

PRIVACY POLICY

Below, we inform you about the processing of personal data carried out by Jotelulu. With this privacy policy, we aim to comply with Regulation (EU) 2016/679 of the European Parliament and of the Council, dated April 27, 2016, on the protection of natural persons regarding the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (hereinafter referred to as the "General Data Protection Regulation" or "GDPR"), as well as any applicable data protection legislation in the territories where we operate.

Currently, at JOTELULU, we process data in different ways and for various types of relationships: leads, clients or partners, website users, and users of our product platform. Some of these sections may apply to you due to their general nature, while others may only require your attention to specific parts. If this is the case, you only need to refer to the subsection that interests you.

1. Who is responsible for processing your data?

The entity responsible for processing your personal data is JOTELULU, S.L. (hereinafter, "JOTELULU"), with Tax ID No. B-65814709 and registered address at Calle Leganitos No. 47, 4th floor – 28013 Madrid, Spain.

This Privacy Policy governs access to and use of the website (hereinafter, the "Website") made available by JOTELULU to Internet users (hereinafter, the "Users") interested in the content (hereinafter, the "Content") and services (hereinafter, the "Services") offered by JOTELULU through the Website.

Contact email: finanzas@jotelulu.com

DPO email: dpd@jotelulu.com

2. Information about the data JOTELULU collects through the Website

For the proper functioning of the Website, JOTELULU may have access to the following data provided, if applicable, by the User:

- **Identification data:** User's first and last name.
- **Company data:** Company name, sector, and VAT identification number (CIF).
- **Contact data:** Email, phone number, and postal address.
- **Financial information:** Banking details.

3. For what purposes and on what legal grounds can JOTELULU process your personal data?

JOTELULU may process Users' personal data based on the following legal grounds and for the following purposes:

The legal basis for JOTELULU to process Users' data through this Website is the consent provided by the Users for the processing of their personal data. The purpose is to send information to the User about the requested products.

To analyze the User's behavior on our Website to understand their preferences regarding our products, content, and/or services through cookies and other tracking devices. For more information, you can refer to our Cookie Policy at <https://jotelulu.com/en-gb/cookies-policy/>

Management of commercial communications about our products and services, as well as content or other relevant information, through different channels based on the User's preferences. In this regard, the legal basis may be consent or legitimate interest if the communication is considered transactional.

With regard to this point, the User may withdraw their consent at any time by sending a message to the following email address: dpd@jotelulu.com. This withdrawal will not affect the lawfulness of processing based on consent given prior to its withdrawal.

4. Accuracy of the data provided by Users

The User guarantees the accuracy of the personal data provided and undertakes to notify JOTELULU of any changes to such data. The User will, in any case, be responsible for the accuracy of the data provided, and JOTELULU reserves the right to exclude from its services any User who has provided false data, without prejudice to any other actions permitted by law.

Users are encouraged to protect their data with the utmost diligence by using appropriate security tools. JOTELULU shall not be held liable for any theft, unlawful modification, or loss of data.

Any modification or update to the data must be communicated to JOTELULU through the communication channels outlined in this Privacy Policy.

5. Data Retention

JOTELULU retains personal data for varying periods depending on the type of information, the duration of our terms and conditions with Clients, legal requirements for specific types of data, and other factors. Generally, once your data is no longer needed for the purposes it was collected for, we will stop processing it.

If we must retain your data to fulfill a contractual or legal obligation or to resolve disputes, we will store it only for these purposes and to exercise our rights of defense. In this regard, access will be restricted to specific personnel or functions. Additionally, JOTELULU will keep such information blocked according to designated technical criteria.

JOTELULU commits to upholding its obligation of secrecy and confidentiality regarding personal data in compliance with applicable legislation.

6. User Rights

Users have the right to:

- Right to be informed: Receive clear, transparent, and easily understandable information about how we use your personal data and your rights.
- Right of access: Access your personal data.
- Right of rectification: Rectify your personal data if it is inaccurate or incomplete.
- Right of erasure: Request the deletion of your personal data when there is no compelling reason for us to continue using it.
- Right to restrict processing: "Block" or suppress further use of your personal data. We may still store your data, but we cannot continue processing it.
- Right to data portability: Obtain and reuse your personal data for your own purposes across different services.
- Right to object to processing: Object to certain types of processing, such as processing based on legitimate interest.
- Right to withdraw consent: Withdraw your consent for specific processing at any time without affecting the lawfulness of processing based on consent prior to withdrawal.
- Right not to be subject to automated decision-making: Not be subject to a decision based solely on automated processing (including profiling) that produces legal effects (or similarly significant effects).

Users can exercise these rights by emailing dpd@jotelulu.com, stating the reason for their request and providing a copy of their ID.

Requests can also be sent by mail to the following address: Calle Leganitos No. 47, 4th floor – 28013 Madrid, Spain.

The communication to JOTELULU must include the following information:

- User's full name and a photocopy of their national ID, passport, or another valid identification document.
- Specific request detailing the action to be taken.

Without prejudice to other administrative or legal remedies, Users have the right to lodge a complaint with a Supervisory Authority, particularly in the Member State where they habitually reside, work, or where the alleged infringement occurred, if they believe their personal data is not being processed in accordance with the law or if their rights are not being adequately upheld. The Supervisory Authority will inform the complainant about the progress and outcome of the complaint.

7. Data Security

Protecting Users' privacy and personal data is very important to JOTELULU. As such, JOTELULU has taken all measures within its reach to prevent data misuse, ensuring access is granted only to authorized personnel.

JOTELULU maintains appropriate security measures to protect personal data in accordance with applicable legislation and has implemented all available technical measures to prevent the loss, misuse, alteration, unauthorized access, and theft of data provided by Users through the Website. However, Users are informed that no security measures on the Internet are completely invulnerable.

JOTELULU is committed to maintaining confidentiality and secrecy concerning personal data, in accordance with applicable legislation.

JOTELULU is not responsible for damages resulting from a User's failure to comply with this obligation.

8. Transfers and/or Disclosures to Third Parties

Users are informed that their personal data will not be shared with third-party companies or entities.

Users' data may only be used by JOTELULU to fulfill the purposes of data processing outlined in Section 3 of this Privacy Policy.

9. Questions

If you have any questions about our Privacy Policy, please contact us by email at dpd@jotelulu.com.

Additionally, if you believe your rights are not being properly safeguarded, you have the right to file a complaint with the Spanish Data Protection Agency.

10. Acceptance and Consent

The User declares having been informed of the conditions regarding personal data protection, accepting and consenting to their data being processed by JOTELULU in the manner and for the purposes indicated in this Privacy Policy.