

## PRIVACY POLICY

### 1.- IDENTIFICATION

- **Company name:** Frenetic Electronics, S.L. and its subsidiaries (hereinafter, "**Frenetic**")
- **Tax Identification Number:** B87193637
- **Registered Office:** Avenida de Cordoba 15, 4ºA1 E-28026 Madrid (Spain)
- **Public Registry:** Registered in the Commercial Registry of Madrid, volume 33139, folio 131, section 8, sheet M 596380.
- **Telephone Number:** +34 91 529 6007
- **E-mail:** [privacy@frenetic.ai](mailto:privacy@frenetic.ai)

### 2.- INFORMATION

By accepting this Privacy Policy, the user (hereinafter, the "**User**" or, when appropriate, the "Users") is informed that the personal data processed through website hosted in the URL [www.frenetic.ai](http://www.frenetic.ai) (hereinafter, the "**Website**"), deriving from the browsing activities of the User and those personal data that he or she provides through the Website or through the online platform (hereinafter, the "**Platform**") available in the Website, will be processed by FRENETIC.

The User must carefully read this Privacy Policy, written plainly and in a simple way in order to enable a better understanding of data processing so that User may freely and voluntarily determine whether he or she wishes to provide with his or her personal data to FRENETIC.

### 3.- MANDATORY DATA

Data in the forms are necessary to fulfil the purpose of the processing, unless otherwise indicated in the corresponding field of the form.

Therefore, in case these data are not provided or are provided incorrectly, FRENETIC will not be able to perform the requested service. Despite this, the User may still be able to freely view some of the content of the Website.

### 4.- FOR WHAT PURPOSE WILL FRENETIC PROCESS THE PERSONAL DATA OF THE USER?

The personal data provided by the User through the Website and through the Platform will be processed by FRENETIC for the following purposes:

- a) Managing the contractual relation with the User for the provision of the services rendered by FRENETIC:
  - Manage the sign up and registration of the User in the Platform.
  - Contact the User to remind him or her to finish the registration process, and/or to help him or her finish this process.

- Prevention and control of the use of the Platform with illegal or unauthorized purposes, whether with economic purposes or not.
  - Analyze, manage and process incidents related to the provision of the services provided by FRENETIC to the User.
  - Sending of transactional communications related to the account of the User in the Platform or its availability.
- b) Answering the inquiries made by the Users through the channels provided for this purpose: Manage, process and answer the petitions, requests, incidents, claims and inquiries made by the User through the channels provided for this purpose.
- c) Sending of commercial communications: Sending of commercial communications to the User, regarding products and services of FRENETIC, by electronic and conventional means, as long as the User does not express his or her objection to receive them.
- d) Profiling: Profiling the User, using both FRENETIC own sources and third-party sources, in order to offer products and services to the User in accordance to our classification, when the User consents checking the corresponding checkbox.

## 5.- WHAT SPECIFIC PERSONAL DATA DOES FRENETIC PROCESS?

The following personal data of the User may be processed:

- **Identifying data: name, surname.**
- **Contact details:** email address, telephone number, postal address and billing address.
- **Professional data:** company name.
- **Data regarding the User's navigation in the Website.**

In the event that a User submits data belonging to third parties, he or she declares to have obtained from such third parties the appropriate consent and undertakes to provide the information contained herein to those third parties, exempting FRENETIC from any liability in this regard.

Notwithstanding the foregoing, FRENETIC may carry out the necessary verifications to confirm this situation in accordance with the applicable regulations.

## 6.- WHAT IS THE LEGAL BASIS FOR THE PROCESSING OF THE USER'S DATA BY FRENETIC?

The processing of the User's data by FRENETIC is based on in Article 6 of Regulation (EU) 2016/679 (General Data Protection Regulation) and in the Organic Law 3/2018 of 5 December on the Protection of Personal Data and Guarantee of Digital Rights, regarding the performance of the contract for the provision of a service to which the User is party, as well as, depending on the case, the legitimate interest pursued by FRENETIC and the consent obtained from the User, who might withdraw it at any time. In particular, FRENETIC processes the data based on the following legal basis:

- a) Managing the contractual relation with the User for the provision of the services rendered by FRENETIC: The processing of data with this purpose is based on the **fulfilment of the contractual relation**.

- b) Answering the inquiries made by the Users through the channels provided for this purpose:  
The processing of data with this purpose is based on the **consent** of the User, who may withdraw it at any time. In the event that the User withdraws his or her consent, FRENETIC would not be able to process the enquiry made.
- c) Sending of commercial communications: The processing of data with this purpose is based on the **legitimate interest**, which is granted to the data controller by the applicable regulations. This legitimate interest is based on the consideration of the User's interest, as clients of FRENETIC, to be informed of their services by direct marketing means, as long as the User had not previously expressed their objection to receive them.
- d) Profiling: The processing of data with this purpose is based on the User's **consent**, that he or she gives at the time of the registration, and which may be withdrawn at any time.

## 7.- WITH WHICH RECIPIENTS WILL THE USER'S DATA BE SHARED?

All the data provided by the User through the Platform may be shared with:

- a) Public Administrations, to the extent necessary to comply with applicable law.
- b) Courts, to the extent necessary to comply with applicable law.
- c) Banks and financial entities, for the fulfilment of the contractual relation.

The recipients indicated in this section may be located within or outside the European Economic Area, in the latter case being duly legitimized international data transfers.

## 8.- RIGHTS OF THE DATA SUBJECT

The User may send a letter to the address **Avda. de Córdoba 15, 4º A1, E-28026 Madrid (Spain)** or by e-mail to [privacy@frenetic.ai](mailto:privacy@frenetic.ai) with the Reference "**Data Protection**", at any time and free of charge, to exercise the following rights, which are recognized to the User as a data subject in accordance with the GDPR:

- a) Right of access:  
The User has the right to obtain from FRENETIC confirmation as to whether or not personal data concerning him or her are being processed, and, where that is the case, access to the personal data and information on the purposes of the processing, the categories of personal data concerned, the recipients to whom the personal data is disclosed, and the envisaged period for which the personal data will be stored, among other information.
- b) Right to rectification and erasure:  
The User has the right to obtain from FRENETIC the erasure of personal data concerning him or her where one of the legal grounds applies, among other reasons when the data is no longer necessary for the purposes for which it was gathered. The User also has the right to obtain the rectification of inaccurate personal data concerning him or her.

- c) Right to restriction of processing, right to withdraw consent and right to object, totally or partially, to processing:

The User may, under certain circumstances (for example, in the event that the User refutes the inaccuracy of his or her data for as long as the accuracy is verified), ask for the restriction of the processing of his or her personal data, which will then only be processed for the establishment, exercise or defense of legal claims.

The User also has the right to withdraw the consent granted, and to object, on grounds relating to his or her particular situation, at any time to processing of personal data concerning him or her which is based on the legitimate interest of FRENETIC. In this case, FRENETIC will no longer process the personal data unless it demonstrates compelling legitimate grounds for the processing.

- d) Right to data portability:

The User has the right to receive the personal data concerning him or her, which he or she has provided to a controller, in a structured, commonly used machine-readable format and have the right to transmit those data to another controller without hindrance from FRENETIC, in the cases foreseen in the regulations to this effect.

- e) Automated individual decision-making:

In addition to the aforementioned rights, when decisions are made based solely on automated processing, including profiling, the User has the right to obtain human intervention on the part of FRENETIC, to express his or her point of view and to contest the decision.

- f) Other:

When personal data are transferred to a third country or to an international organization, the User has the right to be informed of how he or she may access or obtain a copy of the appropriate safeguards relating to the transfer.

The User may lodge a complaint in relation to the processing with the supervisory authority, when he or she considers that his or her rights set forth in the applicable regulations have been violated.

## 9.- DATA STORAGE

The data provided by the User will be stored on the Platform's databases for the following periods:

Data provided for the managing of the contractual relation with the User for the provision of the services rendered by FRENETIC: the data provided for the managing, processing, and following of the services contracted will be stored as long as the contractual relation is in force, and once it has ended, for the period of prescription of the legal actions that may derive from it.

Data used to answer the inquiries made through the contact channels provided: the data will be stored for the period of time necessary to process and answer the inquiry, and after for the period of prescription of the legal actions deriving from said inquiry.

Data used for the sending of commercial communications: the data will be processed for that purpose until the User objects to such processing or withdraws his or her consent.

Data used with the purpose of profiling, obtained from third-parties: the data used for this purpose will not be stored for a period of time longer than one year.

## 10.- COMMERCIAL AND PROMOTIONAL COMMUNICATIONS

One of the purposes for which FRENETIC processes the personal data provided by Users is to send them electronic communications with information regarding products, activities, services, and promotions about the services provided in the localities in which FRENETIC services are offered. Electronic communications of this type will be sent to the Users as long as they have not previously expressed their refusal to receive them.

Should the User wish to stop receiving commercial or promotional communications from FRENETIC, he or she may request cancellation of the service by sending an email to the following email address: [privacy@frenetic.ai](mailto:privacy@frenetic.ai), or indicating it by means of the unsubscribe option provided in each of the commercial communications that are sent.

## 11.- LIABILITY OF THE USER

The User guarantees that he or she is over eighteen (18) years old and that the data he or she provides to FRENETIC is real, accurate, complete and updated. To this effect, the User is responsible for the veracity of the data that he or she provides, and will keep it updated so that it reflects his or her current state.

The User guarantees that, when he or she provides personal data concerning third-parties, the User has informed them of the content of this Privacy Policy. Moreover, the User undertakes to have obtained the consent of the data subject to give his or her data to FRENETIC for the aforementioned purposes.

The User is responsible for the inaccurate, false or out-of-date information that he or she provides through the Platform, and for the damages, both direct and indirect, that this may cause to third-parties.

## 12.- SECURITY MEASURES

FRENETIC will process at all times the personal data of the User in a confidential manner and keeping the duty of secrecy with regard to said data, in compliance with the applicable regulations. Taking into account the nature, scope, context and purposes of processing as well as the risks, FRENETIC has implemented appropriate technical and organizational measures to ensure the safety of the data and to avoid its alteration, loss, unauthorized access or processing.

### 13.- MODIFICATIONS

FRENETIC reserves the right to revise this Privacy Policy when it deems appropriate, in which case it will be communicated to the Users. For this reason, please check this Privacy Policy regularly to read the most recent version.

### 14.- ACCEPTANCE AND CONSENT

The User declares to have been informed of the conditions on data protection, accepting the content of this Privacy Policy.

### 15. CONTROL AUTHORITY

Frenetic Electronics, S.L. (informs the Users that they have the right to file a claim with the Spanish Agency for Data Protection — Agencia Española de Protección de Datos, AEPD —, located at C/Jorge Juan 6, E-28001 Madrid (Spain), when they have not obtained a satisfactory response in the exercise of Their rights.

More information about the AEPD in <http://www.aepd.es/>.