

Data Protection Policy of CELESTIA S.L.U.

1. Who is the Data Controller of your data?

The Data Controller of the data processing referring to the different processes regarding the management of users, clients and potential clients, collaborators and suppliers is **CELESTIA S.L.U.** with registered office in C/ Paseo de Pereda 28, 39004 Santander, Cantabria (Spain) and VAT Number ESB39726690.

For the purposes of our data protection policy, the contact telephone number is +34 942 29 12 12 and the contact email is gdpr@celestia-tech.com

2. What kind of data do we have about you and how have we obtained them?

The categories of personal data that is **CELESTIA S.L.U.**, deals with about its users are:

- Identification personal data
- Postal or electronic email, telephone contact number
- Commercial information
- Economic and transaction data
- In no case do we treat specially protected data.

All the aforementioned data we have obtained or directly from you through the presentation of a commercial offer, contractual proposal, etc. or through your company to provide us with identification data and other information necessary to carry out the purpose of the contractual relationship between the parties. It will be an obligation of yours or your company to provide us with the updated data in case of modification.

3. For what purpose do we process your data?

In **CELESTIA S.L.U.** we deal with the data provided by interested persons in order to manage different activities derived from specific procedures carried out in sales, after sales service, supplier management, quality of services, etc. In this way, we will use your data to carry out some of the following actions:

- Sending the information requested by the contact form on our website or any other means of contact with our company,
- Facilitate both potential customers and our customers, offers of products and services of interest,
- Carry out the administrative, fiscal and accounting management of our clients and / or suppliers,
- Carry out satisfaction surveys, market studies, etc. in order to be able to offer you the most suitable offers and an optimized service quality, etc.

We will not elaborate commercial profiles based on the information provided and consequently we will not make automated decisions about you based on a commercial profile.

4. How long will we keep your data?

The personal data related to individuals linked to potential customers, customers and suppliers that **CELESTIA S.L.U.** collects through the different contact and / or information collection forms will be kept as long as the deletion is not requested by the interested party. The personal data provided by our customers and suppliers will be kept while the commercial relationship between the parties is maintained, respecting in all cases the minimum legal terms of conservation according to the matter.

In any case, **CELESTIA S.L.U.** will keep your personal data for a period of time that is reasonably necessary, taking into account our needs to respond to issues that arise or solve problems, make improvements, activate new services and meet the requirements required by applicable law. This means that we can keep your personal data for a reasonable period of time even after you have stopped using our products or have stopped using this website. After this period, your personal data will be deleted from all systems of **CELESTIA S.L.U.**.

5. What is the legal basis for processing your data?

According to the type of data processing, we summarize in the following the basis of legitimization of said treatment:

Purpose of the processing activity	Legal basic
Accounting Management: billing management with clients and / or suppliers	Maintenance, development and control of the contractual relationship between the parties
Tax management: application of withholdings, bonuses, etc.	Maintenance, development and control of the contractual relationship between the parties; Compliance with legal obligations
Administrative management: logistics management, warehouse, deliveries to the customer, receipt of goods, etc.	Maintenance, development and control of the contractual relationship between the parties
Management of corporate acts: Management of operations in corporate acts, minutes, powers of attorney, etc.	Consent of the affected
Control in access visits to buildings / offices: Registration of people accessing the facilities for access control and security.	Legitimate interest of the responsible
Operations management in alarm systems: alarm system with image capture by motion detection	Legitimate interest of the responsible
Operations in video surveillance for security reasons: Surveillance and control of access to facilities	Legitimate interest of the responsible
Processing rights of data protection stakeholders: Response to the exercise of rights by stakeholders	Consent of the affected
Operations management with contacts - web users: Management of information requests that arrive through web forms or social networks	Consent of the affected
Quality control / monitoring and audits of suppliers: Management of quality processes / monitoring and audits of suppliers	Consent of the affected

Regarding legal basis mentioned above,, you are obliged to provide personal data, in the event that you do not provide your personal data, your contract can not be executed or comply with legal obligations or derived from official authority.

6. What are your rights as affected or interested person?

CELESTIA S.L.U. will never share your personal data with any third parties that intends to use them in their direct marketing actions, except in the case that you have expressly authorized us to do so.

We inform you that we can provide your personal data to Public Administration bodies and competent authorities in those cases that **CELESTIA S.L.U.** receives a legal requirement by said Authorities or in cases that acting in good faith, we consider that such action is reasonably necessary to comply with a court process; to answer any claim or legal claim; or to protect the rights of **CELESTIA S.L.U.** or its customers and the general public.

CELESTIA S.L.U. can provide your personal data to third parties (for example, Internet service providers that help us manage our website or carry out the contracted services, support companies and IT maintenance, logistics companies, agencies and tax and accounting advice, etc.). In any case, these third parties must maintain, at all times, the same levels of security as **CELESTIA S.L.U.** in relation to your personal

data and, when necessary, are bound by legal commitments in order to keep your personal data private and secure, and in order to use only the information following specific instructions from **CELESTIA S.L.U.**

7. What are your rights as affected or interested person?

Anyone has the right to obtain confirmation on whether **CELESTIA S.L.U.** is processing personal data concerning him/her, or not.

In particular, data subjects can request the right of access to their personal data, as well as receive them in a structured, commonly used and machine-readable format (Right to data portability).

Likewise, data subjects may request the right to rectify inaccurate data or, if appropriate, request its deletion when, among other reasons, the data is no longer necessary for the purposes that were collected.

In addition, in certain circumstances, the data subjects may request the limitation of the processing of their data, or in certain circumstances and for reasons related to their particular situation, data subjects may exercise their right to object their personal data. **CELESTIA S.L.U.** will stop processing the data, except for compelling legitimate reasons, or the exercise or defense of possible claims or in those exceptions established in the applicable regulations.

Likewise, we inform you that you have the right to erasure the given consents at any time, without affecting the legality of the processing based on the prior consent to its withdrawal.

Likewise, the User is informed that at any time he / she can exercise the aforementioned rights by writing to us using the contact data that appear in Section 1, 'Data Controller' of the present Personal Data Protection Policy **CELESTIA S.L.U.** attaching a copy of a personal identification document. Likewise, you can send us an email to the following address gdpr@celestia-tech.com.

You will also have the right to bring and action before the Spanish Data Protection Agency, especially when you have not obtained satisfaction in the exercise of your rights.

*Agencia Española de Protección de Datos
C/ Jorge Juan 6
28001 Madrid · España / Spain
Tel: + 34 901 100 099 · +34 91 26 63 517*

8. Protection of personal data in use of the web page's users.

In accordance with the current Regulation (EU) 2016/679, **CELESTIA S.L.U.** informs that the personal data of the users of the website will be treated for the processing activity indicated in each form of data collection from our website on behalf of **CELESTIA S.L.U.**. Said processing of your data will be processed because of your consent. By clicking on the "SEND" button, the User consents to the processing of his/her personal data by **CELESTIA S.L.U.**.

Also, we inform you that except legal obligation or express consent on your part **CELESTIA S.L.U.** will not communicate your data to third parties.

Likewise, the Data Subject is informed that at any time he or she may exercise the rights of access, rectification or erasure of data as well as having other rights recognized in this document and regulated in Regulation (EU) 2016/679, notifying them to **CELESTIA S.L.U.**, C/ Paseo de

Pereda 28, 39004 Santander, Cantabria (Spain) , e-mail: gdpr@celestia-tech.com.

Furthermore, in accordance with the provisions of Law 34/2002, of July 11, Services of the Information Society and Electronic Commerce, **CELESTIA S.L.U.** undertakes not to send advertising through email without having previously obtained the explicit consent of the recipient. The Data Subject may oppose the sending of advertising by checking the corresponding box.

9. Other information of interest about our privacy policy

9.1. Security measures

CELESTIA S.L.U. adopts the security levels required by the European and Spanish regulations in force in data protection taking into account the state of the art, the costs of implementation and the nature, scope, context and purposes of processing, as well as the risks of varying likelihood and severity for rights and freedoms of natural persons posed by the processing.

9.2. Data processing of minors

Under the Regulation (EU) 2016/679 and the RD 1720/2007, minors under 14 can give their consent to the contracting of services of the information society, such as registration in a forum, the completion of a contact form, etc. However, it will be the responsibility of **CELESTIA S.L.U.** to verify the accuracy of the indicated age by the minor.

For the processing of data minors below the age of 14, such processing shall be lawful only if and to the extent that consent is given or authorized by the holder of parental responsibilities over the child.

9.3. Modifications of our Data Protection and Privacy Policy

Occasionally, **CELESTIA S.L.U.** may make changes and corrections in this section of Data Protection Policy for Users, customers and suppliers. Please check this section regularly for changes that may have occurred and how they may affect you.

9.4. Why is it necessary to accept this Data Protection and Privacy Policy?

This section of the Data Protection Policy for Clients, Suppliers and Users of the **CELESTIA S.L.U.** website provides you in an easy accessible way all the necessary information so that you can know the type of personal data that **CELESTIA S.L.U.** maintain on Clients, Suppliers and Users, the purposes pursued, the rights that data protection regulations recognize you as a data subject and how to exercise those rights. Therefore, with the deliberate sending of your personal data through our means of contact and / or with the beginning of the commercial relationship with our company, we consider that you acknowledge and accept the processing of your personal data as described in this policy. This personal information will only be used for the purposes for which you have provided it or certain national or regional regulations enable us to do so.

In any case, we must warn you that a refusal on your part to provide certain requested information could hinder the development of the contractual relationship between the parties with possible serious consequences at the time of providing the various benefits contemplated in the commercial contract with the contracting party.

If you have any questions regarding this section of Personal Data Protection Policy for Clients, Suppliers and Users of **CELESTIA S.L.U.** please contact the company using the address provided in the first section Data Controller' and We will be happy to assist you and answer any additional questions you may want to.

10. Applicable legislation

These conditions shall be governed at all times by the provisions of Spanish and European legislation on the protection of personal data and privacy.