

**KOBENZO S.A.U. (“KOBENZO”) Mobile Application (“K-PAYMENT”) Privacy Policy (“Privacy Policy”).**

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**1. IDENTIFICATION OF THE DATA PROCESSOR**

- 1.1** The data provided by the user will be processed by **KOBENZO S.A.U.**, with registered 36 rue Schaeffer, Paris, 75016 FRANCE, and tax identification number FR50838607240 (hereinafter the "Controller"). You may contact the Person Responsible at our e-mail address [contact.kobenzo@gmail.com](mailto:contact.kobenzo@gmail.com)
- 1.2** **KOBENZO S.A.U.** informs him/her that these data shall be processed in accordance with the provisions of Regulation (EU) 2016/679 of 27 April (GDPR).

**2. PURPOSE AND LEGITIMISING BASIS OF THE TREATMENTS**

- 2.1** We process your personal data for the purpose described in section «1. PURPOSE» of these terms and conditions, that is, including, among others:
  - 2.1.1** Managing the user registration of the interested party through the registration form.

The processing of your data is legitimated on the basis of the performance of a contract (article 6.1.b GDPR).
  - 2.1.2** Processing orders, requests, respond to queries or any type of request made by the USER through any of the contact methods available at the CONTROLLER's website.

The processing of your data is legitimated on the basis of our legitimate interest in responding to your orders or requests made through any of the forms and/or contact forms that we make available to you in the APPLICATION (article 6.1.f GDPR).
  - 2.1.3** Conduct market research and statistical analysis.

The processing of your data is legitimated on the basis of our legitimate interest (article 6.1.f GDPR).

- 2.1.4 Send the online newsletter on news, offers, and promotions in our activity.

The processing of your data is legitimated on the basis of your consent given for one or more specific purposes (article 6.1.a GDPR) when you fill in any of the forms and/or contact forms that we make available to you in this APPLICATION and mark the box enabled for this purpose.

- 2.2 Data shall be stored for no longer than is necessary to maintain the purpose of the processing or for as long as legal prescriptions are dictating their custody, and when such purpose is no longer necessary the data shall be erased with appropriate security measures to ensure the anonymization of the data or their destruction.

### 3. OBLIGATION TO PROVIDE DATA

- 3.1 By marking the corresponding boxes and entering data in the fields marked with an asterisk (\*) on the contact form or presented on download forms, the USERS expressly accept, freely and unequivocally, that their data are necessary to attend to their request, on the part of the provider, the inclusion of data in the remaining fields being voluntary. The USER guarantees that the personal data provided to the RESPONSIBLE are true and is responsible for communicating any changes to them.

- 3.2 The DATA PROCESSOR OFFICER informs that all the data requested through the website are compulsory, as they are necessary to provide the USER with an optimum service. In the event that all the data are not provided, it is not guaranteed that the information and services provided will be completely adapted to your needs.

### 4. RECIPIENTS OF YOUR DATA

- 4.1 Your personal data may be disclosed to:

4.1.1 Public Administrations and other private entities in order to comply with the legal obligations to which KOBENZO S.A.U is subject due to its activities.

4.1.2 The suppliers that need access to the user's personal data for the provision of the services that KOBENZO S.A.U has hired them, or that by the very operation of the electronic services (application, website, and e-mails) may have access to certain personal data. KOBENZO S.A.U has signed the contracts of confidentiality and order of personal data processing necessary and required by the regulations to protect their privacy with all of them (article 28.3 GDPR).

4.1.3 The Data Processor has signed agreements with the following service providers:

- i. Amazon Web Services EMEA SARL (AWS).
- ii. Google Analytics, Google Ads
- iii. Changelly: <https://changelly.com/about>
- iv. Claritus consulting: <https://www.claritusconsulting.com/>
- v. RAMP: <https://ramp.network/>

- 4.2 The App may collect, store or compile certain non-personal information regarding its use. Google Analytics is governed by Google's General Terms and Conditions <http://www.google.com/analytics/terms/es.html> and Google's Privacy Policy

<https://www.google.es/intl/es/policies/privacy/>. To deactivate Google Analytics:  
<https://support.google.com/analytics/answer/1009696?hl=es>

## 5. RIGHTS

4.1 Users who provide us with their data have the following rights in relation to their data:

**4.1.1 Right of access:** Any person has the right to obtain confirmation from the responsible person whether or not personal data concerning him or her is being processed and, if so, the right to access the personal data. You can exercise this right by logging into your user account, in the "My Account" section.

**4.1.2 Right to rectification:** This is the right to obtain the rectification of personal data held by us and concerning you. You can exercise this right by logging into your user account, in the "My Account" section.

**4.1.3 Right to erasure:** This is the right to obtain the deletion of your personal data.

You can exercise this right by logging into your user account, in the "My Account" section, and writing to Kobenzo through our website <https://www.kobenzo.co/> or by email: [contact.kobenzo@gmail.com](mailto:contact.kobenzo@gmail.com)

**4.1.4 Right to restrict processing:** This is the right to have your data no longer subject to the corresponding processing operations when one of the following conditions is met:

- a. When you have exercised your rights to rectification or objection and the Data Processor is in the process of determining whether the request is appropriate.
- b. If the data processing is unlawful, which implies the deletion of the data, but you do not wish your data to be deleted by the Data Processor.
- c. If the data are no longer necessary for processing, which implies deletion of the data, but you wish the Data Processor to limit the processing of the data and to keep them in order to be able to formulate, exercise, or defend against claims.

**4.1.5 Right to data portability:** This is the right to obtain from the Data Processor, in case of automatic processing of your data, a copy of these data in a structured format, for common use and mechanical reading, or that this copy is directly transmitted to the Data Processor you indicate. Please note that this right does not apply to:

- a. The data of third parties that you have provided to the person in charge.
- b. Data related to you but provided to the Data Processor by third parties.

**4.1.6 Right to object:** This is the right to object to the processing of your personal data. With regard to the processing carried out by the Data Processor, you may object to the sending of commercial communications both by yourself and by third parties.

To do so, you must log in to your user account, in the "My Account" section, and configure your options.

### 4.2 Contact information for exercising rights:

E-mail: [contact.kobenzo@gmail.com](mailto:contact.kobenzo@gmail.com)

**4.3** If you wish to obtain more information about your rights, we suggest that you visit the EDPB website [https://edpb.europa.eu/guidelines-your-rights-0\\_en](https://edpb.europa.eu/guidelines-your-rights-0_en)

**4.4** In addition, we inform you about the possibility of filing a complaint with the competent Control Authority.

## **6. SECURITY MEASURES**

**5.1** In accordance with the provisions of the current regulations on the protection of personal data, the CONTROLLER is complying with all the provisions of the GDPR for processing the personal data for which they are responsible and is manifestly complying with the principles described in Article 5 of the GDPR, by which they are processed in a lawful, fair and transparent manner in relation to the data subject and appropriate, relevant and limited to what is necessary for relation to the purposes for which they are processed.

**5.2** KOBENZO S.A.U guarantees that all appropriate technical and organizational policies have been implemented to apply the security measures established by GDPR and LOPDGDD to protect the rights and freedoms of the users, and has communicated the appropriate information for them to be able to exercise their rights and freedoms.

**5.3** Any transfer of information that the App makes with cloud servers, either its own or those of third parties, is carried out in an encrypted and secure manner through a secure hypertext transfer protocol (HTTPS), which also guarantees that the information cannot be intercepted.

**5.4** For more information on the guarantees of your privacy, you can contact KOBENZO S.A.U at [contact.kobenzo@gmail.com](mailto:contact.kobenzo@gmail.com).