

SIGNATURIT PLATFORM PRIVACY POLICY

Through this Privacy Policy, which complies with the provisions of European Regulation 679/2016, of April 27, on the Protection of Natural Persons with regard to the Processing of Personal Data (hereinafter, GDPR) and the Organic Law on Data Protection and Guarantees of Digital Rights (hereinafter, LOPDGDD), we inform you of all aspects relating to the processing of personal data of the different categories of natural persons who use the services offered by Ivnosys Soluciones S.L.U. on this "Signaturit Platform."

Identity of the Service Provider.

Ivnosys Soluciones SLU (Signaturit Group)

Tax ID: B-98333362.

Address: Acceso Ademuz No. 12, 1st Floor, Office 1, 46980 Paterna (Valencia)

Email address for exercising rights related to data protection: dpo@signaturit.com

Telephone: (+34) 960 031 203

You can find more information about the Provider and Signaturit Group at the following link:

<https://www.signaturit.com/legal-notice/>

What will you find in this document?

SECTION I - RECIPIENTS OF ELECTRONIC SIGNATURES AND ELECTRONIC DELIVERIES.

In Section I you will find the Privacy Policy applicable to Recipients of electronic signature and electronic delivery (eDelivery) flows sent from the Signaturit Platform, i.e., persons who do not have a user account and therefore have not been previously registered.

SECTION II - REGISTERED USERS

In Section II you will find the Privacy Policy applicable to Users registered on the Signaturit Platform and who therefore have an account to generate electronic signatures and eDelivery flows addressed to Recipients.

SECTION III - SERVICE SUBSCRIBERS (CLIENTS WHO CONTRACT THE PLATFORM).

In Section III you will find the Privacy Policy applicable to the Subscribers of the services who can also be Registered users of the Signaturit Platform.

SECTION I - RECIPIENTS OF ELECTRONIC SIGNATURES AND E-DELIVERY.

I.1. Nature of the service - Purpose of data processing

The document or communication you have received has been sent to you through Ivnosys Soluciones SLU. (hereinafter the "Provider") acting as Data Processor or Sub-processor, following the instructions of our Client (Subscriber of the services). Therefore, your personal data has been provided to us by our Client, who is at the origin of the creation of the electronic signature or eDelivery process and who acts as the Data Controller of the data that the Provider uses to fulfill said assignment.

This Privacy Policy is compatible with the privacy policies that the Data Controller has established in its previous relationship with you. In this regard, if the Recipient uses our platform or our solutions because the Data Controller has referred them to these, in addition, taking into account the conditions set forth herein, they must ensure that

said Sender (Employer, Service Provider, Client, or others), as Data Controller or Data Processor, has informed them of the privacy policy that may be applicable to them.

The identification of the Data Controller (the Provider's Client) appears as such in the email or SMS you have previously received to access the electronic signature or eDelivery process.

As the owner of the platform that you access as the Recipient of a shipment, the Service Provider informs you that the purpose of processing your data is to be able to provide the trusted services that we offer to the Data Controller, as well as to fulfill the purposes of the different functionalities of our platform:

- To send certain information regarding specific documentation.
- To verify the accuracy of certain data related to the sending and/or delivery of the same, such as verifying the receipt of a specific email by a user or a third party.
- Signing the documentation sent.
- Authenticating recipients.
- Verifying the date on which the signature was made or the time and place from which the document or information received was signed or validated.

I.2. Processing of personal data

I.2.1. In electronic document signing processes:

The following data will be processed:

- First and last names
- Email address and/or telephone number
- IP address
- Web browsing data
- The personal data that our client enters in the open fields, in the body of the messages and in the documents sent to them through the platform.
- Additionally, the following data may be required depending on the type of process configured by the Customer when setting up the shipment:
 - Identity document and the personal data it contains
 - Biometric Signature Data.
 - Personal data and, where applicable, corporate data contained in the digital certificate, as well as its serial number. (In the case of use of a digital certificate signature).

I.2.2. In certified eDelivery processes via email or SMS:

The following data will be processed:

- First and last names
- Email and/or phone number
- IP address
- Web browsing data
- The personal data that our client enters in the open fields, in the body of messages and in the documents sent to us through the platform.

I.3. Data retention period.

Your data will be kept for the time determined by the Data Controller in each case, as contractually established at any given time with the Data Processor, and by default, it will be kept for 5 years by the Provider at the disposal of the Data Controller.

I.4. Exercise of recipients' rights

To exercise the following data rights, you must send your request to the Data Controller who sent you a signature request or eDelivery and whose identity appears in the email or SMS you received.

In any case, the Provider, in its capacity as Data Processor or Sub-processor, will provide support for such exercise. You may send your request to dpo@signaturit.com, which we will forward to the Data Controller so that they can respond to your request to exercise your rights and decide on it.

In order to comply with the principles of information and transparency, basic information on the rights provided is briefly detailed below:

Access	By exercising this right, you can find out what personal data of yours is being processed by the Provider, its purpose, its origin, and whether it may be transferred to third parties.
Rectification	This consists of being able to modify your personal data that is inaccurate or incomplete, specifying in the request which data you wish to be modified.
Object	With the right to object, you can object to the processing of your data in cases such as: advertising and commercial prospecting activities or when such processing is intended to make a decision about you based solely on automated processing of your personal data.
Portability	You may receive your personal data in a structured, commonly used, and machine-readable format and transmit it to another controller, where technically feasible.
Deletion or right to be forgotten	You may request the erasure of your personal data without undue delay in any of the cases provided for. For example, unlawful data processing, or when the purpose for which the data was processed or collected no longer exists.

The final decision on the exercise of your rights will be made by the Data Controller and may be communicated to you either by the Data Controller or by the Provider/Data Processor.

In any case, we inform you that, in accordance with the provisions of Article 15 of the GDPR in relation to the provisions of Article 13 of the LOPDGDD, the user Recipient may lodge a complaint related to the exercise of their rights, where appropriate, with the AEPD (Spanish Data Protection Agency), C/ Jorge Juan, 6, 28001- Madrid or on the AEPD website: www.aepd.es

1.5. Consent for the processing of personal data - Express consent for the processing of biometric signatures.

Through the relationship that the Recipient maintains with the Data Controller:

The purpose of the processing carried out by the Provider is to provide trusted services to its Clients (Data Controllers) and to be able to validate the information that the Recipient has received, accepted, and/or signed through the platform. In this case, the Provider will collect your data, as Data Processor, for the purpose of providing the service contracted by said Clients, undertaking not to use it for any other purpose for which it is necessary.

Before being able to send their response or take any action, the Recipient will be notified of the Privacy Policy that will apply to them.

Express acceptance of this Privacy Policy is necessary in order to use the services offered by the Signaturit Platform.

Through the collection of the Recipient's signature:

The biometric electronic signature provided by the Provider incorporates biometric technology when associated with the use of an appropriate device for collecting biometric information, which allows us to capture biometric data from the signer's graph, such as speed, acceleration, pressure, or pseudo-pressure. Therefore, when a signer signs a document using our biometric electronic signature, we will be collecting their biometric data on behalf of our Clients, which implies obtaining their express consent in accordance with the provisions of European Regulation 679/2016 (Art. 9.2).

For this reason, you are required to provide additional specific consent if you sign the document received using the biometric signature option offered by the Signaturit Platform.

In accordance with the provisions of the GDPR (Art. 9.2), we hereby inform you in advance about the use and processing of your biometric signature for signing documents through the solution, and you must freely, expressly, and unequivocally accept the use, processing, and storage of your biometric personal data (special category of personal data) by the Provider (Data Processor or, where applicable, Sub-Processor) and on behalf of its Clients or Data Controllers (or, where applicable, Data Processors), who will apply the necessary measures for its custody and security in accordance with the GDPR and for the purposes expressed in this Policy.

Likewise, once express consent has been obtained for the processing of this biometric data, it will be encrypted within the document and may not be used by the Provider under any circumstances, without prejudice to the exceptions provided for in the regulations on the protection of personal data, such as a court order.

SECTION II - REGISTERED USERS

II.1. Nature of the service - Purpose of data processing.

The User registered on the Signaturit Platform is the result of a contractual relationship between a Client and the Provider. The registered User is the owner of a "user account" through which they can send documents for signature and electronic delivery to other Users registered by the same Client or by other Clients of this electronic signature Platform, or to third-party Recipients who have no relationship with this platform.

Express acceptance of this Privacy Policy is necessary for the creation of each user account and to be able to use the services offered by the Signaturit Platform.

As owners of the Platform you are accessing, we inform you that the purpose of processing your data is to be able to provide the services we offer to the Data Controller through the creation of registered Users on this platform for the use of the functionalities and purposes described below:

- To send certain information regarding specific documentation.
- To verify the accuracy of certain data related to the sending and/or delivery of said documentation, such as verifying the receipt of a specific email by a user or a third party.
- Signing the documentation sent.
- Authentication of the parties.
- Verifying the date on which the signature was made or the time and place from which the document or information received was signed or validated.

II.2. Processing of personal data

The following data will be processed:

- First and last names
- Corporate email address
- Telephone number
- Company and job position

Additionally, and in order to carry out the corresponding data processing, the Provider will safeguard and manage your personal data with the utmost diligence, applying criteria of limitation and minimization.

II.3. Data retention period.

Your data will be kept for the time determined by the Data Controller in each case, as contractually established at any given time with the Data Processor, and by default, it will be kept for 5 years by the Provider at the disposal of the Data Controller.

II.4. Exercise of rights by registered Users

To exercise the following data rights, you must address your request to the Data Controller who owns the customer account and who has indicated to us their desire to register you as a registered User on the platform. In any case, the Provider, in its capacity as Data Processor or Sub-processor, will provide support for such exercise. You may send your request to dpo@signaturit.com, which we will forward to the Data Controller so that they can respond to your request to exercise your rights and decide on it.

In order to comply with the principles of information and transparency, basic information on the rights provided is briefly detailed below:

Access	By exercising this right, you can find out what personal data of yours is being processed by the Provider, its purpose, its origin, and whether it may be transferred to third parties.
Rectification	This consists of being able to modify your personal data that is inaccurate or incomplete, specifying in the request which data you wish to be modified.
Object	With the right to object, you can object to the processing of your data in cases such as: advertising and commercial prospecting activities or when such processing is intended to make a decision about you based solely on automated processing of your personal data.
Portability	You may receive your personal data in a structured, commonly used, and machine-readable format and transmit it to another controller, where technically feasible.
Deletion or right to be forgotten	You may request the erasure of your personal data without undue delay in any of the cases provided for. For example, unlawful data processing, or when the purpose for which the data was processed or collected no longer exists.

The final decision on the exercise of your rights will be made by the Data Controller and may be communicated to you either by the Data Controller or by the Provider. In any case, we inform you that, in accordance with the provisions of Article 15 of the GDPR in relation to the provisions of Article 13 of the LOPDGDD, the registered User may lodge a complaint related to the exercise of their rights, where appropriate, with the AEPD (Spanish Data Protection Agency), C/ Jorge Juan, 6, 28001- Madrid or on the AEPD website: www.aepd.es

SECTION III – SERVICE SUBSCRIBERS (CLIENTS)

III.1. Nature of the service – Purpose of data processing

The personal data contained in the online service contract form or in the purchase orders, as well as those provided during the business relationship, will be processed by the Provider for the purpose of managing the contractual relationship, invoicing and collecting payment for the contracted services, sending commercial communications related to the provision of the service, etc., including the communication of such data to other companies in the Signaturit Group (included in the [Legal Notice](#)) for the purpose of centralizing administrative and IT processes.

In addition, the data may be transferred to the banks necessary to carry out such management and to the public administration in the cases provided for by law, and in any case where required by law or by the competent authorities. Similarly, the data may be transferred to Data Processors for the provision of ancillary services to the Signaturit Group. No international transfers are planned.

Additionally, when you contract a service, a user account will be created for you, which will be subject to the privacy conditions set out in [SECTION II - REGISTERED USERS](#).

III.2. Legal basis

The basis for the legitimacy of data processing is the execution of the contract formalized during the online purchase process or through our commercial channel by signing the corresponding Purchase Order and its General Terms and Conditions.

The following personal data will be kept for the periods provided for by the laws applicable to each of the Parties.

Purpose	Personal Data Processed	Legal Basis	Retention Period
Personal Data processed during the contractual relationship	First and last names, ID number (only for freelance natural person) Corporate email address Telephone number Bank details	Execution of the contract	The time necessary for the maintenance of the contractual relationship.
Personal data processed for commercial purposes	First and Last Names Corporate email address Telephone number	Legitimate Interest	One year from the end of the contractual relationship.

The privacy conditions subject to the service are regulated in the [DPA available on our website](#). The security measures applied to the processing of your data are identical to those described in the DPA.

III.3. Data retention period.

Your personal data will be kept for the duration of the contractual relationship and duly blocked for the periods provided for by the laws applicable to each of the Parties.

III.4. Exercise of rights by Subscribing Customers

To exercise the following data rights, please send your request to . dpo@signaturit.com

In order to comply with the principles of information and transparency, basic information on the rights provided is briefly detailed below:

Access	By exercising this right, you can find out what personal data of yours is being processed by the Provider, its purpose, its origin, and whether it may be transferred to third parties.
Rectification	This consists of the right to modify your personal data that is inaccurate or incomplete, specifying in the request which data you wish to be modified.
Object	With the right to object, you can object to the processing of your data in cases such as: advertising and commercial prospecting activities or when such processing is intended to make a decision about you based solely on the automated processing of your personal data.
Portability	You may receive your personal data provided in a structured, commonly used, and machine-readable format, and be able to transmit it to another controller, provided that it is technically possible.
Deletion or right to be forgotten	You may request the deletion of personal data without undue delay when any of the circumstances listed below apply. For example, unlawful data processing, or when the purpose for which the data was processed or collected no longer applies.

In any case, we inform you that, in accordance with the provisions of Article 15 of the GDPR in relation to the provisions of Article 13 of the LOPDGDD, users Clients may lodge a complaint regarding the exercise of their rights, where applicable, with the AEPD (Spanish Data Protection Agency), C/ Jorge Juan, 6, 28001- Madrid, or on the AEPD website: www.aepd.es