

## **Privacy Policy of FINDMYSafe**

FINDMYSafe takes the protection of your privacy and personal data very seriously. Therefore, your personal information is stored securely and handled with the utmost care.

This Privacy Policy governs access to and use of the service (hereinafter, the "Service") that FINDMYSafe makes available to users interested in the services and content hosted on the Website. The website installs cookies that collect information about browsing activity; we recommend that you read the cookie policy for complete information in this regard.

### **1. Who is responsible for processing your data?**

The controller of your personal data is ALTO DE LOS GODOS S.L. (hereinafter, "FINDMYSafe"), with Tax ID No. B21756663, and registered office at Carretera de Rubí 88, Sant Cugat del Vallès 08174, Barcelona.

We inform you that ownership of the domain of our website [www.findmysafe.com](http://www.findmysafe.com) (hereinafter, the "Website") belongs to FINDMYSafe.

Access to and/or use of the Website confers the status of User (hereinafter, the "User"), and implies acceptance of the data processing described in this Privacy Policy.

### **2. What are the purposes of processing your personal data by FINDMYSafe?**

Your personal data collected by FINDMYSafe may be used for the following purposes:

- (i) Data management to formalize the purchase of products and their delivery as offered on the Website.
- (ii) Sending commercial communications from FINDMYSafe about its services by letter, telephone, email, SMS/MMS, push notifications, or other equivalent electronic means, provided that the User has consented to the processing of their personal data for this purpose.
- (iii) Assisting, managing, and handling any requests, comments, inquiries, complaints, or claims submitted by you.
- (iv) Creating and managing user accounts.
- (v) The information will be processed in order to comply with our legal and regulatory obligations, as well as to comply with possible court rulings and other decisions issued by the authorities. This includes the disclosure of your personal data to law enforcement agencies, whenever we have suspicions or indications of conduct that may constitute an unlawful act or criminal offense.

- (vi) Sending surveys and questionnaires, as well as sending invitations to participate in review management platforms or online opinion communities, in order to understand your level of satisfaction, analyze it, and improve the quality of our products and services and customer service;
- (vii) Analyzing information about our interaction with you in order to improve our engagement and/or carry out studies and statistics to enhance the platform, our functionality as a company, our products and/or services, as well as our relationship with and experience of customers.

### **3. Why is FINDMYSafe entitled to carry out data processing?**

The data processing activities carried out by FINDMYSafe are based on the following legal grounds:

- i) When the information you provide is processed in order to formalize a purchase, the processing is carried out on the basis of the performance of a contract to which the data subject is a party or in order to take steps at the request of the data subject prior to entering into a contract (Article 6.1(b) GDPR);
- ii) When your data is processed to send you commercial information, the processing is carried out on the basis of your consent (Article 21.1 of Law 34/2002, of 11 July, on information society services and electronic commerce – LSSICE –) and/or the legal authorization provided for in Article 21.2 of the LSSICE. The sending of communications may also be based on legitimate interest (Article 6.1(f) GDPR) and the express consent given by the user (Article 6.1(a) GDPR). We remind you that the sending of such commercial communications may be withdrawn at any time in each of the communications received through the mechanism provided for this purpose;
- iii) When your data is processed to assist, manage, and handle possible requests, comments, and/or inquiries, the processing is carried out on the basis of your consent when you submit your inquiry and/or request to us (Article 6.1(a) GDPR);
- iv) When data is processed to create and manage user accounts, the legal basis will be the consent given by the user when requesting registration (Article 6.1(a) GDPR);
- v) When the information is processed in order to comply with our legal obligations, possible court rulings, and other decisions issued by the authorities, the processing is carried out on the basis of compliance with our legal obligations (Article 6.1(c) GDPR);
- vi) When your information is processed for the purpose of analyzing it in order to determine the level of satisfaction of our users, improve our engagement, and/or carry out studies and statistics to improve the quality of our functionality as a company and our products and/or services, the processing is carried out for the satisfaction of our legitimate interest, which consists of managing and improving our products and services (Article 6.1(f) GDPR), always taking into account that our interest does not prevail over your interests, rights, and fundamental freedoms.

## **4. Accuracy of the data provided by Users**

The User guarantees that the personal data provided is accurate and is responsible for notifying FINDMYSafe of any changes thereto. In any case, the User shall be responsible for the accuracy of the data provided, and FINDMYSafe reserves the right to exclude from the registered Services any User who has provided false data, without prejudice to any other actions that may be taken in accordance with the law.

## **5. Recipients**

Depending on the purposes for which the personal data has been collected, the following third parties may have access to it:

- (i) Public administrations, bodies and/or competent authorities, and the relevant law enforcement agencies, in cases where there is a request, a legal obligation, or where we consider that there are sufficient indications and/or suspicions of an unlawful act or criminal offense.

## **6. International transfers**

FINDMYSafe, through its partners and third-party service providers, transfers personal data to countries outside the European Economic Area (EEA). Any international data transfers that may be carried out are subject to adequate protection of personal data through the use, in all cases, of appropriate safeguards, in particular the use of standard contractual clauses approved by the European Commission.

## **7. Conservación de los datos**

The personal data provided will be processed for the period necessary to fulfill the purposes set out in this Privacy Policy, as well as to retain your personal information in compliance with applicable laws and regulations, especially with regard to statutory limitation periods, and for the establishment, exercise, or defense of legal claims. The criterion we follow for this purpose is determined by the purpose of the data

collected and the fulfillment of said purpose (e.g., in the case of consent, you may withdraw it at any time), as well as the mandatory retention periods in accordance with contractual and requirements.

## **8. User rights in relation to their data**

The User has the right to (i) access their personal data, as well as to (ii) request the rectification of inaccurate data or, where applicable, request (iii) its erasure, (iv) request the restriction of the processing of their data, (v) object to the processing of their data, and (vi) request data portability. In addition, the User may exercise (vii) their right to be forgotten. If you have given us your consent, you may withdraw it whenever you wish, without affecting the lawfulness of processing based on consent carried out prior to withdrawal. The User may exercise all these rights by emailing [support@findmysafe.com](mailto:support@findmysafe.com), indicating the reason for the request, or by regular mail to the data controller's address. Without prejudice to any other administrative remedy or judicial action, the User shall have the right to lodge a complaint with a Supervisory Authority, in the event that they consider that the processing of their personal data is not in accordance with the regulations, as well as in the event that they are not satisfied with the exercise of their rights. The Supervisory Authority with which the complaint has been lodged shall inform the complainant of the progress and outcome of the complaint.

## **9. Data security**

The protection of Users' privacy and personal data is very important to FINDMYSafe. Therefore, FINDMYSafe has implemented appropriate technical and organizational measures to prevent data from being used improperly, allowing access to it only to authorized personnel.

FINDMYSafe maintains levels of security for the protection of personal data in accordance with applicable regulations and has established appropriate technical measures to prevent the loss, misuse, alteration, unauthorized access, and theft of the data provided by the User during the relationship. FINDMYSafe undertakes to comply with the duty of secrecy and confidentiality regarding personal data in accordance with applicable legislation. For those services on the website that require registration as a User, a password must be chosen. The User is responsible for maintaining the confidentiality of this password, as well as for all activities that occur in the session initiated with their username and password. The User undertakes to notify FINDMYSafe as soon as possible of any unauthorized use of their username and/or password or any other security breach. FINDMYSafe shall not be liable for any damages or losses that may arise due to the User's failure to comply with this obligation.

## **10. Questions**

If you have any questions about this Privacy Policy or the processing of your data, please contact FINDMYSafe by email [support@findmysafe.com](mailto:support@findmysafe.com)

## **11. Changes**

FINDMYSafe reserves the right to review its Privacy Policy at any time it deems appropriate. For this reason, we ask that you regularly review this Privacy Policy in order to read its most recent version. Nevertheless, any changes made to this Privacy Policy will be communicated to the User.

Text updated on October 29, 2025.