

PRIVACY POLICY

1. INTRODUCTION

At TRAMITAPP we work to offer you the best possible experience through our products and services. In some cases, it is necessary to collect information to achieve this. We are concerned about your privacy and we believe that we must be transparent about it.

Therefore, and for the purposes of the provisions of REGULATION (EU) 2016/679 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL of 27 April 2016 (hereinafter "**GDPR**") on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and the Law 34/2002, of July 11, 2002, on Information Society Services and Electronic Commerce (hereinafter, "**LSSI**"), **TRAMITAPP SL** informs the user that, as data controller, it will incorporate the personal data provided by users in an automated file.

2. DATA CONTROLLER

TRAMITAPP, S.L. (hereinafter, "**TRAMITAPP**" or the "**Organization**") is the creator of this platform. However, TRAMITAPP acts as the Data Processor of the personal data of the platform users. Below is the general information of the Company:

Identity: TRAMITAPP SL

Address: Calle Diego De León 5. 28006, Madrid

TAX ID: B87620746

Email: gdpr@tramitapp.com

TRAMITAPP has appointed a Data Protection Officer in your organization. If you want to make a query regarding the processing of your personal data, you may contact us via the above-indicated email.

3. PERSONAL DATA COLLECTED AND THEIR PROCESSING

The personal data that we may process on our platform and the legal basis for such data processing are set out below.

REGISTRATION PHASE

- **TRAMITAPP User Registration:** in order to manage the registration of the platform, personal data such as your name and surname, telephone, email and password will be processed. There is the option to register through providers such as Google and Microsoft whose personal data will be processed by them and they will be responsible for them. The personal data processed by the aforementioned providers will be shared with TRAMITAPP so that it can proceed to complete your correct registration on the platform.

PERSONAL AREA SECTION

- **Employee Profile:** To manage the configuration of your TRAMITAPP account, we will process your personal data such as your name, surname, ID number, and email address, as well as other optional personal data.
- **Geolocation:** To manage work attendance, this can be done through geolocation. This functionality is optional, and personal data such as the location of the data subject may be processed for this purpose.
- **Facial recognition:** To manage work attendance, this can be done through facial recognition. This functionality is optional, and for this purpose, personal data such as images and facial expressions may be processed.
- **Payroll management:** In order to manage payroll access, the identification and economic data of the affected workers may be processed to provide storage and historical generation functions.
- **Chat support:** In order to manage your queries made through our chat, it will be necessary to process your personal data such as your IP address and the ID associated with your TRAMITAPP account, as well as any data that you decide to communicate freely through the chat. In the event that one of our Customer Success employees needs to contact you, we will need to process your email address in order to do so.
- **Cookies browsing information:** In case you accept the installation of cookies when browsing our website, we may treat the following personal data such as IP address, and other non-personal data

such as the user of the agent, date and time you have accessed our services, internet browser you use and data on the operating system of the device. This information is further specified in our [Cookie Policy](#).

4. PERSONAL DATA LEGAL BASIS

The legal basis that justifies the processing of your data mentioned above is:

- Consent of the interested party for registration on the platform and/or app, user support in the chat, and the processing of optional cookies accepted by them.
- Fulfillment of legal obligations for fraud prevention, communication with public authorities, third-party claims, and work attendance management.

5. RETENTION PERIOD

We only keep your Personal Data for as long as necessary for the purposes for which they were collected with your express consent, to meet your needs or to comply with our legal obligations.

To determine how long we retain your Personal Data, we use the following criteria:

- Personal Data obtained when you contact us regarding an inquiry or request: for the time necessary to resolve your inquiry.
- Personal Data obtained when you have given us consent for the necessary compliance with regulations and/or legal obligations: until the end of the employment relationship with our Clients (i.e., the Employer).

We may retain some of your Personal Data to comply with our legal or regulatory obligations, as well as to administer our rights (e.g. to file our claims in court) or for statistical or historical purposes.

Once the retention periods for your Personal Data mandated by law have elapsed, TRAMITAPP will proceed to delete them from our systems and records.

For further information, please contact us by e-mail at gdpr@tramitapp.com.

6. RECIPIENTS TO WHOM WE COMMUNICATE YOUR DATA

In certain circumstances, and only when necessary, TRAMITAPP may disclose your data to third parties. However, the data will never be sold to third parties. The external service providers that TRAMITAPP relies on to provide auxiliary services for the processing of your data may have access to your data in accordance with the instructions given by TRAMITAPP and for the sole purpose of properly performing the contractual relationship that exists between TRAMITAPP and its providers. For more information, please contact us by e-mail: gdpr@tramitapp.com

TRAMITAPP seeks to ensure the security of personal data when it is sent outside the Organization and ensures that third party service providers respect confidentiality and have adequate measures in place to protect personal data. These third parties have an obligation to ensure that the information is handled in accordance with data privacy regulations. In order to comply with these safeguards, TRAMITAPP enters into data processor agreements with these providers in accordance with Article 28 of the GDPR.

In some cases, the law may require that personal data be disclosed to public administrations or other parties, only what is strictly necessary for the fulfillment of such legal obligations will be disclosed.

7. CONSERVATION OF YOUR PERSONAL DATA

In general, data is stored within the EU. However, in the event that the processing of your data involves an international transfer of data outside the European Economic Area (EEA) TRAMITAPP undertakes to implement the necessary security measures to ensure an adequate level of safeguarding of such transfers by means of data processor contracts and, where appropriate, will ensure that they offer an adequate level of protection, either because they have Binding Corporate Rules (BCR) or because we have signed up to the European Commission's model clauses. For more information about our service providers, please contact us at gdpr@tramitapp.com.

8. DATA SUBJECT'S RIGHTS

You can address your communications and exercise your rights by sending a request to the following e-mail address gdpr@tramitapp.com

Under the GDPR you can request:

- **Right of information:** you can request information about those personal data we have about you.
- **Right of rectification:** you can communicate any change in your personal data.

- **Right to erasure and to be forgotten:** you can request the prior blocking of the deletion of personal data.
- **Right to limitation of processing:** this is to restrict the processing of your personal data.
- **Right to data portability:** in some cases, you may request a copy of the personal data in a structured, commonly used and machine-readable format for transmission to another data controller.
- **Right to object and automated individual decision-making:** you may request that decisions based solely on automated processing, including profiling, that produce legal effects or significantly affect the data subject not be made.

In some cases, the request may be denied if you request the deletion of data necessary for compliance with legal obligations. Additionally, if you have a complaint about data processing, you can file a complaint with the competent data protection authority (Agencia Española de Protección de Datos or "AEPD").

9. RESPONSIBLE FOR THE ACCURACY AND VERACITY OF THE DATA PROVIDED

The user is solely responsible for the truthfulness and accuracy of the data included, exonerating TRAMITAPP from any liability in this regard. Users guarantee and are responsible, in any case, for the accuracy, validity and authenticity of the personal data provided, and undertake to keep them duly updated. The user undertakes to provide complete and correct information. TRAMITAPP reserves the right to terminate the services contracted with users, in the event that the data provided is false, incomplete, inaccurate or not up to date.

TRAMITAPP is not responsible for the veracity of the information that is not of its own elaboration and of which another source is indicated, so it does not assume any responsibility for hypothetical damages that may arise from the use of such information.

TRAMITAPP reserves the right to update, modify or delete the information contained in its web pages and may even limit or deny access to such information. TRAMITAPP is exonerated from any claims by users affected by these actions.

10. SECURITY MEASURES IMPLEMENTED TO PROTECT YOUR PERSONAL INFORMATION

TRAMITAPP has adopted the legally required levels of security for the protection of personal data, and endeavors to install other additional technical means and measures within its reach to prevent the loss, misuse, alteration, unauthorized access and theft of personal data provided to TRAMITAPP.



TRAMITAPP is not responsible for any hypothetical damages that may arise from interferences, omissions, interruptions, computer viruses, telephone breakdowns or disconnections in the operational functioning of this electronic system, caused by causes beyond TRAMITAPP. This includes delays or blockages in the use of this electronic system caused by deficiencies or overloads in the telephone lines, the Data Processing Center, the Internet system, or other electronic systems, as well as damage that may be caused by third parties through illegal intrusions beyond the control of TRAMITAPP. However, the user must be aware that security measures on the Internet are not infallible.

In particular, the website is secured with a TLS certificate with RSA encryption, which means that all information sent to the website is encrypted with an HTTPS protocol.

11. MODIFICATION OF THE PRIVACY POLICY

This privacy policy may be modified. We recommend that you review the privacy policy regularly.

Last modification date: June 2024