

PRIVACY POLICY

PROCESSING OF PERSONAL DATA

The personal data collected on our website are processed in compliance with the requirements of Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, as well as with Organic Law 3/2018, of 5 December, on the Protection of Personal Data and the guarantee of digital rights.

We also guarantee that personal data are processed lawfully, fairly and in a transparent manner, and is collected for specified, explicit and legitimate purposes, and is kept limited to these purposes and updated if necessary. Data subjects will not be identified for longer than necessary and the security of the data will be guaranteed by appropriate technical and organisational measures.

Who is responsible for the processing of your personal data?

Controller: CYKLIK URBAN BIKES SL

Address: Calle María de Luna 11, Nave 10 CP.50018, (CEEI Aragón), ZARAGOZA, ESPAÑA

NIF: B99528366

Telephone: 976051908

E-mail: info@cyclicbikes.com

What do we process your data for and what do you allow us to do? Why can we process your data?

Personal data will be processed by the controller when you provide them by completing the registration or contact forms, sending emails, using the chat or calling us.

The data will be processed for the purpose of managing your registration as a user, providing the service requested, complying with legal obligations, communicating with the user by any means and answering to queries and requests for information.

- Manage the registration as a user. When the user registers voluntarily on our website, we collect their data with their consent in order to formalise their registration as a user and to keep the information that will allow us to provide our services and maintain contact.
- Provide the requested service. We process the data to provide our services by managing orders, billing them, and communicating regarding the development of the service by e-mail or by telephone if necessary, in compliance with the contractual rela-

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tionship.

- Comply with legal obligations. We will carry out certain processing in compliance with legal obligations such as tax or accounting, disclosing the data with the competent public administrations when necessary.
- Answer queries and requests for information. When you send us a query or request for information, we will process your data with your consent to answer to your query or request.
- Communicate commercially with the users by any means:
 - When the customer registers on our website and gives us his express consent, checking the box to that effect, we can communicate commercially with him by electronic means about our products, services, and activities.
 - When the user registers an e-mail address in our form for this purpose, we process the data with his consent to keep him informed by periodic electronic means about our services and activities.

The user may object to each of the communications sent and additionally by means of the mechanism provided in the section "What are your rights?"

- Consider candidates for our selection processes. If the user provides us with a curriculum, their data will be used to incorporate it into present and future selection processes in our entity and to communicate with them even by electronic means in relation to their candidacy.
- Participation in competitions, draws or promotions. We will process your personal data to manage your participation, as well as to communicate the condition of winner respecting in any case the specific Legal Bases of each promotion.
- If you pay by PayPal, you will be automatically and securely redirected to the PayPal website. In relation to the processing of payments, the data processed by the controller will be provided by PayPal and will consist of your name, address, e-mail and telephone number. Please refer to the General Terms and Conditions, Terms of Use and Privacy Policy of PayPal (Europe) on the website: www.paypal.com
- Use data storage and retrieval devices. When the user visits our page, we will use, with their consent, cookies and other tools for the purposes set out in our Cookie Policy where they can access further information.
- By means of the information obtained from data tracking, storage and recovery devices with the consent of the visitors who browse the web pages, and the analysis of

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their browsing and behaviour, we will carry out the preparation of commercial customer profiles that will allow us to send personalised electronic commercial communications to those users who identify themselves with an e-mail. Additional information can be found in the Cookie Policy.

- We also use "Google reCAPTCHA" ("reCAPTCHA") on our websites. reCAPTCHA is used to check whether data entered on our website (e.g. on a contact form) has been entered by a person or by an automated program. To this end, reCAPTCHA analyses the behaviour of the website visitor according to various characteristics. This analysis starts automatically as soon as the website visitor accesses the site. For the analysis, reCAPTCHA evaluates various information (for example, the IP address, the time the visitor has been on the website or the mouse movements made by the user). The data collected during the analysis will be sent to Google. The reCAPTCHA analysis are carried out completely in the background. The processing of the data is based on a legitimate interest in protecting our site against spam and abusive automated tracking. For more information about Google reCAPTCHA and Google's privacy policy, please use the following links: <https://www.google.com/intl/es/policies/privacy/> and <https://www.google.com/recaptcha/intro/android.html>

Who do we provide your data to?

We may disclose personal data to third party providers in charge of processing, such as Livebeep, with the sole purpose of providing certain services to us following our instructions without using the data for their own purposes and in order to carry out the activities that are ours, or to the competent public administrations in compliance with legal obligations.

How long do we keep your data?

Generally, the data will be kept for as long as it is compatible with the purpose for which it was collected and in compliance with legal obligations to keep it and then deleted.

Data collected for the purpose of commercial communication will be kept for as long as this purpose remains or the user objects to the processing.

What are your rights?

You may:

1. Obtain more information
2. Withdraw your consent when you have given it for a particular processing
3. Stop receiving our commercial communications by sending "I want to stop receiving commercial communications" to info@cyclicbikes.com
4. Exercise your rights to:

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- Access, or know what personal data we process about you;
- Rectify, or correct incorrect or inaccurate personal data;
- Erasure, or to remove personal data we hold about you that we are not legally obliged to keep;
- Object, or to have us stop processing your personal data for a specific purpose;
- Restrict processing, or restricting the processing we do;
- Data portability, or to provide you with personal data held by us;

In order to exercise any of the rights granted to you by the data protection regulations, you may request a form from the controller for exercising these rights or directly download any of the forms proposed by the Spanish Data Protection Agency through this link and present it completed together with a copy of your National Identity Document or any other valid identification document at CYKLIK URBAN BIKES SL, Calle María de Luna 11, Nave 10 CP.50018, (CEEIARAGÓN), ZARAGOZA, ESPAÑA, or through info@cyclicbikes.com

You can find more information about your rights or file a complaint with the competent supervisory authority at the Spanish Data Protection Agency <http://www.agpd.es> - C/ Jorge Juan, 6. 28001 - Madrid (901 100 099 - 912 663 517).

How do we guarantee the security of your data?

We have taken appropriate technical and organisational measures to ensure an adequate level of security to prevent the accidental or unlawful destruction, loss or alteration of personal data or unauthorised disclosure of or access to such data.

We have also put in place procedures to respond within the appropriate legal timeframe to any security breach that may occur in relation to your personal data.

When contracting suppliers, we guarantee that they implement the appropriate security measures for the protection of personal data.

Changes to the Privacy Policy

We have updated this Policy to adapt it to the requirements and obligations of the General Data Protection Regulations.

This last Policy is dated: October 21th 2020