

CONSULTING SERVICES

Privacy policy

1. General information

Data protection is important to us and we process your data exclusively in accordance with the statutory provisions. In this data protection declaration, we explain how we collect and process personal data. Personal data is understood to be all information that relates to an identified or identifiable person.

This privacy policy is based on the Data Protection Act (DPA) and the European General Data Protection Regulation (GDPR). The General Data Protection Regulation (GDPR) applies not only in the European Economic Area (EEA), including the European Union (EU), but also to companies and other data controllers in Switzerland and other - from the EU's perspective - so-called third countries.

Changes

We are obliged to adapt the data protection declaration in the event of changes to the law and are therefore entitled to adapt this data protection declaration at any time without prior notice. The current version published on our website applies.

Responsible

Responsible for the information provided in this privacy policy and the data processing shown is: Gastro Cosmos S.L. For data protection concerns and information, you can contact us by email at <u>info@gastrocosmos.es</u> or by post at the following address

Gastro Cosmos S.L.

C. Hibisco 1 - C. C. El Campanario - 35660 Corralejo, Las Palmas

Data security

We take data security extremely seriously and use appropriate technical and organizational security measures to protect your personal data against accidental or intentional manipulation,

loss, destruction or against unauthorized access by third parties. We continuously improve our security measures in line with technological developments. Within our website, we use the SSL (Secure Socket Layer) procedure in conjunction with the highest encryption level supported by your browser. You can tell whether an individual page of our website is transmitted in encrypted form by the closed padlock symbol in the status bar of your browser.

2. General principles

Processing of personal data

First and foremost, we process personal data that we collect when you visit our website or further applications or that we collect from our customers and other business partners in the course of our business relationship with them and other persons involved. We primarily collect personal data directly from you. We may also receive personal data about you from third parties (see below).

These data may include the following categories:

- · Information from publicly accessible sources (e.g. media, internet)
- · Information from public registers (e.g. commercial register, debt collection register, land register)
- · Information in connection with official or judicial proceedings
- · Information concerning your professional functions and activities
- · Information about you in correspondence and meetings with third parties
- · Creditworthiness information (insofar as we conduct personal business with you)

• Information about you that people close to you give us so that we can conclude or process contracts with you (e.g. references, your address for deliveries, powers of attorney, information on compliance with legal requirements, information from banks, insurance companies, sales and other contractual partners).

• Information from the media and internet about your person (insofar as this is necessary in the specific case, e.g. in the context of an application, press review, marketing, sales, etc.).

 \cdot Data related to the use of the website (e.g. IP address, MAC address of the smartphone or computer, details of your device and settings, cookies, date and time of visit, pages and content accessed, functions used, referring websites, location details).

Purposes and legal bases of data processing

We process your data only for specified, transparent and business purposes and only in cases permitted by law. You will find below the individual data processing operations on our website, with the purposes and legal bases for data processing.

The following grounds can be considered as a legal basis:

Your consent: If you have given us consent to process your personal data for certain purposes, we will process your data within the scope of this consent unless we have another legal basis. You can revoke your consent at any time. Data processing that has already taken place is not affected by this.

- · The performance of a contract or pre-contractual measures;
- · The fulfilment of legal requirements;
- · Our legitimate interests, unless your interests or fundamental rights are overridden;
- · To safeguard vital interests of you or another person or to perform a task in the public interest;
- · Other relevant legal bases.

Data sharing

As a general rule, in the course of providing our services and our website, we may need to use the services of third parties. In this context, it may happen that we commission third parties to process your personal data. In this case, we contractually ensure that these third parties comply with the requirements of data protection. We may also be obliged to disclose your data to authorities or other third parties.

The following applies abroad: Under certain circumstances, your personal data may also be transferred to companies abroad within the scope of commissioned processing. These companies are obligated to the same extent with regard to data protection. If the level of data protection in the country to which data is transferred does not correspond to that in Switzerland or the European Union, we contractually ensure that the same level of protection is guaranteed as in Switzerland or the European Union. This can be done through standard data protection clauses of the European Commission or a supervisory authority or approved and authorized codes of conduct together with binding and enforceable obligations of the recipient or approved certification mechanisms together with binding and enforceable obligations of the recipient.

We will only share your personal data if one of the following 6 conditions is met:

1. your consent has been given;

2. there is a legal obligation;

3. if this is necessary to enforce our rights, in particular the enforcement of claims arising from the contractual relationship;

4. if this is necessary for the performance of the contract or the implementation of precontractual measures;

5. if we have a legitimate interest in doing so and your interests to the contrary do not outweigh ours;

6. if another legal permission exists.

Retention period

We only store personal data for as long as is necessary to fulfil the individual purposes for which the data was collected. We store contractual data for longer, as we are obliged to do so by legal regulations. Such retention obligations result from regulations on registration law, on accounting and from tax law. According to these regulations, business communication, concluded contracts and accounting vouchers must be stored for up to 10 years. As long as we no longer need such data from you for the performance of the services, the data will be blocked. In this case, we will only use the data for accounting and tax purposes.

Profiling

In some cases, your personal data is processed automatically in order to relate certain personal aspects and thus to be able to better evaluate behavior. Profiling is used by us in particular to be able to inform and advise you in a targeted manner about certain services or products of ours. For this purpose, we use evaluation tools thanks to which we can communicate in a needs-based manner and take appropriate advertising measures, including market and opinion research.

Information & Rights

Within the scope of the data protection law applicable to you and insofar as provided for therein (such as in the case of the DSGVO), you have the right to receive information from us about which personal data is stored about you. In addition, you can request the correction of incorrect data or the deletion of personal data, provided that this does not conflict with any legal obligations to retain data or a legal authorization that permits processing. Furthermore, you may, under certain circumstances, have the processing of your personal data restricted or object to it. You also have the right to demand that we return the data you have given us (right to data portability). You have the right to receive the data in a common file format. We have already informed you about the possibility of revoking your consent above and in the corresponding data processing procedures.

Please note that the exercise of your rights may be subject to legal restrictions. We reserve the right to assert these, e.g. if we are obliged to retain or process certain data, have an overriding interest in doing so (insofar as we are entitled to rely on this) or require them for the assertion of claims. Please note that the exercise of your rights may, under certain circumstances, conflict with contractual agreements and may have corresponding effects on the performance of the contract (e.g. premature termination of the contract or cost consequences). Where this is not already contractually regulated, we will inform you in advance.

The exercise of your rights requires that you prove your identity (e.g. by means of a copy of your identity card if your identity cannot be established in any other way). If you incur costs, we will inform you in advance. If you are affected by the processing of personal data, you have the right to enforce your rights in court or to file a complaint with the competent supervisory authority.

You can find the competent supervisory authority of the respective EU country here: <u>https://edpb.europa.eu/about-edpb/about-edpb/members_en</u>

3. Individual data processing operations on our website

Provision of the website and creation of log files

When you access our website, the provider of the pages automatically collects and stores information in so-called server log files, which your browser transmits to us. These are: Server name IP address Operating system Device type Browser name and version Date and time of the server request

This data cannot be assigned to a specific person and it is not merged with other data sources. The log files are stored in order to guarantee the functionality of the website and to ensure the security of our information technology systems. This is our legitimate interest, which serves as the legal basis.

The data is only stored for as long as is necessary to achieve the purpose for which it was collected. Accordingly, the data is deleted after the end of each session. The storage of the log files is absolutely necessary for the operation of the website, you therefore have no possibility to object to this.

Use of cookies

Our website uses cookies. Cookies are text files that are stored on the operating system of your device with the help of the browser when you access our website. Cookies do not cause any damage to your computer and do not contain viruses. Most of the cookies we use are so-called "session cookies". They are automatically deleted at the end of your visit. Other cookies remain stored on your end device until you delete them. These cookies enable us to recognise your browser on your next visit. This allows us to save certain settings (such as language settings or location information) so that you do not have to re-enter them when you return to the website. We use cookies to make our website more user-friendly, effective and secure. The use of cookies and the related processing of your data is based on the legal basis of our legitimate interests in the aforementioned purposes.

Right of objection (cookies)

The cookies are stored on your computer. You therefore have full control over the use of the cookies. You can delete them completely or deactivate or restrict their transmission by changing the settings in your browser. If you deactivate cookies for our website, it may no longer be possible to use all the functions of the website to their full extent.

Use of our contact form

On our website, you can contact us via an electronic contact form. The data you enter in the input mask, such as name, e-mail address, etc., will be transmitted to us and stored. The data you transmit is used by us to process your enquiry. The legal basis for this is pre-contractual measures as well as our legitimate interests in dealing with the enquiry. We only store your data for as long as is necessary to deal with your enquiry or for as long as we are obliged to do so by law.

Google Web Fonts

We use so-called web fonts on our website for the uniform display of fonts, which are provided by Google (Google Inc., 1600 Amphitheatre Parkway Mountain View, CA 94043, USA). When you call up one of our pages, your browser loads the required web fonts into its browser cache in order to display texts and fonts correctly. For this purpose, the browser you are using establishes a connection to Google's servers. This enables Google to know that our website has been accessed via your IP address. Google Web Fonts are used in the interest of a uniform and appealing presentation of our online offers. This is our legitimate interest, which serves as the legal basis for the data processing. If your browser does not support web fonts, a standard font will be used by your computer. Further information on Google Web Fonts can be found at https://developers.google.com/fonts/faq and in Google's privacy policy: https://www.google.com/policies/privacy/.

Use of Google Analytics

Our website uses Google Analytics, a service provided by Google Inc, 1600 Amphitheatre Parkway Mountain View, CA 94043, USA. Google uses cookies, which are stored on your device and enable an analysis of the website by you. The information generated by the cookie about your use of the website, such as browser type, operating system used, referrer URL (the page previously visited), IP address and time of server request will be transmitted to and stored by Google on servers in the United States. The IP address transmitted by your browser in this context will not be merged with other Google data. We have also added the code "anonymizeIP" to Google Analytics on this website. This ensures that all data is collected anonymously. Only in exceptional cases will the full IP address be transferred to a Google server in the USA and shortened there. Google may transfer this information to third parties where required to do so by law, or where such third parties process the information on Google's behalf. In the case of Google Analytics, Google uses the data on our behalf to evaluate your use of the website, to compile reports on website activities and to provide us with other services related to website and internet use. Google Analytics is used on the legal basis of our legitimate interests in analyzing customer behavior on our website, which enables us to improve our services.

Right of objection (Google Analytics)

You can prevent the storage of cookies by adjusting the settings in your browser accordingly. However, we would like to point out that in this case you may not be able to use all the functions of this website to their full extent. You can also deactivate Google Analytics by downloading and installing the browser add-on at <u>http://tools.google.com/dlpage/gaoptout?hl=de</u>. You can find more information on the handling of user data by Google Analytics in Google's privacy policy at https://support.google.com/analytics/answer/6004245?hl=de.

We use Google Analytics with the functions of Universal Analytics on our website. This allows us to analyze the activities of our website across devices (e.g. when access is made via laptops and later with a smartphone). This is made possible by a pseudonymous assignment of a user ID to a user. This happens, for example, when you register for a customer account or log in to your customer account. No personal data is forwarded to Google. The additional functions of Universal Analytics do not restrict the aforementioned data protection measures such as anonymizing the IP address or the possibility of objecting to the use of Google Analytics. The data collected as part of Google Analytics is stored for as long as is necessary for the analysis of the website. After a period of 50 months at the latest, the data is automatically deleted.

Use of Facebook social plugins

Our website uses so-called social plugins ("plugins") of the social network Facebook, which is operated by Facebook Inc., 1601 S. California Ave, Palo Alto, CA 94304, USA ("Facebook"). The plugins are marked with a Facebook logo or the addition "Social Plug-in from Facebook" or "Facebook Social Plugin". You can find an overview of the Facebook plug-ins and their appearance here: https://developers.facebook.com/docs/plugins.

When you call up a page of our website that contains such a plug-in, your browser establishes a direct connection to the Facebook servers. The content of the plugin is transmitted by Facebook directly to your browser and integrated into the page. Through this integration, Facebook receives the information that your browser has called up the corresponding page of our website, even if you do not have a Facebook profile or are not currently logged in to Facebook. This information (including your IP address) is transmitted by your browser directly to a Facebook server in the USA and stored there.

If you are logged in to Facebook, Facebook can directly assign your visit to our website to your Facebook profile. If you interact with the plugins, for example by clicking the "Like" button or posting a comment, this information is also transmitted directly to a Facebook server and stored there. The information is also published on your Facebook profile and displayed to your Facebook friends.

The purpose and scope of the data collection and the further processing and use of the data by Facebook, as well as your rights in this regard and setting options for protecting your privacy, can be found in Facebook's privacy policy: <u>http://www.facebook.com/policy.php</u>.

Use of Instagram social plugins

Our website uses so-called social plugins ("plugins") from Instagram, which is operated by Instagram LLC., 1601 Willow Road, Menlo Park, CA 94025, USA ("Instagram"). The plugins are marked with an Instagram logo, for example in the form of an "Instagram camera". You can find an overview of the Instagram plugins and their appearance here: http://blog.instagram.com/post/36222022872/introducing-instagram-badges

When you call up a page of our website that contains such a plugin, your browser establishes a direct connection to the servers of Instagram. The content of the plugin is transmitted by Instagram directly to your browser and integrated into the page. Through this integration, Instagram receives the information that your browser has called up the corresponding page of our website, even if you do not have an Instagram profile or are not currently logged in to Instagram. This information (including your IP address) is transmitted by your browser directly to an Instagram server in the USA and stored there.

If you are logged in to Instagram, Instagram can directly assign your visit to our website to your Instagram account. If you interact with the plugins, for example by clicking the "Instagram" button, this information is also transmitted directly to an Instagram server and stored there. The information is also published on your Instagram account and displayed there to your contacts.

For the purpose and scope of the data collection and the further processing and use of the data by Instagram, as well as your rights in this regard and setting options for protecting your privacy, please refer to Instagram's privacy policy: https://help.instagram.com/155833707900388/