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Poeta Joan Maragall 1, 14th floor 28020, Madrid

taptapdigital.com

# **WEB PRIVACY NOTICE**

In compliance with the regulations on personal data protection and in accordance with Regulation (EU) 2016/679 of the European Parliament and of the Council of April 27, 2016, concerning the protection of individuals with regard to the processing of personal data and the free movement of such data (GDPR), as well as any other related regulations applicable at any given time, TAPTAP DIGITAL, S.L., and its group companies (hereinafter referred to as "TAPTAP") provide you with the necessary information so that you are aware of all relevant aspects regarding the processing of your data.

This privacy notice describes the collection and use of personal data by TAPTAP through its own website but does not apply to the processing of data that may be conducted when using TAPTAP's whistleblowing channel, which is governed by its own privacy policy available here.

You can also access <u>here</u> Sonata's privacy policy to learn how we process your personal data in the event you access the platform.

The processing of data carried out in TAPTAP's offices located outside the European Economic Area will comply with the security standards of the GDPR. Additionally, these offices will comply with the national and/or local data protection regulations that are applicable.

# 1. Who is the data controller responsible for the processing of your data?

Identity: TAPTAP DIGITAL, S.L.

**Tax ID**: B-85914182.

Postal Address: Edificio Eurocentro, C. del Poeta Joan Maragall 1, 14th floor - 28020

Madrid.

Email: privacy@taptapnetworks.com

Data Protection Officer contact: DPO.privacy@taptapdigital.com

#### 2. TCF V2.2 Compliance Statement

TAPTAP Digital S.L. participates in the "IAB Europe Transparency & Consent Framework" as a Vendor with the assigned ID 475. In this regard, TAPTAP informs and ensures that it complies with the policies and specifications of the "Transparency & Consent Framework".

#### 3. When do we collect your personal data?

Your personal data may be collected at the following moments:

- Through the registration form for the "SONATA" platform: TAPTAP owns a geolocation-based advertising platform called "SONATA". The website includes a registration and access form for this platform.
- **Through Cookies**: The website installs cookies that gather information about your browsing. We recommend that you read <a href="here">here</a> the cookie policy for complete information on this matter.

# 4. For what purpose do we process your personal data?

Your personal data may be processed for the following purposes:

- When you register on the "SONATA" platform, we will process your personal information to manage your registration, including subsequent assistance, management, and customer support, as well as payment processing.
- The information will be processed to comply with our legal obligations, potential judicial resolutions, and other decisions determined by authorities. This includes the communication of your personal data to law enforcement agencies, whenever we have suspicions or indications of conduct that may constitute a criminal offense.

## 5. What is the legal basis for the processing of your personal data?

The processing carried out by TAPTAP is based on the following legal basis:

- When your data is processed to register you on the "SONATA" platform and manage it, the processing is based on the execution of a contractual relationship (Article 6.1.b)
   GDPR) by accepting the terms and conditions of the platform.
- When information is processed to comply with current regulations or possible judicial resolutions or other decisions by competent authorities, the processing is based on the fulfilment of our legal obligations (Article 6.1.c) GDPR).

### How long will we retain your personal data?

Your personal data will be processed for the period necessary to fulfil the purposes established in this Privacy Policy, as well as to retain your personal information in compliance with the provisions of relevant laws and regulations, especially concerning legal prescription periods, and for the formulation, exercise, or defence of claims.

The criteria we follow for this are determined by (a) the purpose of the collected data and the fulfilment of that purpose (e.g., if our relationship persists); (b) the reasons for which the

data is collected (e.g., in the case of consent, you may revoke it at any time), and (c) mandatory storage periods according to contractual and regulatory requirements.

Keep in mind that, in some cases, we may retain your data for the period necessary for the formulation, exercise, or defence of claims, requirements, legal and/or contractual responsibilities and obligations, always being duly blocked.

# 7. To whom can your data be disclosed?

Depending on the purposes for which personal information is collected, the following third parties may have access to your personal data:

- Public administrations, organizations, and/or competent authorities, as well as relevant law
  enforcement agencies, in cases where there is a requirement, a legal obligation, or where
  we believe there are sufficient indications and/or suspicions of criminal activity.
- Collaborators and third-party service providers who process information as data processors. With all our providers, the corresponding data processing agreement has been concluded in accordance with data protection regulations. Also, there are certain providers (Amazon Web Services and Oracle-NetSuite) that, when providing their service, may transfer certain personal information to a country outside the European Economic Area, especially the United States (a country that, according to the European Commission, does not offer an adequate level of data protection). Such transfers are made using safeguards permitted by regulations, especially the use of standard contractual clauses approved by the European Commission.

#### 8. What are your rights when you provide us with personal data?

If we process your data, you should know that your rights are:

- Right to request access to personal data: you can inquire whether TAPTAP is processing your data, and if so, access them.
- Right to request rectification if the data is inaccurate or to complete incomplete data.
- Right to request the erasure of your data.
- Right to request the restriction of its processing: in this case, TAPTAP will only keep them for the exercise or defense of claims.
- Right to object to processing: we will stop processing personal data, except if they
  must continue to be processed for legitimate reasons or for the exercise or defense of
  possible claims.

- Right to data portability: if you want your data to be processed by another data controller, we will facilitate the transfer of your data to the new controller, provided it is technically possible.
- Right not to be subject to a decision based solely on automated processing of your personal data.

If you have given us your consent for any specific purpose, you may withdraw it at any time by clicking <a href="here">here</a>. Withdrawing your consent will not affect the lawfulness of processing based on consent prior to its withdrawal.

To exercise your rights, you should contact us by sending an email to <a href="mailto:privacy@taptapnetworks.com">privacy@taptapnetworks.com</a> or in writing to the postal address provided in section 1 of this privacy notice.

If you deem it appropriate, you can contact our Data Protection Officer (DPO) by writing an email to <a href="mailto:DPO.privacy@taptapdigital.com">DPO.privacy@taptapdigital.com</a> and file a complaint with the competent authority, in this case, the Spanish Data Protection Agency (<a href="https://www.aepd.es">https://www.aepd.es</a>).

#### 9. Modifications.

We will only use your personal data as outlined in this document. Should there be any changes to the processing of your data subsequent to the time of collection, you will be informed promptly about it.

#### 10. Additional information.

<u>Policy on Child Use</u>: Our services are exclusively directed to individuals of legal age. In this regard, we do not intentionally collect information from minors. In any case, if you, as parents or legal guardians, believe that minors have provided us with personal data, please contact us by sending an email to <u>privacy@taptapnetworks.com</u>.

<u>Special category of data</u>: TAPTAP does not collect or process personal data that reveals ethnic or racial origin, political opinions, religious or philosophical beliefs, or union membership. Additionally, we do not process genetic data, biometric data intended to uniquely identify an individual, data related to health or sexual life, or sexual orientation.

<u>Links</u>: On TAPTAP's website, there may be links to other websites that we consider potentially useful and informative for you. Please note that the content or services of linked websites are not endorsed by us, and we are not responsible for their privacy practices. We encourage you to read the privacy policies of any website you visit. Remember that what is stated in this privacy notice only applies to the data collected and/or processed by TAPTAP.



<u>Contact Us</u>: If at any time you believe that we have not complied with the provisions established in this privacy notice, please communicate it by sending an email to <u>privacy@taptapnetworks.com</u> or to our DPO at <u>DPO.privacy@taptapdigital.com</u>. If you want to escalate a privacy-related issue or have any questions regarding this privacy notice, do not hesitate to contact us. We will be happy to assist you.

This policy was last updated on the 23th of September, 2025