



DATA PROCESSING ADDENDUM

This Data Processing Addendum (this "Addendum") forms part of the posted online terms of service located at: <https://www.spreedly.com/terms-of-service> (the "Agreement") between SPREEDLY, INC. ("Spreedly") and PEPPER ASSETS SERVICES, S.L.U. ("Customer"). This Addendum applies where, and to the extent that, Spreedly processes personal data of data subjects on behalf of Customer when providing the Service (as defined under the Agreement). All capitalized terms not defined in this Addendum shall have the meanings set forth in the Agreement.

In consideration of the mutual obligations set forth herein, the parties agree to the terms and conditions of this Addendum, effective as of the effective date of the Agreement.

1. The parties acknowledge that (i) Customer is the data processor of its Spanish fully-owned company PEPPER FINANCE CORPORATION, S.L.U., a Spanish private limited company existing under the laws of Spain, with its registered offices at 13th C1 Floor, calle Juan Esplandiú Madrid, C.P. 28007, (Spain), provided with Spanish VAT Number n° B-86961612 ("PFC"), and (ii) PFC is the data controller of all the personal data that may arise from its direct contractual relationships with its clients. As a result, the parties acknowledge that the Spreedly will act as Customer's data sub-processor with respect to processing PFC clients' personal data.

2. Additionally, any other third party Spreedly engages that processes personal data on behalf of Spreedly with respect to the Service and/or related with the Agreement shall also be considered a data sub-processor (or any other similar figure according to UE's GDPR rules). Spreedly will provide its best efforts in order to inform this circumstance to any third party related to the Service described and to be provided under the Agreement.


[Signatures on Next Page]



CONFIDENTIAL

The Parties have executed this Addendum by their duly authorized representatives in one or more counterparts, each of which will be deemed an original.

SPREEDLY, INC.

By: 
BE108849DB824F9...
Name: Nellie Vail
Title: CFO
Date: 8/31/2022

PEPPER ASSETS SERVICES, S.L.U.

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digitalmente por
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