

PRIVACY POLICY

In accordance with Regulation (EU) 2016/679 of the European Parliament and of the Council, of 27 April 2016, ONIXTRO, SL (hereinafter the DATA CONTROLLER), with NIF [Tax Identification Number] B02652592 informs Users that their personal data will be processed for the purpose of providing the requested services and sending information about our companies that might be of interest to them.

What user data do we process?

The DATA CONTROLLER might request the following personal data:

- Name
- Surname(s)
- Address
- Telephone number
- Photograph
- Bank details

Sending and recording of personal data

Sending personal data is obligatory to make contact and receive information about the services provided by the DATA CONTROLLER. Not providing the requested personal data or not accepting this data protection policy will mean it is not possible to subscribe to, register for or receive information about these services.

When the personal data are obtained from the data subject through electronic communication networks, in the framework of the provision of an information society service as well as in other cases expressly established by law or when authorised to do so by the Agencia Española de Protección de Datos [Spanish data protection agency], the DATA CONTROLLER must comply with the duty of information set out in article 13 of Regulation (EU) 2016/679 by providing the data subject with the following basic information as a minimum:

- a) The identity of the DATA CONTROLLER and its representative, where applicable.
- b) The purpose of the processing.
- c) How the data subject can exercise the rights set out in articles 15 to 22 of Regulation (EU) 2016/679.

However, the DATA CONTROLLERS, or where applicable their representatives, must maintain the record of processing activities mentioned in article 30 of Regulation (EU) 2016/679, unless the business or organisation employs fewer than 250 persons. This exception does not apply when the processing it carries out is likely to result in a risk to the rights and freedoms of data subjects, the processing is not occasional, or the processing includes special categories of data

as referred to in Article 9(1) or personal data relating to criminal convictions and offences referred to in Article 10 of Regulation (EU) 2016/679.

Finally, article 5(1)(f) of Regulation (EU) 2016/679 establishes the requirement to establish adequate security guarantees against unauthorised or unlawful processing and against the loss, destruction or accidental damage to personal data. This will involve implementing technical and organisational measures to ensure the integrity and confidentiality of the personal data and the possibility (article 5(2)) of demonstrating that these measures have been carried out in practice (accountability).

Accuracy and veracity of the data provided

Any User who sends information to the DATA CONTROLLER is solely responsible for the veracity and correctness of the data included, releasing the DATA CONTROLLER from any liability in this regard.

Users guarantee and are liable, in any case, for the accuracy, validity and authenticity of the personal data they provide, and they undertake to keep them appropriately up-to-date. The User agrees to provide complete and correct information on the registration or subscription form.

The DATA CONTROLLER is not liable for the veracity of any information that it has not produced itself and for which another source is stated, and so it accepts no liability for any potential damage that might derive from the use of this information. The DATA CONTROLLER is not liable for any damage the User might suffer as a consequence of errors, defects or omissions in the information provided by the DATA CONTROLLER whenever it comes from sources outside of the DATA CONTROLLER's control.

Sharing data with third parties

The DATA CONTROLLER will not share personal data with third parties. However, in the case that they are shared with any third party, prior notice will be given requesting the express consent of the data subject in accordance with article 4(11) of Regulation (EU) 2016/679.

Storage of the data

In any case, storage will be for the necessary period, and the data must be kept for a minimum of:

- 4 years: Labour Infringements and Penalties Act (obligations regarding membership, hiring, leave and termination, contributions, payment of salaries, etc.); Sec. 66 *et seq.* Spanish General Taxation Act (accounting books...)
- 5 years: Sec. 1964 Spanish Civil Code (action in personam with no specific period)
- 6 years: Sec. 30 Spanish Business Code (accounting books, invoices...)

- 10 years: Sec. 25 Spanish Prevention of Money Laundering and Funding of Terrorism Act.

Exercising rights of access, rectification, erasure, restriction, portability and objection

You can send communications and exercise your rights of access, rectification, erasure, restriction, portability and objection by writing to DATA CONTROLLER, PORTAL DE LA BARCA, 12 17004 GIRONA or to the email address meet@in2.art enclosing legally valid proof of identity, such as a photocopy of your DNI [national identity card], and putting "DATA PROTECTION" as the subject.

Acceptance and consent

The User confirms that he or she has been informed of the conditions of personal data protection, and accepts and consents to their processing by the DATA CONTROLLER, in the form and for the purposes stated in this Personal Data Protection Policy.

Changes to this privacy policy

The DATA CONTROLLER reserves the right to amend this policy to adapt it to changes in legislation or precedent and industry practices. In these cases, the DATA CONTROLLER will announce the changes introduced on this website with a reasonable advance notice of them taking effect.

* reCAPTCHA

We use the reCAPTCHA service of Google Inc. (hereinafter Google) to protect the data Users submit through the forms on the webpages. This service makes it possible to differentiate between data sent by people and automated messages. It involves transmitting the IP address and other data required by Google to use the reCAPTCHA service. For this end, the data will be sent to Google to be used. The IP address will be encrypted by Google in the member states of the European Union as well as in states associated with the European Economic Area. IP addresses will only be sent to Google's servers in the USA for encryption in exceptional circumstances. Google will use this information on behalf of the owner of this website to evaluate use of the service by Users. The IP address sent by reCAPTCHA will be kept separate from other Google data. The privacy policy of Google applies to these data. Full details about Google's privacy policy can be found at the webpage <https://policies.google.com/privacy?hl=en>

By using this reCAPTCHA service, the User consents to the processing of data about him or her that Google has in the form and for the purposes stated above.

SOCIAL MEDIA PRIVACY POLICY

In accordance with Regulation (EU) 2016/679, of 27 April 2016 (GDPR) and Spain's Information Services Society and Electronic Commerce Act 34/2002, of 11 July (LSSI-CE), ONIXTRO, SL (hereinafter the DATA CONTROLLER) informs Users that it has created profiles on the FACEBOOK, TWITTER, INSTAGRAM, PINTEREST, LINKEDIN, YOUTUBE, TIKTOK, BEACONS.AI, REDDIT and ODYSSEY social networks with the main purpose of publicising its products and services.

- **Data of ONIXTRO, SL**
- **Tax Id. No. (NIF): B02652592**
- **Address: PORTAL DE LA BARCA, 12 17004 GIRONA**
- **Telephone number: 972486844**
- **Email: meet@in2.art**
- **Website: www.in2.art**

The User has a profile on the same social network and has decided to subscribe to the page created by the DATA CONTROLLER, thus showing interest in the information published online. By subscribing to our page, Users consent to processing of the personal data published on their profiles.

Users can access the privacy policies of the social network itself at any moment, and can configure their profiles to guarantee their privacy.

The DATA CONTROLLER has access to and processes Users' public information, in particular, contact names. These data will only be used within the social network itself. They are not held on any file.

In relation to the User's rights of access, rectification, erasure, restriction, portability and objection, which can be exercised before the DATA CONTROLLER, in accordance with Regulation (EU) 2016/679, the following must be taken into account:

*Access: This will be defined by the functionality of the social network and the capacity to access information from user profiles.

*Rectification: This can only be exercised in relation to information that is under the control of the DATA CONTROLLER, for example, deleting comments published on its page. This right must normally be exercised before the social network.

*Cancellation and/or Objection: As in the previous case, this can only be exercised in relation to information that is under the control of the DATA CONTROLLER, for example, ceasing to subscribe to its profile.

*The option of transmitting data from one DATA CONTROLLER to another is provided for, and so the data subject has the right for his or her personal data to be transmitted directly when this is technically possible.

*Restriction: This is a provisional remedy that limits processing of personal data to storage. The cases in which the data subject has the right to obtain restriction of processing of data from the DATA CONTROLLER are set out in the regulation and are:

- If the data subject contests the accuracy of the personal data, for a period that allows the DATA CONTROLLER to verify their accuracy.
- If the processing is unlawful and the data subject objects to the erasure of the personal data and instead requests restriction of their use.
- If the DATA CONTROLLER no longer needs the personal data for the processing purposes, but the data subject needs them for the establishment, exercise or defence of legal claims.
- If the data subject has exercised his or her right of objection to processing, while it is verified whether the legitimate grounds of the DATA CONTROLLER prevail over those of the data subject.

The DATA CONTROLLER will carry out the following actions:

- Accessing public information from the profile.
- Publication any information already published on the DATA CONTROLLER's page on the User's profile.
- Sending personal and individual messages through the channels of the social network.
- Updating the status of the page, which will be published on the profile of the User.

Users can always control their connections, delete content that is no longer of interest to them and restrict who their connections are shared with. To do so, they must access their privacy settings.

Publications

The User, having subscribed to the DATA CONTROLLER's page, may post on it comments, links, images or photographs or any other type of multimedia content supported by the social network. The User must, in all cases, be the owner of these, hold the copyright and intellectual property rights or have the consent of the third parties affected. Any publication on the page, whether text, graphics, photographs, videos, etc. that violates or is liable to violate morals, ethics, good taste or decorum, and/or that infringes, violates or breaks intellectual or industrial property rights, the right to one's image or the law is expressly prohibited. In these cases, the

DATA CONTROLLER reserves the right to remove immediately the content and may request the permanent blocking of the User.

The DATA CONTROLLER accepts no liability for content that a User freely publishes.

Users must keep in mind that their publications will be seen by other Users, and that they are primarily responsible for their own privacy.

No images published on the page will be stored on any file by the DATA CONTROLLER, but they will remain on the social network.

Competitions and promotions

The DATA CONTROLLER reserves the right to hold competitions and promotions, in which Users who subscribe to its page may participate. The rules of each one will be published on the social network when its platform is used for them. They will always comply with Spain's Information Services Society and Electronic Commerce Act 34/2002, of 11 July (LSSI-CE) and with any other applicable regulation.

The social network does not sponsor, underwrite or administer any of our promotions in any way nor is it associated with any of them.

Advertising

The DATA CONTROLLER will use the social network to publicise its products and services, in any case, if it decides to process Users' contact details to carry out direct commercial prospecting, which will always be in compliance with the legal requirements of Regulation (EU) 2016/679 and of Spain's Information Services Society and Electronic Commerce Act 34/2002, of 11 July (LSSI-CE).

Recommending the DATA CONTROLLER's page to other Users so that they can also enjoy the promotions or be informed of its activity will not be deemed to be advertising.

Links to the social networks' privacy policies are provided below:

- Facebook, https://www.facebook.com/help/238318146535333?helpref=hc_fnav
- Twitter, <https://twitter.com/privacy>
- Instagram, <http://instagram.com/about/legal/privacy/>
- Pinterest, <http://es.about.pinterest.com/terms/>
- LinkedIn, http://www.linkedin.com/legal/privacy-policy?trk=hb_ft_priv
- Youtube, <https://www.youtube.com/static?template=terms&hl=es&gl=ES>
- Tik Tok, <https://www.tiktok.com/legal/privacy-policy-eea?lang=es>
- Beacons.ai, <https://privacy.beacons.ai/>
- Reddit, <https://www.redditinc.com/policies/privacy-policy-september-12-2021>
- Odysee, [https://odysee.com/\\$/privacypolicy](https://odysee.com/$/privacypolicy)

LEGAL NOTICE

In accordance with section 10 of the Spanish Information Society Services and Electronic Commerce Act 34/2002 of 11 July (LSSI-CE) the company's identifying data are given below:

- **Company name: ONIXTRO, SL**
- **NIF [tax Identification number]: B02652592**
- **Address: PORTAL DE LA BARCA, 12 17004 GIRONA**
- **Telephone number: 972486844**
- **Email: meet@in2.art**
- **Companies Registry of Madrid Volume 40964, Book 0, Folio 174, Section 8, Page M726631, Inscription 1.**

Purpose of the webpage

The purpose of this webpage is to respond to your consultations and requests.

This legal notice (the "Legal Notice") governs the use of the website www.in2.art

Legislation

For all purposes, the relationships between ONIXTRO, SL (hereinafter the DATA CONTROLLER) and Users of the electronic services present on this website are subject to Spanish legislation and jurisdiction.

Use and access by Users

Users are informed that accessing this website in no way initiates a commercial relationship with the DATA CONTROLLER or any of its subsidiaries and they accept this.

Intellectual and industrial property

The intellectual property rights of the content of the webpages, their graphic design and their codes are the property of the DATA CONTROLLER and so any reproduction, distribution, public communication or transformation of them or any other activity that might be performed with the content of the webpages is forbidden, even if the sources are cited, unless with the written consent of the DATA CONTROLLER.

Content of the website and links

The DATA CONTROLLER reserves the right to update, alter or eliminate the information contained on its webpages and may also restrict or block access to this information by certain Users.

The DATA CONTROLLER does not accept any liability for information contained in third-party websites that can be accessed by links from any webpage that belongs to the DATA

CONTROLLER. The presence of links on the webpages of the DATA CONTROLLER is solely for informational purposes and in no case comprises a suggestion, invitation or recommendation.

COOKIES POLICY

ONIXTRO, SL (hereinafter the DATA CONTROLLER) sets out its Cookies Collection and Processing Policy in this document, in accordance with section 22.2 of Spain's Information Services Society and Electronic Commerce Act 34/2002, of 11 July (LSSI-CE).

Cookies are saved on the User's terminal equipment (computer or mobile device) and collect information when visiting the webpage www.in2.art, with the purpose of improving the website's usability, and understanding Users' browsing habits and needs in order to be able to adapt to them, as well as obtaining information for statistical purposes. In the case of Users who are already clients of the DATA CONTROLLER, the information collected by the cookies will also be used to identify them when they access the different tools that the DATA CONTROLLER makes available for managing the services.

This Cookies Policy will apply to Users who voluntarily visit the webpages of the DATA CONTROLLER, complete data collection forms, access the tools that the DATA CONTROLLER provides to its clients for managing its services, or use any other service present on the website that entails sharing data with the DATA CONTROLLER or access to data by the DATA CONTROLLER for the provision of its services.

The DATA CONTROLLER informs Users of its webpages of the existence of cookies and provides this Policy for the purpose of informing them about the use and purpose of the cookies. By continuing to browse its pages, Users acknowledge that they are aware of and accept this Policy.

The DATA CONTROLLER uses the following types of cookie:

Classified by ownership:

- First-party cookies: sent and managed directly by the DATA CONTROLLER.
- Third-party cookies: sent and managed by a third party other than the DATA CONTROLLER, anonymously, for the purpose of carrying out statistical studies of browsing of the DATA CONTROLLER's webpages.

Classified by purpose:

- Technical and/or personalisation cookies: these facilitate browsing by identifying the session, allowing access to restricted-access tools and customising the available options. These enable the provision of the service previously requested by the User.
- Analytical and/or advertising cookies : these make it possible to know the number of visits made to different sections of the webpages and the habits and tendencies of Users and they consequently make it possible to improve browsing and the service offered by the DATA CONTROLLER (fundamentally, Google Analytics*), as well as managing the advertising spaces included in the webpage visited by the User. These collect anonymous data with the purpose of creating browsing profiles of Users.

Classified by duration:

- Session cookies: these collect and store data while the User is accessing the webpage.
- Persistent cookies: these collect and store data on the User's terminal for a variable time period depending on the purpose for which they are used.

The storage time of the cookies will depend on the type in question and will always be the minimum indispensable to fulfil their purpose.

In any case, Users can configure their browser to deactivate or block all or some of the cookies. Not accepting these cookies does not prevent access to the information on the websites of the DATA CONTROLLER although the use of some services might be restricted. Users who wish to withdraw consent to receive cookies after having given it will need to delete the cookies saved on their devices through the options of the different browsers.

How to configure different browsers to carry out the actions described in the paragraphs above can be consulted at:

- Explorer: <https://support.microsoft.com/en-us/windows/delete-and-manage-cookies>
- Chrome: <https://support.google.com/chrome/answer/95647?hl=en>
- Firefox: <https://support.mozilla.org/en-US/kb/cookies-information-websites-store-on-your-computer>
- Safari: <https://support.apple.com/en-gb/guide/safari/sfri11471/mac>
- Opera: <https://help.opera.com/en/latest/web-preferences/#cookies>

Google Analytics extension

This webpage uses Google Analytics, a web analytics service provided by Google Inc. (hereinafter Google). Google Analytics uses cookies. These are text files that are saved on the computer and enable analysis of User behaviour online. The information that these cookies generate about how Users use the webpage is generally transmitted to and stored on the servers of Google in the United States. If the anonymous IP address option is activated on the webpage, the IP address will not appear as complete within European Union countries or in other countries that have agreed to this within the economic space of the European Union. The full IP address will only exceptionally be sent to a Google server in the United States and once there it will be shortened. Google will only use this information with the agreement of the User for the purpose of evaluating the User's behaviour on the webpage, generating reports on the web activities and offering the owner of the page services related to web and internet use. The IP address that your browser transmits in the framework of Google Analytics will not be

associated with other Google data. Users can prevent cookies from being saved by configuring the browser they use so that it does not save cookies. This setting might affect the full functioning of the webpage. By using this website, the User agrees to the processing of data by Google as described above. The User can also avoid the recording of data generated by the cookies and of data relating to the use of the webpage (including the IP address), as well as the processing of these data by downloading and installing the following browser plugin available through this link: <http://tools.google.com/dlpage/gaoptout>

More information about the terms and conditions of use and privacy policy is available in the [Google Analytics conditions of use](#) or in the [general conditions of Google Analytics](#). Bear in mind that on this page the Google Analytics code includes the tag “gat._anonymizelp ();”, which ensures that IP addresses are collected anonymously (IP masking).