

PRIVACY POLICY

Identity of the entity responsible for the processing

The entity responsible for the data processing, i.e., which decides about the purpose for which the personal data are processed.

Clarke, Modet y Cía., S.L., a company constituted in accordance with Spanish law, with business address in Calle Suero de Quiñones 34, Spain, with Tax ID Code B-83049189, registered in the Commercial Register of Madrid, Volume 16695, Book 0, Page 96, Section 8, Sheet M-284972, Entry 1 (hereinafter ClarkeModet)

Data corresponding to the users of the platform

The data which are considered to be of a personal nature provided by the user, as a result of the formalization of the contractual relationship, are the responsibility of ClarkeModet. Said data will be processed by ClarkeModet for the management of the contractual relationship established, understanding that the legal basis of said processing is the compliance of the contractual relationship and the administrative management thereof

ClarkeModet will keep the data provided by the user while the contractual relationship causing its exchange is maintained or for the necessary years in order to comply with the legal obligations or to fulfill the responsibilities that may be derived from it.

The data provided by the user as a result of the maintenance of this contractual relationship are extendable, not only to the data of the signatories of the corresponding license, but also to the data that may be necessary for the attainment of the contractual relationship, such as for example other contact persons of the user company in order to be able to process any incidence, the data of users requested by the administrator, or any other circumstance for which it is necessary for ClarkeModet to process the data of the employees of the user.

ClarkeModet may send to the user information related to the activity of ClarkeModet, either to inform about novelties about their products or updates or to send information about services marketed by the company. The legal basis of the processing for this purpose is the legitimate interest of ClarkeModet, and the client may at all times communicate his/her desire to not receive this type of information.

Contact data for queries

It is possible for there to be proprietors of data that contact ClarkeModet through on-line forms or by means of sending emails to addresses of the Company. Said data, provided by the user,

will be processed by ClarkeModet to give a reply to the corresponding query, so the legitimate basis for the processing will be the compliance of the contractual relationship or by default, the consent, since it is the user himself/herself who wishes to contact ClarkeModet.

ClarkeModet will keep the data provided by the proprietor, provided that the latter does not exert his/her right of elimination or opposition. In this sense, ClarkeModet may process the data to send him/her information related to the activity of ClarkeModet, either to inform about novelties about its products or updates or to send information about services marketed by the company. The legal basis of the processing for this purpose is the legitimate interest of ClarkeModet, and the client may at all times communicate his/her desire to not receive this type of information.

The rights of the proprietors of the data

Likewise, the user or the proprietor of the data has the right to obtain confirmation of whether ClarkeModet is processing his/her personal data and, therefore, has the right to access his/her personal data, rectify the inaccurate data or request their elimination when the data are no longer necessary; he/she may also request the limitation in the use thereof and file the complaints in his/her best interest by going to the corresponding control authority. He/she must do so by sending a communication to:

- ClarkeModet, Calle Suero de Quiñones, 34, 28002 Madrid
- By email to dpo@clarkemodet.com

Data processing by third parties

The Platform does not store data of a personal nature with the exception of the data of the user himself/herself. i.e. ClarkeModet will not process any data of a personal nature that is the user's responsibility and is contained in the "hashes" created by the user in the platform for the generation of the evidences in the digital files.

Data processing in the digital file hashing process

ClarkeModet does not store the digital files, but only stores the hashes corresponding to the digital files selected by the users and stored in their own devices or servers.

The digital files may or may not contain personal data, however ClarkeModet will not have access to them and will not process them, and will not pass personal data through the blockchain networks, but only the hash corresponding to the file object of registration.

Data veracity and update

ClarkeModet assumes that the personal data provided through the different channels and supports are true, that they are directly supplied by the proprietor, that the latter is who he/she

says he/she is, that the data are updated, that the affected/interested party will communicate any modification of his/her data as soon as it occurs.

Data communication

The data will not be transferred to third parties, unless said data transfer is necessary in compliance with the contractual relationship with the data's proprietor and unless it is to the public organizations in the case of compliance of the legal obligations of the company. Furthermore, it is possible for the company to communicate data to third parties in charge of the processing, for ClarkeModet to access said information in order to provide its services, in these cases ClarkeModet will have the due contract of person in charge of the processing which ensures the integrity and confidentiality of the information.

Duty of secrecy

The persons who are involved in the processing of data concerning natural persons and who access, directly or indirectly, the files, will observe at all times the secrecy with respect to the personal data that they get to know in the development of the activity. The Duty of Secrecy constitutes an obligation for ClarkeModet, the members of supervision and management organizations, the persons hired in labor law regime, the service-providing professionals hired in commercial law regime. It is also an obligation for the providers of goods and services and their employees, subcontracted by the Person in Charge of the Processing and the employees thereof. The obligation of secrecy will continue after the end of labor or commercial relationship established with ClarkeModet, the entity responsible for the processing, as well as after the expiration of the labor, commercial contracts, etc., which link the employees and/or professionals with the Person in Charge of the Processing and the providers which supply goods or provide services to ClarkeModet.