

## PRIVACY POLICY

### 1. General Information

1.1 This privacy policy (“**Privacy Policy**”) of NAE COMUNICACIONES, S.L. (“**NAE**”) and / or any other company or affiliate of NAE’s Group (jointly referred as “**Group**”) is subject to the terms and conditions provided by Law 15/1999, December 13<sup>th</sup>, on Personal Data Protection (“**LOPD**”), the Royal Decree 1720/2007, December 21<sup>st</sup> which develops LOPD (“**RLOPD**”), and Law 34/2002, July 11<sup>th</sup>, on Information Society Services and Electronic Commerce (“**LSSI**”). LOPD and RLOPD derives from the Data Protection European Directive 95/46/CE approved by the European Parliament.

In this Privacy Policy you will find accurate description about (i) the data we collect or we are informed about you, (ii) what we do with it, and (iii) how you can manage and control the use of your information.

1.2 We inform you that your personal data shall be included in our data files duly registered at the Spanish Data Protection Agency (*Agencia Española de Protección de Datos*).

1.3 Notwithstanding certain circumstances requiring your express acceptance of some data processing, contracting, browsing and use of the services and content hosted on our files implies that you accept the latest version of the Privacy Policy published by NAE.

1.4 The acceptance of this Privacy Policy requires your commitment regarding the personal data you will communicate, such (i) all the information will be true and only will be related to you (not to other third person or people without their express consent), and (ii) the information provided will always be accurate, appropriate and update.

1.5 We recommend you to review this Privacy Policy frequently as its content may change in the future so that it can be adapted to new legal requirements or the new ways in which we may use your personal information. In all instances, we will try to notify you each time we substantially modify our Privacy Policy so that you are aware of the current version at all times.

### 2. Minors

2.1 According to our internal policies, we do not process data from minors under the age of eighteen (18). Therefore, if you are a minor under the age of eighteen (18), we ask that you not sign the contract regarding this project, not register or send us your personal information. If, we detect information related to users under the age of eighteen (18), we will delete it immediately.

2.2 In general, if you are a minor under the age of eighteen (18), we recommend you ask your parents or legal guardians for permission before sending any information about your person on the Internet.

2.3 NAE nor its Group will be liable under any circumstances from violations of this advice on the part of minor aged users.

### 3. Type of data processed by NAE or its Group

3.1 In order to provide you our services NAE and or its Group will process the following data<sup>1</sup>:

- (i) Name, surname, complete address (physical and email addresses), IP;
- (ii) Signal strength, cell ID, timestamp, (network location and GPS), where appropriate;
- (iii) Data speed (upload and download), handset manufacturer, router model, MMC version, where appropriate.

3.2 According to the purposes of the contract, NAE nor this Group will process information about your health, race, ideology, religion, beliefs, trade union membership or sex life.

### 4. Identity of the responsible of processing your data

Your personal data will be incorporated into a data file named "Clients and Suppliers" which is responsible NAE or the corresponding affiliate. The file is properly registered at the General Register of the Spanish Data Protection Agency (*Agencia Española de Protección de Datos*) in accordance with the provisions set forth in the Title IV Chapter II of the LOPD.

### 5. Use of your personal data

5.1 The personal data you provide us or we are be informed will be used to process and manage the services provided by NAE or its Group as per the contract subscribed (including, but not limited to, answering questions, providing reports, providing data regarding the coverage for your network and speed tests, receiving newsletters etc.). Pursuant to the purposes of the contract, the personal data collected will be shared with service providers which may store that data in the United States of America.

5.2 We guarantee we will not share the personal information you provide us / we are informed to any third parties for their use unless you give us consent to do so or unless we are obligated by law.

5.3 Regarding the information collected about your location and IP, be informed that to use the device (*Sonda*) you will necessarily need to instruct your device to send such information via the privacy settings on that device, where appropriate ("**Device**").

5.4 We will use the location information collected from your Device exclusively to provide you with the information regarding coverage for your network and conduct speed tests in a concrete location. In case you have any queries about the privacy settings of your router, we suggest you contact the manufacturer of it or your mobile service provider for help.

5.5 We may retain certain information associated with your account in our archives, including for analytical purposes. The periods for which we retain your information depend on the purpose for which we collected it / we be informed.

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<sup>1</sup> Please, check if the personal data treated by NAE by virtue of the contract is accurate with the list hereby detailed.

- 5.6 We will not retain your personal information for longer than is necessary for our business purposes or for legal requirements. We may retain some information for a period of time after you have closed your account with us, for instance if this is necessary to meet our legal obligations.
- 5.7 The personal data processed will not be put to uses incompatible with the purposes for which they were collected or communicated. Data processing for historic, statistical or scientific aims shall not be deemed to be in compatible uses.

## **6. Security measures applied to your data**

We have implemented and maintain appropriate, administrative, technical, and organizational measures according to the type of data collected or communicated, and subject to the terms and conditions set forth in the RLOPD, to protect the personal information you provide us or we informed against unauthorized or unlawful access, and against accidental loss, damage, alteration or destruction of the data. Only authorized employees are permitted to access personal information, and they only may do so for permitted business functions. Notwithstanding the above, there may be wrongful acts committed by third parties even if we use all means at our disposal to avoid such acts. The service providers, which may not comply with the provisions set forth in LOPD and RLOPD, must comply with the European Union data protection standards.

## **7. Managing your personal data (ARCO rights).**

In any case, you can exercise your rights of access, rectification, cancellation and opposition (“ARCO Rights”) regarding your data by writing to NAE or its Group a communication to Urgell Street 204.1ºB of Barcelona, Spain or through the email address [support.medux.global@nae.es](mailto:support.medux.global@nae.es) . In all instances, and to ensure your security, you must verify your identity with a photocopy of your current identity document or passport to exercise your ARCO Rights.

## **8. Governing Law and Competent Jurisdiction**

This Privacy Policy is governed by Spanish law. Any dispute arising from this Privacy Policy or any claim related to the content and services rendered by NAE or by any of its affiliates shall be resolved by the judges and courts of Barcelona (Spain), and you expressly waive your own forum or any other that may apply to you.