

## **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](#).

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](mailto:privacy@taptapnetworks.com)

**Data Protection Officer contact:** [DPOprivacy@dwf-rcd.law](mailto:DPOprivacy@dwf-rcd.law)

### **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 contact form:** We have a form available on our website for you to get in touch with us, whether to request information about our services or to make inquiries.
- **Through the forms available in the "Join Us" section:** In this specific section of our website, you can explore various job vacancies available at TAPTAP.
- **Through the registration form for the "SONATA" or "TAPTAP DSP" platform:** TAPTAP owns a geolocation-based advertising platform called "SONATA" or "TAPTAP DSP". 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 [here](#) 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:

- Your data will be processed to assist, manage, and address potential requests, comments, and/or inquiries received from users.
- When you register on the "SONATA" or "TAPTAP DSP" 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.
- Whenever we have a lawful basis for it, we will process your data to keep you informed about services, promotions, and products related to our activities through the means you have provided to us (phone, email, SMS, and/or messaging system, among others) that may be of interest to you.
- If you complete the relevant form in the "join us" section and provide us with your resume or provide it outside of an open selection process, the information provided will be processed for the purpose of managing personnel selection, analysing the suitability of your application, and including you as a participant in a selection process for possible hiring by TAPTAP. Also, with your consent, we will process your data to contact your previous employers and confirm the references included in your resume.
- We will process your information to conduct statistical analyses anonymously for the purpose of understanding the functioning of our services, with the aim of improving their development and customization.

## 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 assist, manage, and address potential requests, comments, and/or inquiries, the processing is based on your consent when you submit your inquiry and/or request (Article 6.1.a) GDPR).
- When your data is processed to register you on the “SONATA” or TAPTAP DSP” 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).
- When your data is processed to send you information about our services, the processing is based on your consent (Article 6.1.a) GDPR). In Spain, whenever applicable, it may be carried out based on the legal authorization provided in Article 21.2 of Law 34/2002, of July 11, on services of the information society and electronic commerce.
- When your data is processed for the purpose of personnel selection and to include you as a participant in a selection process, the legal basis for the treatment depends on whether you have applied in a hiring process or if you have submitted your curriculum vitae outside of an open selection procedure. If you have applied to a selection process for a specific position, the legal basis for processing your personal data would be, according to your request, the necessity to take appropriate measures prior to entering into a contract of employment (Article 6.1.b) of the GDPR). If your application is spontaneous and not linked to a specific hiring process, the legal basis for the processing of your personal data is your consent, given by submitting a resume or job application (Article 6.1.a) of the GDPR). Your consent is also the legal basis for contacting your previous employers and confirming the references included in your resume.
- When the information is used to conduct statistical analyses anonymously for the purpose of understanding the functioning of our services, the processing is carried out to satisfy our legitimate interest, which includes managing and improving the aforementioned services (Article 6.1.f) GDPR), always considering that our interest does not override your fundamental interests, rights, and freedoms.

## 6. 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.

When your data is processed for the purpose of staff selection, the retention period of your data will depend on whether you have applied in a specific selection process or if you have submitted your resume outside of an open selection process. If you have applied for a specific position, your data will be retained for the duration of the call and until the position(s) are effectively filled. If your application is spontaneous and not linked to a specific call, your data will be retained for a period of one (1) year from the moment they are registered. After this period, the data will be deleted unless you have updated the data and confirmed your candidacy.

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:

- Payment platforms or financial entities if necessary to carry out or verify payments.
- 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 [here](#). 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 [privacy@taptapnetworks.com](mailto:privacy@taptapnetworks.com) 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 [DPOprivacy@dwf-rcd.law](mailto:DPOprivacy@dwf-rcd.law) and file a complaint with the competent authority, in this case, the Spanish Data Protection Agency (<https://www.aepd.es>).

## 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.

Policy on Child Use: 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 [privacy@taptapnetworks.com](mailto:privacy@taptapnetworks.com).

Special category of data: 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.

Links: 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.

Contact Us: 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 [privacy@taptapnetworks.com](mailto:privacy@taptapnetworks.com) or to our DPO at [DPOprivacy@dwf-rcd.law](mailto:DPOprivacy@dwf-rcd.law). 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 25th of January, 2025.**