by third parties people through unlawful meddling outside of Max Zander's control. However, the user must be aware that Internet security measures are not impregnable.

Links to other websites

There may be links to other web pages on the https://www.maxzander.com/ website. By clicking on one of these links and accessing an external website, the visit will be subject to the privacy policy of said website, leaving Max Zander disengaged from any type of responsibility regarding its privacy policy.

How do we use cookies?

The Max Zander website uses cookies in order to optimize and personalize your navigation on it. Cookies are physical files of information that are housed in the user's own terminal, the information collected through cookies serves to facilitate the user's navigation through the portal and optimize the browsing experience. The data collected through cookies can be shared with their creators, but in no case will the information obtained by them be associated with personal data or data that may identify the user.

However, if the user does not want cookies to be installed on their hard drive, they have the possibility of configuring the browser in such a way as to prevent the installation of these files. For more information, see our Cookies Policy https://www.maxzander.com/legal/LASUS-MARSA-politica-de-cookies-en.pdf.

Can the privacy policy be modified?

This privacy policy can be modified. We recommend that you review the privacy policy periodically.