

## BASIC INFORMATION ABOUT THE PROCESSING OF PERSONAL DATA - ISTOBAL APP

Basic information on data protection	
<b>Person responsible: DPD. contact details</b>	<p>Istobal S.A., place of business L'Alcúdia (VALENCIA), Avda. Conde de Serrallo, 10, Post Code 46250.</p> <p>You may contact the Data Protection Delegate by email <a href="mailto:dpo@istobal.com">dpo@istobal.com</a> or by post to the previous address.</p>
<b>Main purposes and legal basis</b>	<ul style="list-style-type: none"> <li>- Administering user registration in the application and the provision of services through it. The legal basis for using your details is your consent. We understand that, by completing and sending the registration form and providing their data, users give their consent for us to process their data for this purpose.</li> <li>- Sending promotional information by Istobal S.A. about its products and services. The legal basis for using your details is your consent (the relevant box is checked).</li> <li>- Sending of promotional information by companies in the Istobal Group about their products and services. The legal basis for using your details is your consent (the relevant box is checked).</li> <li>- Sending promotional information about the products and services of the companies that run car wash facilities and have joined the APP scheme. The legal basis for using your details is your consent.</li> <li>- <a href="#">Remaining purposes and legitimization</a> (See section <i>Further information</i>)</li> </ul>
<b>Recipients</b>	<ul style="list-style-type: none"> <li>• If you give us your consent, Istobal Group companies in the EU with the purpose of sending promotional information.</li> <li>• If you give us your consent, companies that run car wash facilities other than the Istobal Group, to meet the requests you may make through the APP. If you do not agree to the transfer of your personal data to companies that run car wash facilities, the application will only work with the facilities of Istobal, S.A.</li> <li>• Judges and Courts when there is a legal obligation to disclose your data.</li> <li>• Third-party service providers that have access to your personal data.</li> </ul>
<b>Rights</b>	<p>You are entitled to access, change, and delete your personal data. You may oppose to certain data-processing actions. You may withdraw your consent, limit the use of your personal details, exercise your right to portability and not have your data subjected to decisions solely based on automated data processing.</p> <p>You can exercise the rights described above as follows:</p> <ul style="list-style-type: none"> <li>• In writing, Avda. Conde de Serrallo, 10, Post Code 46250, L'Alcúdia (VALENCIA).</li> <li>• Via email to <a href="mailto:dataprotection@istobal.com">dataprotection@istobal.com</a></li> </ul>

## FURTHER INFORMATION ABOUT THE PROCESSING OF PERSONAL DATA - ISTOBAL APP

Here, we describe how your personal details are processed and the rights you have under current data protection regulations - Regulation (EU) 2016/679 of the European Parliament and the Council of 27 April

2016 on the protection of natural persons with regard to the processing of personal data, and its development regulation, hereinafter referred to as “General Data Protection Regulation” or “GDPR”.

### **1. Person responsible - contact details**

The entity responsible for the processing of your personal data is Istobal SA, with registered office in L'Alcúdia (VALENCIA), Avda. Conde de Serrallo, 10, Post Code 46250. If you wish, you can contact us by email at the following address: [istobal@istobal.com](mailto:istobal@istobal.com)

Additionally, you may contact the Data Protection Delegate by email [dpo@istobal.com](mailto:dpo@istobal.com) or by post to the previous address, sending your letter to the Data Protection Delegate.

### **2. Why do we process your personal data and on what legal basis?**

Your personal data is processed in accordance with the provisions of the GDPR, and on the legal basis and for the purposes described below:

#### **a) Your consent**

If you give us your consent, your data will be processed for the following purposes:

- Registration in the Istobal APP: Istobal S.A. will process the necessary information to enable the user to register with the APP, so that the user can view the different car washes and purchase their services.  
If users want to register via their social media, they should know that they will provide us with their ID details (name, surname and/or ID of the relevant social network).  
We understand that, by completing the registration form and providing the necessary data, the user gives his/her consent to process data for this purpose.
- Sending promotional information -with the user's authorization- through electronic means (newsletter, promotions, blogs, campaigns, etc.) or other means: Provided the user has given his/her consent in the registration form, Istobal S.A. or other companies from the Istobal Group may send promotional information about the products and services of these companies.
- Sending promotional information -with the user's authorization- about the products and services of the companies that run car wash facilities and use the APP.

You may withdraw your consent at any time. Consent withdrawal will not affect the legality of any data processing carried out prior to the withdrawal of your consent.

#### **b) Legitimate interest and legal obligation**

- Computerised control of the APP: Istobal S.A. will take surveillance and control actions to prevent and detect any fraudulent use, unauthorized access, alteration or losses of information of a personal or non-personal nature on the APP.
- Reporting and managing incidences: Istobal SA shall process the necessary user information to manage any incidence reported or any incidence detected by Istobal S.A. In this regard, your personal data will only be used with a view to resolving the incidence and its effects.

This will only be done on the basis of ISTOBAL S.A.'s legitimate interest in ensuring the security of the APP and that of the information, and in fulfilling its legal duties pursuant to the Information Society and Electronic Commerce Services Act.

### **3. Automated individual decisions and profile creation**

Within the framework of the commercial relationship between the parties, automated decisions shall not be made, including profile creation, as laid down by the provisions in Article 22 of the GDPR. Should

individual automated decisions or profile creation be necessary at some point, the parties will be informed separately.

#### **4. Sharing your personal data**

To fulfil all the purposes described above, Istobal S.A. collaborates with service suppliers that may have access to your personal data as a result of the services contracted. Istobal S.A. observes strict criteria in the selection of these third parties in order to comply with its data protection obligations and signs a data protection agreement with them, whereby these third parties undertake to meet their data protection duties and, more particularly, to comply with legal, technical and organizational measures, use personal data for the agreed purposes only and not for other purposes or for assignment to third parties.

Additionally, Istobal S.A. may disclose personal data to:

- Judges and Courts in the exercise of the functions that are legitimately attributed and pursuant to the applicable provisions in those cases in which this might necessary.
- If you give us your consent, data may be disclosed to companies that run car wash facilities other than the Istobal Group, so that your request made on the APP can be dealt with. If you do not agree to the transfer of your personal data to companies that run car wash facilities, the application will only work with the facilities of Istobal, S.A.
- If you give us your consent, to companies that run car wash facilities other than the Istobal Group, with the purpose of sending promotional information about the products and services of these companies.
- If we receive your consent for this, your data may be shared with the companies of the Istobal Group (Istobal Servicios Integrados S.L., Istobal Manufacturing Spain S.L., Istobal España, S.L., Istobal Metal Works, S.L., ISTOBAL SVERIGE AB (Sweden), ISTOBAL DENMARK A/S (Denmark), FDI+ SRL (France), ISTOBAL UK Ltd. (United Kingdom), ISTOBAL COMMERCIAL SERVICES LTD (United Kingdom), ISTOBAL ITALIA S.R.L. (Italy), ISTOBAL HANDELSGES.m.b.H. (Austria) and ISTOBAL PORTUGAL UNIPessoal LDA (Portugal)), all of them in the EU, with the purpose of sending promotional information about the products and services of these companies.

#### **5. How long will we keep your data?**

Istobal S.A. will keep your personal data for the time needed to fulfil the purpose it was collected for, after which it should only be released to Judges and Courts, the Public Prosecutor or the relevant Public Administrations dealing with potential responsibilities arising from its use, and only until any legal liability has expired. Once these deadlines have elapsed, data will be eliminated using secure methods.

#### **6. How did we obtain your personal data?**

Personal data processed by Istobal SA is the personal details collected via the forms on the Istobal APP.

If necessary for a right to be exercised, Istobal S.A. may request information from the car wash facilities where services were provided to you or, where applicable, from any third party that may have received your information.

#### **7. What are your rights when you give us with your data?**

Pursuant to the provisions of the GDPR and the national regulations on data protection, you have the right to change, access or delete your personal data, as well as to limit the use of your personal data, oppose to their use, request their portability and oppose to your data being subject to automated individual decisions.

Additionally, if the use of your personal data is based on your consent, you are entitled to withdraw your consent at any time. Consent withdrawal will not affect the legality of any data processing carried out prior to the withdrawal of your consent.

You may exercise the rights described above as follows, with the necessary documentation for us to be able to confirm your identity (copy of your ID, passport, NIE, etc.):

- In writing, Avda. Conde de Serrallo, 10, Post Code 46250, L'Alcúdia (VALENCIA).
- Via email to [dataprotection@istobal.com](mailto:dataprotection@istobal.com)

**8. How can I file a complaint?**

If you think that your data protection rights have been violated or you have any complaints regarding your personal information, you can contact the Data Protection Delegate (see contact details in section 1).

In any case, you can always file your complaint with the Spanish Agency for Data Protection, which is the control authority for data protection matters, <http://www.agpd.es> ., C / Jorge Juan number 6, 28001, Madrid.