

BATLLEGROUP PRIVACY POLICY

Basic information

BASIC DATA PROTECTION INFORMATION

Data Controller: ENRIC BATLLE GROUP, S.L.

Purpose: Facilitate contact to be able to offer an answer to your questions, doubts or requests for information about the services provided, as well as the processing and sending of newsletters.

Legal basis: Consent of the user for treatment of his/her personal data.

Recipients: No data will be transferred to third parties, except under legal obligation.

Rights: Access, rectify and delete data, as well as other rights, as explained in the additional information.

Additional information: You can find more information about data protection in the additional information.

Additional information

ENRIC BATLLE GROUP, S.L. (hereinafter, "Batllegroup") hereby informs you transparently, through this Privacy Policy, about how we use your data through our official website <http://batllegroup.com/> (hereinafter, "Website"), the purposes for which we treat them and the rights that as a user you can exercise over your personal data, as well as the time during which we will keep your data.

We inform you that when you access our website you will acquire the status of user. As a user, you declare that you have the necessary legal capacity to fully understand and accept the Privacy Policy. This Privacy Policy must be read in conjunction with our Cookies Policy.

Thanks for visiting our website. We hope you enjoy knowing the services that Batllegroup offers you.

1. WHO IS THE DATA CONTROLLER FOR YOUR DATA?

- 01 Identity: ENRIC BATLLE GROUP, S.L. (hereinafter "Batllegroup"), with Tax Identification Number (CIF) B-58.405.689, is the data controller for your personal data that you provide us.
- 01 Postal address: Calle Diputació 302, Local 1, 08009 Barcelona.
- 01 Phone: 93.215.88.25
- 01 E-mail: info@batllegroup.com.

2. WHAT IS PERSONAL DATA AND PERSONAL DATA PROCESSING?

Data that identify or allow identifying a person. For example, the data that can directly identify a person are the name and surname, while a National ID number can be used to identify it. Personal data includes information such as mobile phone, e-mail address, date of birth and sex, among others. Other data could include numeric identifiers such as your computer's IP address, as well as the information obtained through cookies.

Personal data processing is any operation or set of operations that we perform on your personal data, such as, for example, collection, registration, conservation, use and communication of your data.

3. WHAT TYPE OF INFORMATION DO WE COLLECT?

Batllegroup will be able to collect personal data that you provide us through the telephone and contact e-mail available on our website.

Likewise, to subscribe to our newsletter in order to receive news and other communications related to our sector, we will need to obtain your e-mail address.

Obtaining the aforementioned personal data is necessary for correctly providing and executing our services.

4. THROUGH WHAT MEANS DO WE COLLECT YOUR PERSONAL DATA?

At Batllegroup we only collect and treat information that you provide us through the following channels:

1. By sending emails to our contact email address info@batllegroup.com.
2. Through telephone calls to our telephones 932158825 (Barcelona), 606393310 (Madrid) and +86 (0) 2034215013 (China).
3. By subscribing to our newsletter in order to keep you informed about news related to the services offered by Batllegroup.

5. HOW DO WE PROCESS YOUR PERSONAL DATA AND FOR WHAT PURPOSES?

We want to be transparent with you and inform you about the operations we carry out with your data and the purposes for which we process said data.

All the processes involving your personal data are outlined below:

5.1 Processing and sending of sales communications

Batllegroup will send users, whenever consent has been granted, commercial communications by e-mail informing them about news related to the services offered by Batllegroup.

We inform you that at any time you can object to receiving commercial communications by following the instructions in the footer of the e-mail sent by Batllegroup or by sending an e-mail to info@batllegroup.com.

5.2 Contact and customer service

Batllegroup will provide customer service, addressing any request for information or inquiry sent through the e-mail address or customer service telephone number available on the website.

5.3 Having blacklists of users that have requested not to be contacted

Batllegroup will store the confirmation of users who have requested their data to be deleted in a deletion list when users have opted out of receiving our commercial communications or have requested the deletion of their data.

6. 1 WHAT IS THE LEGAL BASIS FOR PROCESSING YOUR DATA?

Data protection regulations require us to have a legal basis to substantiate the processing of your data. Thus, to process your personal information we rely on two legal bases depending on the activity or processing in question. The legal bases for the treatment of your personal data are as follows:

- Your consent: By completing the form to subscribe to our newsletter, as well as by contacting the telephone number or e-mail address provided on our customer service website when making any inquiry or request for information, accepting our privacy policy, you consent to the processing of your data by Batllegroup. This consent is required to successfully sign up to our newsletter and ensure that your queries and requests are addressed.
- Compliance with a legal obligation: Batllegroup will file the confirmation of users who have requested the deletion of their data in a deletion list, in compliance with the legal obligation stemming from Regulation (EU) 2016/679 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL, dated April 27, 2016, concerning the protection of natural persons with regard to the processing of personal data and the free movement of such data, repealing Directive 95/46/EC.

7. FOR HOW LONG DO WE KEEP YOUR DATA?

We will keep your data while you do not request to unsubscribe from our newsletter, and in any case during the periods stipulated by the applicable regulations regarding the prescription of responsibilities.

Data captured on during information requests or inquiries shall be kept the time required for service provision.

8. WHAT ARE YOUR RIGHTS WHEN YOU SHARE YOUR DATA?

Your rights as a website user are as follows:

Right of access

You are entitled for Batllegroup to confirm whether or not it is processing your personal data, and in such case, the right to know what data it processes.

▪ Right of rectification

It consists of the possibility that you can modify data that is inaccurate or incomplete. You must indicate on the rectification request what data you want to modify.

▪ Right of opposition

You can object to our processing of your data at any time. You have the right to object at any time, for reasons related to your particular situation, to the fact that personal data concerning you are processed by the company for its legitimate interest. Batllegroup will stop processing personal data unless we determine the existence of compelling legitimate grounds for treatment which prevail over your interests, rights and freedoms, or for the formulation, exercise or defence of claims.

▪ Right of suppression

This right ensures the cancellation of your personal data. The data will be blocked so as to prevent processing, without prejudice to the possibility of making them available to public administrations, judges and courts, to address potential liabilities that may have arisen from processing during the limitation period.

▪ Right to data portability

You have the right to copy and transfer data from our database to another data controller. You can only exercise this right when processing is based on the performance of a contract or consent and treatment is performed by automated means.

▪ The right to processing limitation

This right allows you to ask us to suspend data processing when:

- You challenge the accuracy of the data, while Batllegroup verifies such accuracy.
- You have exercised your right to oppose the processing of your data, while the team checks whether the legitimate reasons for Batllegroup take precedence over yours as the interested party. Likewise, this right allows you to ask Batllegroup to safeguard your personal data when:
 - Data processing is unlawful and as the interested party you oppose the deletion of your data and request instead limiting their use.
 - Batllegroup no longer needs your personal data for the purposes of processing, but does need them for the formulation, exercise or defence of claims.

▪ How can you exercise these rights?

- You may exercise your right by sending the request by e-mail at info@batllegroup.com or by post in writing and signed, accompanied a photocopy of your identity card or passport, sent to the following address: Calle Diputació 302, Local 1, 08009 Barcelona.– Ref. Data protection.

We also hereby inform you that when Batllegroup has not properly exercised your rights, you may file a complaint with the Spanish Agency for Data Protection (AEPD). If you wish to obtain more information about how to exercise this right you may address the AEPD:

<http://www.agpd.es>

Tel. 901 100 099 and 91.266.35.17

C/Jorge Juan,6 28001-Madrid

9. TO WHOM DO WE COMMUNICATE YOUR PERSONAL INFORMATION?

Batllegroup does not disclose personal information you provide us via the channels described in section four, unless it is necessary for the service.

Likewise, we may disclose your personal data if we receive a legal requirement that legitimizes disclosure to courts or public administration bodies.

10. CHANGES TO THIS PRIVACY POLICY

This Privacy Policy may change over time due to possible changes in criteria followed by the competent supervisory authority on data protection at any given moment. Batllegroup therefore reserves the right to amend this Privacy Policy to adapt it to these criteria, as well as jurisprudential or legislative developments.

Last version: October 25, 2018.