

## PRIVACY POLICY 2024

**Identity:**

The vehicle rental service by minutes via the App (“motosharing”) is provided by the company COOLTRA MOTOSHARING, S.L.U. with registered address in Edificio Ocean, Passeig Joan de Borbó 99-101, 4ª Planta, 08039 de Barcelona, and with Company Tax Code B-65874877. Locally, the motosharing service is provided and the rentals are formalized with the Cooltra subsidiaries listed below and in the General Terms and Conditions of use of the motosharing service.

The vehicle rental service by days/months via the Website (“rental”) is provided by the company COOLTRA MOTOS, S.L.U. with registered address in Edificio Ocean, Passeig Joan de Borbó 99-101, 4ª Planta, 08039 de Barcelona, and with Company Tax Code B-64146632. Locally, the renting service is provided, and the rentals are formalized with the Cooltra subsidiaries listed below and in the General Terms and Conditions of Vehicle Rental.

Hereinafter, both companies jointly referred to as "Cooltra" and both services jointly referred to as the "Service".

Postal address: Edificio Ocean, Passeig Joan de Borbó 99-101, 4ª Planta, 08039 de Barcelona

**Email:** [rgpd@cooltra.com](mailto:rgpd@cooltra.com) ; [gdpr@felyx.com](mailto:gdpr@felyx.com)

**Data Protection Officer:** AURIS ADVOCATS

DPO Contact: Xavier Saula Adell. Calle Pau Claris 154, 2, 08009 Barcelona.

Website: [www.aurisadvocats.com](http://www.aurisadvocats.com). Email: [xavi@aurisadvocats.com](mailto:xavi@aurisadvocats.com)

**COOLTRA MOTOSHARING SLU**, as the App data controller and **COOLTRA MOTOS SLU** as the Website data controller, as pursuant to the provisions established in Regulation (EU) 2016/679 of 27 April 2016 (GDPR) on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and other applicable data protection regulations, hereby informs you that it has implemented the necessary technical and organisational security measures in order to guarantee and protect the confidentiality, integrity and availability of the data entered.

**COMPANIES ASSOCIATED WITH THE COOLTRA MOTOS GROUP**

	Name	Tax number	VAT number	Company Address	Fiscal Address
<b>SPAIN</b>	COOLTRA MATRIZ SL	B67123356	ESB67123356	Edificio Norrsken Barcelona,	Edificio Norrsken Barcelona,

				Passeig del Mare Nostrum, 15 08039 Barcelona, España	Passeig del Mare Nostrum, 15 08039 Barcelona, España
	Cooltra Inversion Motos SL	B67131797	ESB67131797	Edificio Norrsken Barcelona, Passeig del Mare Nostrum, 15 08039 Barcelona, España	Edificio Norrsken Barcelona, Passeig del Mare Nostrum, 15 08039 Barcelona, España
	Cooltra City Services SLU	B67202036	ESB67202036	Edificio Norrsken Barcelona, Passeig del Mare Nostrum, 15 08039 Barcelona, España	Edificio Norrsken Barcelona, Passeig del Mare Nostrum, 15 08039 Barcelona, España
	Cooltra Mantenimiento y Talleres, SLU	B65874828	ESB65874828	Edificio Ocean, Passeig Joan de Borbó 99-101, 4ª Planta, 08039 de Barcelona	Edificio Ocean, Passeig Joan de Borbó 99-101, 4ª Planta, 08039 de Barcelona
	Cooltra Motos Headquarter SL	B67202028	ESB67202028	Edificio Ocean, Passeig Joan de Borbó 99-101, 4ª Planta, 08039 de Barcelona	Edificio Ocean, Passeig Joan de Borbó 99-101, 4ª Planta, 08039 de Barcelona

	Cooltra Motos SLU	B64146632	ESB64146632	Edificio Ocean, Passeig Joan de Borbó 99-101, 4ª Planta, 08039 de Barcelona	Edificio Ocean, Passeig Joan de Borbó 99-101, 4ª Planta, 08039 de Barcelona
	Cooltra Motosharing SLU	B65874877	ESB65874877	Edificio Ocean, Passeig Joan de Borbó 99-101, 4ª Planta, 08039 de Barcelona	Edificio Ocean, Passeig Joan de Borbó 99-101, 4ª Planta, 08039 de Barcelona
	Cooltra Motos Canarias SLU	B65874919	ESB65874919	Avda. Antonio Domínguez Alfonso, Residencial El Camisón, Local nº 8, BL. V, Playa de las Americas, Arona, 38,650 S/C de Tenerife	Avda. Antonio Domínguez Alfonso, Residencial El Camisón, Local nº 8, BL. V, Playa de las Americas, Arona, 38,650 S/C de Tenerife
	EOS SMART CONNECTIVITY, S.L.	B01985332	ESB01985332	Edificio Norrsken Barcelona, Passeig del Mare Nostrum, 15 08039 Barcelona, España	Edificio Norrsken Barcelona, Passeig del Mare Nostrum, 15 08039 Barcelona, España

<b>FRANCE</b>	Cooltra Motos France SARL	811 185 339 00066	FR47811185339	Parc des Docks, Lot 561-B Rue Ardoin 93 400 Saint-Ouen -SUR-SEINE	Parc des Docks, Lot 561-B Rue Ardoin 93 400 Saint-Ouen
	Cooltra Scooter Sharing France SARL	897 881 413 00024	FR35897881 413	Parc des Docks, Lot 561-B Rue Ardoin 93 400 Saint-Ouen	Parc des Docks, Lot 561-B Rue Ardoin 93 400 Saint-Ouen
<b>ITALY</b>	Cooltra Motos Italia SRL	1273125100 0	IT12731251000	Via Monti Tiburtini 509 - 00157 Roma	Via Monti Tiburtini 509 - 00157 Roma
	Ecooltra Scootersharing Italia SRL	02224560561	IT02224560561	Via Monti Tiburtini 509 - 00157 Roma	Via Monti Tiburtini 509 - 00157 Roma
<b>PORTUGAL</b>	COOLTRAMOTOS, UNIPESOAAL LDA	NIPC 513891030	PT513891030	Rua da Guiné N25 CV 2685-336 Prior Velho-Loures, Portugal	Rua da Guiné N25 CV 2685-336 Prior Velho-Loures, Portugal
	Ecooltra Scootersharing Portugal, Unipessoal LDA	NIPC: 514108614	PT514108614	Rua da Guiné N25 CV 2685-336 Prior Velho-Loures, Portugal	Rua da Guiné N25 CV 2685-336 Prior Velho-Loures, Portugal
<b>AUSTRIA</b>	Cooltra Motos Austria GmbH	09 298/7197	ATU72553248	Neuer Markt 1 / 17 1,010 Wien	Neuer Markt 1 / 17 1,010 Wien
<b>CZECH REPUBLIC</b>	COOLTRA MOTOS CZECH	07615043	CZ07615043	ANTALA STASKA 1859/34 - 14000	ANTALA STASKA 1859/34 - 14000

	REPUBLIC S.R.O.			PRAHA (CZECH REPUBLIC)	PRAHA (CZECH REPUBLIC)
<b>POLAND</b>	COOLTRA MOTOS POLAND Szoo	PL7011069051	PL7011069051	Biuro Kamienica, Marszałkowska 58	Biuro Kamienica, Marszałkowska 58
<b>GERMANY</b>	COOLTRA MOTOS DEUTSCHLAND GmbH	Steuernummer (StNr.) 5105/5808/5811	DE355650307	Theodorstr. 105 40472 Düsseldorf	Theodorstr. 105 40472 Düsseldorf
<b>BELGIUM</b>	COOLTRA MOTOS BELGIUM SRL	1007457341	BE1007457341	Quellinstraat 49, 2018 Antwerpen	Quellinstraat 49, 2018, Antwerpen
	FELYX BELGIUM B.V.	0720798585	BE0720798585	Rue des Vétérinaires 42A, 1070 Anderlecht. Module B1-100-01a	Rue des Vétérinaires 42A, 1070 Anderlecht. Module B1-100-01a
<b>NETHERLANDS</b>	COOLTRA MOTOS NETHERLANDS B.V.	866744174		Joan Muyskenweg 22, 1096 CJ Amsterdam	Joan Muyskenweg 22, 1096 CJ Amsterdam
	FELYX NETHERLANDS B.V.	75469758	NL860294535B01	Joan Muyskenweg 22, 1096 CJ Amsterdam	Joan Muyskenweg 22, 1096 CJ Amsterdam

This Privacy Policy applies to the processing of the User's data by Cooltra and its Local Subsidiaries.

For each city in which Cooltra operates, the Service will be provided locally by a Cooltra Local Subsidiary, to which it will communicate the User's data necessary for such provision and the corresponding invoicing. The Additional Privacy Terms and Conditions indicated in section G below shall apply to each Local Subsidiary.

Furthermore, in addition to this Privacy Policy, you may also consult the Terms and Conditions of Use available on the corresponding section of the website and app.

**Cooltra guarantees the protection of all the personal data provided by Users to Cooltra, to its Local Subsidiaries from the activation and during the use of the Service and pursuant to the provisions established in Applicable Data Protection Laws and, in**

particular, in REGULATION (EU) 2016/679 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL of 27 April 2016:

- A. **Files.** All personal data provided by the User and/or collected by Cooltra through the activation, registration and use of the Service shall be included in one or more files created and maintained under the responsibility of Cooltra,
- B. **Data collected.** Cooltra collects the following personal data:
  1. REGISTRATION: during the registration as a user, Cooltra collects the following data: name, surname, e-mail, residence address, billing address, telephone, ID, ID or passport, driving license, debit/credit card and selfie photo for identity verification.
  2. USE OF THE SERVICE: during the use of the service by the user, Cooltra collects the following data: rental start date, time and place, rental end date, time and place and actions performed with the vehicle sensors (seat, bicycle rest, on/off/paused).
  3. NOTIFICATIONS/CLAIMS: any other specific data notified by the User during the course of the correspondence with Cooltra for the purpose of contacting and/or resolving any claims with Cooltra.

**Consent.** By registering to use the service, the User authorises and consents to the processing of their personal data, in the terms indicated above, by marking the acceptance box located at the end of the User’s Service registration. The User certifies that they are at least 18 years of age and therefore has the legal capacity required to give unequivocal consent in terms of the processing of their personal data and all in accordance with the provisions established in this Privacy Policy.

- C. **Purposes and legal legitimacy to process your information.** Your personal data are collected for the following purposes:

Purpose of processing Why do we collect your information?	Lawful basis for processing your personal information
Managing rental requests, providing the Customer with the tools required to enjoy the Service	(1) Performance of the contract (2) Express consent of the data subject
Registering as a website user or new customer	(1) Express consent of the data subject (2) Performance of the contract
Managing our relationship with our customers, which includes: (1) Notifying customers of any changes to our contract terms and conditions or policies (2) Request customers to complete a survey or to rate our products/services.	(1) Performance of the contract (2) Fulfilment of a legal obligation (3) Consent of the data subject

<p>Verify your identity: In order to enjoy our services, when registering for the service, you will have to provide a “selfie” so we can verify your ID document or passport or your driving licence.</p>	<p>(1) Performance of the contract (2) Express consent of the data subject</p>
<p>To comply with legal, accounting, tax, administrative and contractual obligations related to the provision of the requested services.</p>	<p>Fulfilment of a legal obligation</p>
<p>To process the payment for the Service via the Service payment platform</p>	<p>1) Performance of the contract (2) Express consent of the data subject</p>
<p>In order to prepare measures aimed at mitigating risk exposure in trade transactions, which involve identifying customers/users, and their economic objective.</p>	<p>In our own legitimate interest and that of third parties, for example, to ensure that customers will be able to pay.</p>
<p>To provide information to Users about the products and services sold by Cooltra.</p>	<p>(1) Express consent of the data subject</p>
<p>To analyse, improve and optimise the use of the Service. And to have use of a device that enables information relating to the manner in which the motor vehicle is driven by drivers, and for video evidence in the event of claims.</p>	<p>(1) Express consent of the data subject (2) Own legitimate interest</p>
<p>To prepare a motor vehicle GPS tracking system and the measures to protect the ownership of the Cooltra fleet, with the aim of protecting Cooltra against any acts performed by unlawful or fraudulent third parties.</p>	<p>(1) Express consent of the data subject (2) Own legitimate interest</p>
<p>Resolve claims, incidents or queries through the channels enabled for said purpose: Contact Form, Online Chat, email and customer service telephone line.</p>	<p>(1) Consent of the data subject (2) Performance of the contract</p>
<p>For marketing purposes:  a) To provide Users with commercial information on offers and promotions launched by Cooltra, which may be of interest to them by e-mail, SMS, WhatsApp or other means of communication (unless</p>	<p>(1) Express consent of the data subject (2) Own legitimate interest (provided you have not expressed your wish to stop receiving communications, 'opt-out').  In order to provide you with personalised information or services on our app and to</p>

<p>they have opted out by unsubscribing at the bottom of each commercial e-mail, by sending an e-mail to <a href="mailto:rgpd@cooltra.com">rgpd@cooltra.com</a>, <a href="mailto:gdpr@felyx.com">gdpr@felyx.com</a> under the subject “unsubscribe to newsletter”)</p> <p>The sectors on which we can inform Users are the following: transport of all kinds, tourism and travel, renewable energies, IT and new technologies, food, leisure, training and education, publishing, finance and credit, insurance, legal assistance, telecommunications, automotive, FMCG, health, personal care, electronics, water, energy, textiles and NGOs.</p> <p>We may also send you this information via push notifications if you have activated them on your device (to unsubscribe you must do this through your mobile application settings).</p> <p>Therefore, please note that this data processing involves the analysis of your user profile to determine what your preferences are and therefore which products and services may be most suitable for you when sending you information.</p> <p>b) This purpose includes the processing of your data for, primarily:</p> <p>To personalise the services we offer you and to be able to make recommendations to you based on your interaction with us through the app (via pop-up messages, push notifications or messages displayed from the message centre in your profile) and analysis of your user profile.</p>	<p>commit to data improvement, we consider that we have a legitimate interest in profiling the information we have about you (such as your browsing, preferences or booking history) and the personal data you have provided us with such as age range, language, etc. as we understand that the processing of this data is also beneficial to you because it improves your user experience and access information based on your preferences.</p>
<p>To carry out the necessary commercial and administrative procedures with the users of the website.</p>	<p>(1) Consent of the data subject (2) Performance of the contract</p>

Managing requests for motorbike rental, purchase, accessories, booking of excursions, tours, guided tours, rental of mopeds, bicycles and electric bicycles.	(1) Express consent of the data subject (2) Performance of the contract
To process payments through the Website's own Online Store.	(1) Express consent of the data subject (2) Performance of the contract
Provide services and/or services contracted or signed by the User.	(1) Express consent of the data subject (2) Performance of the contract
Managing our relationship with our customers, which includes:  1) Notifying them of changes, important developments relating to the privacy policy, legal notice or cookies policy.  2) Request customers to complete a customer satisfaction survey or to rate our products/services.	(1) Performance of the contract  (2) Fulfilment of a legal obligation  (3) Own legitimate interest (to update our records and know the opinion of our customers regarding our products/services).
In order to improve our Service, profiling and usage analysis will be carried out based on the user's booking history. In addition, analytical data will be used to improve the web browsing/app usage experience, implement marketing strategies and optimise recruitment processes through the use of cookies.	(1) Own legitimate interest (2) Consent of the data subject (e.g. by accepting the use of analytical cookies).
Manage and protect our business and our website. This includes identifying browsing issues, data analysis, website/app tests, etc.	(1) Fulfilment of a legal obligation (2) Own legitimate interest (overseeing our company, protecting our networks, preventing fraud, etc.)
Carrying out promotional actions. By participating in any promotional action (promotions, contests or giveaways offered by the Cooltra Group), you authorize us to process the data you provide depending on each promotional action and we can communicate them through various media such as social networks. For each promotional action you participate in you will have available the legal bases where we will provide you with more detailed information about the processing of your data.	(1) Consent of the data subject
Managing user interactions on our social networks	(1) Compliance with a legal obligation (e.g. to remove offensive, racist,

	<p>profane or abusive comments; to maintain an atmosphere of respect and integration, to preserve the privacy of minors, etc.).</p> <p>(2) Own legitimate interest (when we remove third-party advertising from our networks, for example).</p>
Providing information to authorities or as a result of a court order.	Fulfilment of a legal obligation
Improve the security of our physical facilities (installation of CCTV cameras/video surveillance),	In legitimate interest and in the interest of third parties. For example, to identify the commission of an act harmful to our employees or customers.
Credit check through external agencies	In our own legitimate interest and that of third parties, for example, to ensure that customers will be able to pay
<p>Follow-up of procedures for dispute resolution in line with the European Commission, in particular under the ODR platform:</p> <p><a href="http://ec.europa.eu/consumers/odr/">http://ec.europa.eu/consumers/odr/</a></p> <p>Follow-up of user claims and procedures before Consumer Agencies (registration with identification key)</p>	Fulfilment of a legal obligation
Cooltra City Services (bike sharing) for local councils	(1) Performance of the contract
If the user uses the additional service to store their credit card details, or if said card has expired or the details have changed, should the user's credit card issuing bank offer an update service for the account associated with the card, and if the user has given said bank their permission, Cooltra may obtain the updated information in order to minimise the risk of payments with the credit card being rejected if the card expires or the details change. Cooltra will receive the updated credit card details in accordance with the prior authorization you have given to the issuing bank.	<p>(1) Consent of the data subject to their Bank</p> <p>(2) Performance of a contract (so that Cooltra can provide the service).</p>

Cooltra shall not use the personal data made available by the User/Customer to provide services other than those mentioned or, if applicable, for its own use or other than the use authorised by the owner of said data. Users may revoke their consent at any given time by sending a written notice with the subject "Withdrawal" to [rgpd@cooltra.com](mailto:rgpd@cooltra.com)/[gdpr@felyx.com](mailto:gdpr@felyx.com), or by unsubscribing via the app. In regards to commercial email communications, you may also unsubscribe at the bottom of each commercial email.

To unsubscribe from push notifications, you will need to do so through your mobile application settings. By cancelling them, all push notifications will be stopped including marketing, service notifications from the Cooltra app, as well as personalised offers and promotions from Cooltra to your device.

Cooltra shall not employ SPAM tactics, therefore, they shall not send commercial emails that have not been previously requested or authorised by the User. Accordingly, in all correspondence received from Cooltra, the user shall be able to expressly choose not to receive our correspondence.

**D. Cancellation of User Account.** The user may, at any given time, delete their account and the data associated with the same. In these cases, Cooltra undertakes not to use said information other than for the retention obligations imposed by Data Protection Laws. The user may also cancel their payment services at any given time, without cancelling their user account. The cancellation of the payment services and the account cancellation, as well as the cancellation of the Newsletter, or push notifications, are independent cancellation processes, with each having a specific procedure enabled for said purpose.

**E. Data retention.** Cooltra shall retain the user's data for use exclusively for the duration of the contractual relationship. The duration of the relationship is indefinite. As established in section D, once the user cancels the user account, Cooltra agrees not to use said information other than for retention obligations imposed by Data Protection Laws. Therefore, Cooltra reserves your personal data, adopting technical and organisational measures, to prevent their processing, including their visualisation, except for the purpose of making the data available to judges and courts, the Public Prosecutor's Office or the competent Public Administrations, in particular the data protection authorities, for the enforcement of possible liabilities arising from the processing and only for the period of limitation of the same (depending on the type of liability and the country of origin of the user). After this period Cooltra will destroy the data. The blocked data may not be processed for any purpose other than that indicated in the previous section.

#### – Data retention periods

You are hereby informed that our data retention policies conform to the periods established by legal responsibilities in terms of prescription based on the country of origin, and in all cases, data shall be definitively destroyed once the legally required period has prescribed. For more information on how long we keep your personal data, please send us an email to [rgpd@cooltra.com](mailto:rgpd@cooltra.com), [gdpr@felyx.com](mailto:gdpr@felyx.com) .

**F. Confidentiality.** Cooltra agrees to keep strictly private and confidential and not to disclose all private and personal information we may access. The technical and organisational measures established in the data protection regulation have been implemented by Cooltra, based on the type of data being processed at any given time. In the collection and processing of personal data, the appropriate security measures have been implemented, in order to avoid the loss, unauthorised access or handling of the same, pursuant to the provisions established in the abovementioned regulation.

In accordance with the provisions established in REGULATION (EU) 2016/679 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL of 27 April 2016 and all other applicable Data Protection regulations, Cooltra as the party responsible for the files, hereby informs users that the personal data provided by users during their relationship with our company, including their email address and any personal data we may access during the established relationship, shall be processed in one or more of the files in accordance with the provisions established in existing laws.

**G. Assignments:** Cooltra shall assign User data indicated in section (B) to:

- One or more of Cooltra’s Local Subsidiaries (entities indicated Annex 1 of the Service General Terms and Conditions) for the purposes indicated in section (C) and, in particular for the reservation, rental, management and local provision of the Cooltra vehicle rental Service and for the issuance of invoices and the notification of offers and other local promotions.
- Insurance companies involved in a claim in which a Cooltra vehicle is involved.
- Specialised debt collection companies.
- Companies specialising in commercial information management.
- Companies involved in vehicle rental and/or ancillary services with which Cooltra has agreements.
- Companies contractually associated with Cooltra responsible for managing claims.
- Third parties that we need to manage our business (marketing services, accountants, administrative and fiscal assistants who are contractually associated with us via a data processing contract).
- Third party companies subcontracted by us or service providers we use to provide our services. For example, payment gateway providers.

The data may be transferred to the competent public administrations. Including, but not limited to, always in accordance with the applicable regulations in the different countries in which Cooltra offers its services, Cooltra is legally obliged to assign your data in the event of committing a traffic or parking offence:

In Spain, Article 11 of **Royal Legislative Decree 6/2015, of 30 October, which approves the consolidated text of the Law on Traffic, Circulation of Motor Vehicles and Road Safety.**

In France Article L121-6 of the **Code de la route.**

In Italy, Article 126 bis of the **Codice Della strada.**

In Portugal Article 171 of the **Codigo da Estrada**

Likewise, data may be assigned in the event of the purchase of all or a substantial part of **Cooltra’s** assets, or the restructuring of the **Cooltra** corporate group. Said data assignment would be performed in strict compliance with the provisions established in the applicable Data Protection regulation.

Collaborating companies: Cooltra may share data with third party companies as joint controllers. All these companies are contractually bound to us. We can guarantee that they comply with all necessary security measures to safeguard your personal

information, and that they will use your personal data only and exclusively for the specified purposes, in accordance with our instructions. At present, the current collaborating companies are: Cabify, Free Now, Doco, Urbi and Telepass.

With the exception of the foregoing, there should be no other data assignments, except those established by other laws or competent public administrations.

Where is your personal information hosted?

Information you provide through this website and the application will be hosted on the Amazon Web Services servers: <https://aws.amazon.com/es/>.

**H. Data Subject's Rights.** As user-data subject, you may send a request to exercise the following rights before "COOLTRA" by writing to the postal address indicated at the beginning or by sending an email to [rgpd@cooltra.com](mailto:rgpd@cooltra.com) , [gdpr@felyx.com](mailto:gdpr@felyx.com) , indicating the following in the Subject line: "GDPR, Rights affected", and attaching your data and the rights you wish to assert.

**Rights:**

- **Right of access:** allows data subjects to know and obtain information about the categories of their personal data processed.
- **Right to rectification or deletion:** allows errors to be rectified and inaccurate or incomplete data to be modified or completed.
- **Right to erasure:** allows inadequate or excessive data to be eliminated.
- **Right to object:** right of the data subject to object to the processing of their personal data and for the processing to cease.
- **Right restriction of processing:** entails marking the retained personal data, with the aim of restricting future processing.
- **Right to data portability:** enables data subjects to obtain their personal data being processed, in order to transmit their data to another data controller, without impediment.
- **Right not to be subject to a decision based solely on automated processing (including profiling):** right not to be subject to a fully automatic decision that has legal effects or significantly affects the person in question.

As user, you have the right to withdraw the consent given at any given time. The withdrawal of consent shall not affect the lawfulness of the processing performed prior to the withdrawal of consent.

If you think your data protection rights have been breached, you are entitled to lodge a complaint with the corresponding supervisory authority in your country of origin.

**I. Social Networks.** We inform you that Cooltra may have a presence on social networks. The processing of data of the followers on the social networks (and/or make any link or action of connection through the social networks) of the official pages of Cooltra will be governed by this section, as well as by those terms and conditions of use, privacy policies

and access regulations that belong to the social network applicable in each case and previously accepted by the user.

Cooltra shall process your data for the purposes of properly managing your presence on the social network, informing you of activities, products or services of Cooltra, as well as for any other purpose that the regulations of the social networks allow.

It is prohibited to publish content:

- That is suspected of being unlawful under national, community or international law or of engaging in activities that are suspected of being unlawful or of contravening the principles of good faith.
- That violates the fundamental rights of persons, lack of courtesy in the network, disturbs or may generate negative opinions in our users or third parties and in general any content that Cooltra considers inappropriate.
- And in general, that contravenes the principles of legality, honesty, responsibility, protection of human dignity, protection of minors, protection of public order, protection of privacy, consumer protection and intellectual and industrial property rights.

Cooltra also reserves the right to remove, without prior notice, from the website or the corporate social network content that is considered inappropriate.

The communications sent through social networks shall be incorporated into a file owned by Cooltra, to be able to send you information of interest you.

At any time you may exercise your rights of access, rectification, opposition, limitation and, where appropriate, portability or cancellation, by writing and indicating your personal data to the address [rgpd@cooltra.com](mailto:rgpd@cooltra.com), [gdpr@felyx.com](mailto:gdpr@felyx.com) .

In any case, if you send personal information through the social network, Cooltra shall be exempt from liability in relation to the security measures applicable to this platform, and the user, if they want to know them, should consult the corresponding particular terms and conditions of the network in question.

**J. Means of communication enabled.** The sole means of communication enabled between Cooltra and the User are: fixed-line telephone, company mobile phones, corporate mail, registered address and social media.

If you send personal information through a means of communication other than those indicated in this section, the COMPANY shall be exempt from liability in relation to the security measures offered by the means of communication in question.

**K. Communications and Notifications.** Any communication sent shall be incorporated into Cooltra's information systems. By accepting these terms, conditions and policies and, in particular, when the User sends their personal data to Cooltra, the User expressly consents to Cooltra performing the following activities and/or actions, unless indicated otherwise by the User when entering into a contact for a Cooltra product and/or service or as a result of a subsequent revocation of the consent initially given.

- The sending of commercial and/or promotional communications informing the users of the activities, services, promotions, advertising, news, offers and other

information about the services and products related to the activity and provision of services of Cooltra.

- In case the User has expressly consented to the sending of commercial communications by electronic means by subscribing to them, the sending of such communications informing the Users of the activities, services, promotions, advertising, news, offers and other information about services and products of Cooltra or collaborating companies equal or similar to those that were initially contracted or of interest to the User.
- The retention of data during the periods established in applicable laws.

**L. Personnel selection.** In compliance with the provisions of Regulation (EU) 2016/679 of 27 April 2016 (GDPR), we inform you that the personal data provided shall be processed by Cooltra, with registered office at Edificio Ocean, Passeig Joan de Borbó 99-101, 4<sup>a</sup> Planta, 08039 de Barcelona (Data Controller).

The data provided shall be processed for the sole purpose of involving the interested party in the personnel selection processes currently open or for future processes in which the candidate may fit, and may not be used for other purposes. In the event of any changes to your data, please notify us in writing as soon as possible, so that we can keep your data up to date. The data shall not be disclosed to third parties, except where required by law.

The data shall be kept for a maximum period of two years, after which time they shall be deleted, guaranteeing total respect for confidentiality both in the processing and in their subsequent destruction.

We also inform you that you have the right to request access, rectification, portability and deletion of your data and the limitation and opposition or by sending an email to [rgpd@cooltra.com](mailto:rgpd@cooltra.com), [gdpr@felyx.com](mailto:gdpr@felyx.com), indicating the type of right you wish to exercise and accompanying your request with a copy of your ID card or similar document in law. If you consider that the processing of personal data does not comply with the applicable regulations, you also have the right to lodge a complaint with the supervisory authority [www.agpd.es](http://www.agpd.es).

**M. Video surveillance.** In some premises, images are captured for the sole purposes indicated in the purposes section of this privacy policy and/or at the request of public authorities.

We have an information circular available upon request and a video-surveillance zone logo located in a sufficiently visible place in front of the camera, informing that the place is a video-monitored establishment.

The images captured by the cameras shall be limited to the public establishment concerned. No images shall be taken from the public highway except for a minimum area of the entrances to the establishment.

The recording system shall be located in a guarded or restricted access location. The images obtained shall be accessible only to the authorised person and shall be kept for a maximum period of one month from their capture.

**N. International transfer of personal information.** In order to be able to provide service, we may sometimes need to transfer your data outside the European Economic Area (EEA). For example:

- In the event that we need to communicate with our delegations outside the EEA;
- To communicate with you or our suppliers when you are outside the EU;
- When there is an international dimension to the products/services we provide you with.

International data transfers are subject to special rules governed by the principles of data protection laws. This means that we may only transfer your data to countries or international organisations outside the EU when:

- The receiving country is considered safe by the competent authority as regards the level of protection it applies to personal data.
- All appropriate measures have been taken to ensure the safeguarding of security and the proper exercise of your legal rights, as well as the possibility to lodge complaints.
- There is an applicable exception under data protection law.

**O. Language.** The language applicable to this Privacy Policy is Spanish. Therefore, if there are any contradictions in any of the versions in other languages, the Spanish version shall prevail.

**P. Changes to this Privacy Policy.** Cooltra reserves the right to modify this policy in order to adapt it to legal or legislative updates.

*Last update of these Privacy Policy: December 31st 2024*