

## **GENERAL PRIVACY POLICY OF THE WEBSITE: Trace Logistics**

### **Privacy Policy**

#### **1. Introduction**

The right to privacy, and specifically the right to personal data protection is one of the values of TRACE LOGISTICS, S.A., a company of the Fluidra Group, (hereinafter "Trace Logistics"), which is included in our Code of Ethics.

The purpose of this policy is to explain how Trace Logistics will treat personal data that may be collected through the various forms that can be found on the "Trace Logistics" platform. Your personal data will be treated confidentially and only for the purposes for which you have been informed, as explained below in this General Privacy Policy and in each of the specific privacy policies for each of the different forms.

#### **2. Commitment to privacy**

Trace Logistics is fully committed to compliance with the legislation and General Data Protection Regulation of the European Union and the regulations relating to the protection of personal data, being a priority objective for Trace Logistics.

For this reason, Trace Logistics has decided to implement the following principles, privacy being the basis on which all processing operations are based.

- Transparency in data processing is one of our priorities, so whenever we collect personal data about you, we will duly inform you in the corresponding privacy policy of the purposes of such processing.
- We will always process the data that are strictly necessary to carry out the informed treatment.
- We will never force you to provide personal information, unless it is really necessary to provide the service you request.
- Whenever possible, we will provide you with easy ways to control your personal data.
- Your data will not be transferred, sold, rented or otherwise made available to any third party, except to those service providers of Trace Logistics, who perform certain activities for Trace Logistics, but who will in no case process the data for their own purposes. Some of these providers may be located outside the European Union, as indicated in the "International Transfers" section.

### **PURPOSES OF PROCESSING, BASIS OF LEGITIMACY AND STORAGE PERIODS**

Trace Logistics collects your personal data in order to process your requests and to offer you the services and products you may be interested in.

Depending on your interaction on the site, your personal data will be processed for the following purposes and in accordance with the following grounds of legitimacy.

Contact		
Purpose	Legal grounds	Storage period
To respond to your inquiries, questions and requests made through the contact form.	<p>The basis of legitimacy is the legitimate interest of Trace Logistics in responding to your queries.</p> <p>The benefit for Trace Logistics is to be able to establish a potential pre-contractual relationship with the interested party, thus being able to know precisely the needs of the latter.</p> <p>The benefit for the interested parties is to be able to receive clear and concise information regarding their queries or requests.</p> <p>For more information on legitimate interest, please refer to section 5 of this privacy policy.</p>	All data you provide will be processed for the time needed to fulfill your request or inquiry.

Work with us		
Purpose	Legal grounds	Storage period
<p>Management of your application for the selected vacancy, as well as to contact you for any necessary management in relation to such vacancy, by any means, including electronic means such as email, telephone, SMS, or any other appropriate means to fulfill such purpose.</p> <p>Please note that the management of such vacancy may involve:</p> <ul style="list-style-type: none"> <li>(i) Check their academic or employment background, in accordance with current regulations;</li> <li>(ii) Invite you to make the relevant interviews, tests, level, skills or aptitude tests;</li> <li>(iii) (viii) To request references from the</li> </ul>	<p>The basis of legitimacy is the pre-contractual relationship that binds the parties.</p>	<p>Personal data obtained in the selection process will be retained for the duration of itself. For 1 year after the process is completed.</p> <p>In the event that you are selected for the vacancy and you accept the offer from Trace Logistics, your personal data will be retained for the duration of the relationship between you and Trace Logistics, as you will be informed in more detail in that moment.</p>

(iv)	persons you have provided us with; (ix) Any other type of test or action that may be relevant to the job for which you are applying.		
(v)	(x) In the event that your application is selected for the job and you accept the offer from Trace Logistics, we may process your data in order to prepare the signing of the contract between you and Trace Logistics.		

Users account in My Trace Logistics		
Purpose	Basis of legitimacy	Storage period
Provide access to certain restricted sections of the website, such as tracking the status of your orders.	The basis of legitimacy is the contractual relationship between the parties.	The data you provide will be processed for as long as you keep your account active, that is, for as long as you maintain your contractual relationship with Trace Logistics.
Allow you to access, through your account created on the platform, to the different services of the same.		

Tracking the delivery status of your order		
Purpose	Basis of legitimacy	Storage period
Provide information regarding the delivery of your order.	The basis of legitimacy is the contractual relationship between the parties.	The data you provide will be processed for as long as it is necessary for the contractual relationship between you and Trace Logistics.

Without prejudice to informing you of this in the Privacy policies of data collection forms, on some occasions it may be necessary to process your personal data in order to comply with legal obligations or accordance with any contractual relationship we may have with you.

In all other cases, and whenever appropriate, we will request your consent to process your personal data.

#### **4. Duration of processing and storage period.**

Trace Logistics is committed to processing personal data for as long as it is really useful to us and we can provide you with a quality service through its exploitation. Therefore, we will make all appropriate and reasonable efforts to minimize the period of processing and storage of personal data.

In this sense, in the second section of this Privacy Policy we inform you of the expected period of treatment and/or conservation of your personal data.

In any case, and even if you request us to remove your data, we may keep them and maintain them, under proper blocking, for the period necessary to comply with our legal obligations and to make them available to the competent authorities in the different applicable matters.

## **5. Internacional transfers**

Trace Logistics, as an entity with international projection, has international suppliers that may provide their services from outside the EU, so it is possible that your data may be processed outside the European Union or the European Economic Area.

In any case, Trace Logistics will ensure that such data processing is always protected with appropriate safeguards, which may include:

- **EU-approved standard clauses:** These are contracts approved by the European regulator, which provide sufficient guarantees to ensure that the processing complies with the requirements established by the European Data Protection Regulation.
- **Third-party certifications:** For example, framework agreements between the EU and third parties that establish a standardized framework for data processing in accordance with the requirements of the European Data Protection Regulation.

## **6. Exercise of rights and complaints before the AEPD.**

As a consequence of processing your personal data by Trace Logistics, the legislation in force grants you different rights. Below, we provide a summary explanation of each right, in order to make it easier for you to exercise them:

1. **Right of access:** You have the right to know what personal data we process about you and the purposes for which we process it.
2. **Right of rectification:** Your data will always be yours, and as such, you may ask us to rectify it at any time if the data in our records is incorrect.
3. **Right of deletion:** You may request, at any time, the deletion of your personal data from our files. However, and as indicated in the section on data retention above, please note that in certain circumstances, compliance with current legislation may prevent the effective exercise of this right.
4. **Right to object:** You may object to the processing of your data in relation to any of the purposes for which we process your data, in accordance with the privacy policies applicable in each case.
5. **Right of limitation of processing:** You may request the limitation of processing in the following cases:
  - a. If you believe that the data we hold about you is not correct or accurate;
  - b. If, in case you consider that we are not processing your data in a legitimate way, but you prefer that we limit the processing of such data to its removal;
  - c. If the data we hold is no longer required by us for the purpose for which we collected it, but you need us to retain it to pursue legal claims;
  - d. If, having exercised your right to object to any processing, you have not yet received a response from us.
6. **Right to data portability:** You have the right, where technically feasible and reasonable, to request that personal data that you have provided directly to us be transferred to another data controller. If possible, we will provide your data directly to such other controller, but if not, we will provide it to you in a standard format.

Whenever we process your data on the basis of your consent, you may revoke it at any time, with no consequences for you other than, depending on the right exercised, not being able to provide you with certain services.

You can exercise your rights by contacting Trace Logistics by e-mail at [dataprivacy@fluidra.com](mailto:dataprivacy@fluidra.com), with the reference "Personal Data".

In addition, if you consider it necessary, you may contact our Data Protection Officer at the e-mail address [dataprivacy@fluidra.com](mailto:dataprivacy@fluidra.com), under the reference "DPO".

If you have any questions or complaints about how we treat your personal data, or any other matter related to the subject, you can contact our DPO, to the attention of the "Data processor", by email to the address [dataprivacy@fluidra.com](mailto:dataprivacy@fluidra.com). If you do not receive a response within a reasonable period of time, you may file a complaint before the Spanish Data Protection Agency.

## **7. Confidentiality and Security in data processing**

Your personal data is very important to us, and we undertake to treat it with the utmost confidentiality and discretion, as well as to implement all security measures we deem appropriate and reasonable.

In this sense, Trace Logistics declares and guarantees that it has established all the technical means at its disposal to prevent the loss, misuse, alteration, unauthorized access and theft of data provided by users.

## **8. Social Networks**

Social Networks are part of the daily life of many Internet users, and for them we have created different Trace Logistics profiles.

All users have the opportunity to join the pages or groups that Trace Logistics has in different social networks.

However, you should bear in mind that, unless we request your data directly (for example, through marketing actions, contests, promotions, or any other valid way), your data will belong to the corresponding Social Network, so we recommend that you carefully read its terms of use and privacy policies, as well as make sure to configure your preferences regarding data processing.