



## **PRIVACY POLICY**

The Group Kube and all its member companies is committed to the protection of personal information. Our Privacy Policy is compliant with current legislation on data protection, in particular with General Data Protection Regulation (EU) 2016/679 (GDPR).

This Privacy Policy applies to the personal data of our web users, consultants, clients, suppliers and any third party (the "data subject") maintaining a relationship with Kube and whose personal data should be treated.

Kube have implemented appropriate technical and organisational measures for ensuring the availability, authenticity, integrity, confidentiality and security of stored or transmitted personal data, and privacy of the personal data collected, and its integrity, availability and security.

Personal data are processed lawfully, fairly and in a transparent manner. Personal data are collected with the explicit consent of the data subject, after being informed of the purposes of the data processing, expressly indicated in this Privacy Policy or through legal or contractual legitimation.

Kube does not process or share personal data of data subject, only if and to the extent that processing is necessary for compliance with a legal obligation, for the performance of a contract to which the data subject is party, at the request of competent authorities, or if the data subject has given previous and specific consent for the data processing.

Kube will only use personal data of data subject for the specific purposes for which the personal data have been collected.

Kube will store personal data of data subject only for the period strictly necessary for the processing purposes, provided that they are appropriate, pertinent and necessary.

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This Privacy Policy applies to our web users, consultant, clients and suppliers.

#### CONSULTANTS' PERSONAL DATA

Any candidate who submits his or her resume to any member of Kube, or any of its companies, to participate in the recruitment processes of consultants, expressly authorizes any member of Kube to transfer his or her personal data to its clients. In the early stage of the recruitment process, any member of Kube sends resumes without personal data to prevent the identification of the candidates.

Consultants' personal data will be entered into an automated file under Kube' responsibility. The purpose of this processing is to facilitate, expedite and fulfil the commitments established with the consultants.

#### CLIENTS' PERSONAL DATA

Kube only collects client's data adequate, relevant and limited to what is necessary to maintain a fluid relationship with our clients (contact person, email, telephone, address).

Clients' personal data will be entered into an automated file under Kube' responsibility. The purpose of this processing is to facilitate, expedite and fulfil the commitments established with the clients.

#### SUPPLIERS' PERSONAL DATA

Kube only collects suppliers' data adequate, relevant and limited to what is necessary to maintain a fluid relationship with our suppliers (contact person, email, telephone, address, and bank information needed to pay their services).

Suppliers' personal data will be entered into an automated file under Kube' responsibility. The purpose of this processing is to facilitate, expedite and fulfil the commitments established with the suppliers.

#### INTERNATIONAL TRANSFER OF PERSONAL DATA

Kube uses services of third-parties to manage the data of its consultants, clients and suppliers (Google, Bullhorn, Dropbox, etc.). The personal data can be transferred to a third country outside the European Union.

These servers and platforms, even outside the European Union, comply with the European legality and ensure an adequate level of protection of the personal data transferred, in particular through the certification in Privacy Shield.

By accepting this Privacy Policy, the data subject expresses his or her consent to the transfer of his or her personal data to said third parties for their storage and better management of the services provided by Kube.

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## RIGHTS OF THE DATA SUBJECT

Any data subject may, at any time, withdraws his or her consent to the processing of his or her personal data, and / or exercises his or her rights of access, rectification, erasing, restriction, objection and portability provided in the RGPD, by email sent to [compliance@kube.group](mailto:compliance@kube.group), or by postal letter addressed to Kube Partners, Plaza Urquinaona, 6, 9<sup>ª</sup>A, 08010 Barcelona (Spain).

The data subject must indicate the right he or she wishes to exercise and attach a copy of his or her ID or any valid identification document.

- Right of access

The data subject has the right to obtain information to access to his or her personal data and the following information: the purposes of the processing; the categories of personal data concerned; the envisaged period for which the personal data will be stored, or the criteria used to determine that period; the recipients to whom the personal data have been or will be disclosed; the existence of automated decision-making, including profiling, and meaningful information about the logic involved, as well as the significance and the envisaged consequences of such processing for the data subject. The data subject is entitled to exercise his or her right with no justification, unless he or she has exercised it in the last six months.

Kube will provide information to the data subject without undue delay and in any event within one month of receipt of the request. That period may be extended by two further months where necessary, taking into account the complexity and number of the requests. The information shall be provided in writing, or by other means, including, where appropriate, by electronic means.

- Right to rectification

The data subject has the right to obtain from Kube the rectification of inaccurate personal data concerning him or her, including by means of providing a supplementary statement.

Kube will provide information to the data subject without undue delay and in any event within one month of receipt of the request. That period may be extended by two further months where necessary, taking into account the complexity and number of the requests.

- Right to erase, Right to be forgotten

The data subject has the right to obtain from Kube the erasure of his or her personal data when (i) the personal data have been unlawfully processed; (ii) the data subject withdraws consent or objects to the processing and there are no overriding legitimate grounds for the processing; (iii) the personal data are no longer necessary in relation to the purposes for which they were collected or otherwise processed; or (iv) the personal data have to be erased for compliance with a legal obligation.

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The data subject won't have the right to obtain from Kube the erasure of his or her personal data when that processing is necessary (i) for exercising the right of freedom of expression and information; (ii) for compliance with a legal obligation which requires processing; (iii) for the establishment, exercise or defence of legal claims; (iv) for reasons of public interest in the area of public health; or (v) for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes.

Kube will answer the request without undue delay and in any event within one month of receipt of the request. That period may be extended by two further months where necessary, taking into account the complexity and number of the requests.

- Right to object

The data subject has the right to object, at any time, to processing of his or her personal data (i) on grounds to his or her particular situation; (ii) where personal data are processed for direct marketing purposes; (iii) when the interests, rights and freedoms of the data subject override the interests of Kube or third parties in processing his or her personal data.

Kube will answer the request without undue delay and in any event within one month of receipt of the request. That period may be extended by two further months where necessary, taking into account the complexity and number of the requests.

- Right to restriction of processing

The data subject has the right to obtain from Kube restriction of processing where (i) the accuracy of the personal data is contested by the data subject, for a period enabling Kube to verify the accuracy of the personal data; (ii) the data subject has objected to processing pending the verification whether the legitimate grounds of Kube override those of the data subject; (iii) the processing is unlawful and the data subject opposes the erasure of the personal data and requests the restriction of their use instead; (iv) Kube no longer needs the personal data for the purposes of the processing, but they are required by the data subject for the establishment, exercise or defence of legal claims.

Kube will answer the request without undue delay and in any event within one month of receipt of the request. That period may be extended by two further months where necessary, taking into account the complexity and number of the requests.

- Right to data portability

The data subject has the right to receive the personal data concerning him or her, which he or she has provided to Kube, in a structured, commonly used and machine-readable format. The data subject has the right to transmit those data to another third party, where the processing is based on consent or on a contract. The data subject has the right to have the personal data transmitted directly from Kube to the third party.

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This right shall not apply to processing necessary for the performance of a task carried out in the public interest; when it is not technically feasible; or when it can adversely affect the rights and freedoms of others.

Kube will answer the request without undue delay and in any event within one month of receipt of the request. That period may be extended by two further months where necessary, taking into account the complexity and number of the requests.

- Right to lodge a claim with a supervisory authority

The data subject has the right to lodge a claim with the local supervisory authority concerned.

#### DATA CONTROLLER

This web is under the responsibility of Kube Partners, S.L., Spanish company established in Barcelona, Plaza Urquinaona, 6, 9ªA, registry number B67350488, mail [compliance@kube.group](mailto:compliance@kube.group).

Kube may modify and update this Privacy Policy at any time.