

WEBSITE PRIVACY POLICY

www.luolio.io

I. PRIVACY AND DATA PROTECTION POLICY

In compliance with current legislation, Luolio Global Capital (hereinafter also Website) undertakes to adopt the necessary technical and organisational measures, according to the level of security appropriate to the risk of the data collected.

Laws incorporated in this privacy policy

This privacy policy is adapted to current Spanish and European legislation on the protection of personal data on the Internet. Specifically, it respects the following regulations:

- Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data (GDPR).
- Organic Law 3/2018, of 5 December, on the Protection of Personal Data and Guarantee of Digital Rights (LOPD-GDD).
- Royal Decree 1720/2007, of 21 December, approving the Regulation implementing Organic Law 15/1999, of 13 December, on the Protection of Personal Data (RDLOPD).
- Law 34/2002, of 11 July, on Information Society Services and Electronic Commerce (LSSI-CE).

Identity of the person responsible for the processing of the personal data

The person responsible for the processing of personal data collected by Luolio Global Capital is: LUOLIO GLOBAL CAPITAL SL, provided with NIF: B13908702 and registered in: Bizkaia with the following registry details: Luolio Global Capital SL, whose representative is: Luolio Global Capital (hereinafter, Data Controller).

Its contact details are as follows:

Address: Plaza Sagrado Corazón, N°5, 6th floor - Bilbao (Bizkaia)

Contact telephone number: +34 94 602 26 39

Contact email: luolio@luolio.io

Register of Personal Data

In compliance with the provisions of the RGPD and the LOPD-GDD, we inform you that the personal data collected by Luolio Global Capital, through the forms provided on its pages will be incorporated and processed in our file in order to facilitate, expedite and fulfil the commitments established between Luolio Global Capital and the User or to maintain the relationship established in the forms filled in by the User, or to respond to a request or query from the User. Likewise, in accordance with the provisions of the RGPD and the LOPD-GDD, unless the exception provided for in article 30.5 of the RGPD applies, a register of processing activities is kept which specifies, according to its purposes, the processing activities carried out and the other circumstances established in the RGPD.

Principles applicable to the processing of personal data

The processing of the User's personal data shall be subject to the following principles set out in Article 5 of the GDPR and in Article 4 et seq. of Organic Law 3/2018 of 5 December on the Protection of Personal Data and the Guarantee of Digital Rights:

- Principle of lawfulness, fairness and transparency: the consent of the User shall be required at all times following fully transparent information on the purposes for which the personal data is collected.

Principle of purpose limitation: personal data shall be collected for specified, explicit and legitimate purposes.

- Data minimisation principle: the personal data collected shall be only that which is strictly necessary in relation to the purposes for which they are processed.

- Accuracy principle: personal data must be accurate and always up to date.

- Retention limitation principle: personal data shall only be kept in a form that allows the identification of the User for the time necessary for the purposes of their processing.

Principle of integrity and confidentiality: personal data shall be processed in such a way as to ensure their security and confidentiality.

- Principle of proactive responsibility: the Controller shall be responsible for ensuring that the above principles are complied with.

Categories of personal data

The categories of data processed by Luolio Global Capital are only identifying data. Under no circumstances are special categories of personal data processed within the meaning of Article 9 of the GDPR.

Legal basis for the processing of personal data

The legal basis for the processing of personal data is consent. Luolio Global Capital undertakes to obtain the express and verifiable consent of the User for the processing of his or her personal data for one or more specific purposes.

The User shall have the right to withdraw his/her consent at any time. It will be as easy to withdraw consent as it is to give it. As a general rule, withdrawal of consent shall not condition the use of the Website.

On those occasions when the User must or may provide their data through forms to make enquiries, request information or for reasons related to the content of the Website, they will be informed in the event that the completion of any of them is compulsory because they are essential for the correct development of the operation carried out.

Purposes of the processing for which the personal data is used

The personal data is collected and managed by Luolio Global Capital in order to facilitate, speed up and fulfil the commitments established between the Website and the User or to maintain the relationship established in the forms filled in by the User or to attend to a request or query.

Likewise, the data may be used for commercial, personalisation, operational and statistical purposes, and for activities related to Luolio Global Capital's corporate purpose, as well as for data extraction, storage and marketing studies to adapt the Content offered to the User, and to improve the quality, operation and browsing of the Website.

At the time the personal data is obtained, the User will be informed of the specific purpose or purposes of the processing for which the personal data will be used, i.e. the use or uses to which the information collected will be put.

Retention periods of personal data

Personal data will only be retained for the minimum time necessary for the purposes of their processing and, in any case, only for the following period: 12 months, or until the User requests their deletion.

At the time the personal data is obtained, the User will be informed of the period for which the personal data will be retained or, where this is not possible, the criteria used to determine this period.

Recipients of personal data

The User's personal data will be shared with the following recipients or categories of recipients:

Google Fonts; WordPress (self-hosted); Google Analytics 4; Google Analytics (Universal Analytics); Google Analytics Advertising Reporting Features; Google Analytics Demographic and Interest Reporting; Google Analytics (Universal Analytics) with anonymised IP address.

In the event that the Controller intends to transfer personal data to a third country or international organisation, the User will be informed at the time the personal data is obtained about the third country or international organisation to which the data is intended to be transferred and the existence or absence of an adequacy decision by the Commission.

Personal data of minors

In compliance with the provisions of Articles 8 of the GDPR and 7 of Organic Law 3/2018 of 5 December on the Protection of Personal Data and the guarantee of digital rights, only persons over the age of 14 may give their consent to the processing of their personal data in a lawful manner by Luolio Global Capital. In the case of a child under 14 years of age, the consent of the parents or guardians is required for the processing, and the processing is only lawful to the extent that the parents or guardians have given their consent.

Secrecy and security of personal data

Luolio Global Capital undertakes to adopt the necessary technical and organisational measures, according to the level of security appropriate to the risk of the data collected, so as to ensure the security of personal data and to prevent the accidental or unlawful destruction, loss or alteration of personal data transmitted, stored or otherwise processed, or the unauthorised communication of or access to such data.

However, because Luolio Global Capital cannot guarantee the impregnability of the Internet or the total absence of hackers or others fraudulently gaining access to personal data, the Data Controller undertakes to notify the User without undue delay when a breach of security of personal data occurs that is likely to result in a

high risk to the rights and freedoms of natural persons. In accordance with Article 4 of the GDPR, a breach of security of personal data means any breach of security that results in the accidental destruction, loss or alteration of personal data, or in the accidental or deliberate loss or alteration of personal data, or in the accidental or deliberate destruction, loss or alteration of personal data.

Rights deriving from the processing of personal data

The User has over Luolio Global Capital and may, therefore, exercise the following rights recognised in the RGPD and Organic Law 3/2018, of 5 December, on the Protection of Personal Data and the guarantee of digital rights against the Data Controller:

- Right of access: this is the User's right to obtain confirmation as to whether or not Luolio Global Capital is processing their personal data and, if so, to obtain information about their specific personal data and the processing that Luolio Global Capital has carried out or is carrying out, as well as, among other things, the information available about the origin of said data and the recipients of the communications made or planned for said data.
- Right of rectification: This is the User's right to have his/her personal data that proves to be inaccurate or, taking into account the purposes of the processing, incomplete, modified.
- Right of erasure ("the right to be forgotten"): This is the User's right, unless otherwise provided for by applicable law, to obtain the erasure of his or her personal data when it is no longer necessary for the purposes for which it was collected or processed; the User has withdrawn his or her consent to the processing and the processing has no other legal basis; the User objects to the processing and there is no other legitimate reason to continue the processing; the personal data have been processed unlawfully; the personal data must be erased in compliance with a legal obligation; or the personal data have been obtained as a result of a direct offer of information society services to a child under 14 years of age. In addition to erasure, the Controller shall, taking into account the technology available and the cost of its implementation, take reasonable steps to inform controllers who are processing the personal data of the data subject's request for erasure of any link to those personal data.
- Right to restriction of processing: This is the User's right to restrict the processing of his or her personal data. The User has the right to obtain the restriction of processing where the User contests the accuracy of his or her personal data; the processing is unlawful; the Controller no longer needs the personal data, but the User needs it to make claims; and where the User has objected to the processing.

- Right to data portability: Where processing is carried out by automated means, the User shall have the right to receive from the Controller his or her personal data in a structured, commonly used and machine-readable format and to transmit it to another controller. Where technically feasible, the Controller shall transmit the data directly to that other controller.

- Right to object: This is the User's right not to have his or her personal data processed or to cease the processing of such data by Luolio Global Capital.

- Right not to be subject to a decision based solely on automated processing, including profiling: This is the User's right not to be subject to an individualised decision based solely on automated processing of his or her personal data, including profiling, unless otherwise established by law.

Therefore, the User may exercise his/her rights by means of a written communication addressed to the Data Controller with the reference "RGPD-www.luolio.io", specifying:

- Name, surname(s) of the User and a copy of the User's National Identity Document. In cases where representation is permitted, it will also be necessary to identify by the same means the person representing the User, as well as the document accrediting the representation. The photocopy of the DNI may be substituted by any other legally valid means that accredits identity.

- Request with the specific reasons for the request or information to which access is sought.

- Address for notification purposes.

- Date and signature of the applicant.

- Any document that accredits the request being made.

This request and any other attached documents may be sent to the following address and/or e-mail address:

Postal address: Plaza Sagrado Corazón, Nº5, 6th floor - Bilbao (Bizkaia)

E-mail: luolio@luolio.io

Links to third party websites

The Website may include hyperlinks or links that allow access to websites of third parties other than Luolio Global Capital, and which are therefore not operated by Luolio Global Capital. The owners of such websites will have their own data protection policies, being themselves, in each case, responsible for their own files and their own privacy practices.

Complaints to the supervisory authority

In the event that the User considers that there is a problem or infringement of the regulations in force in the way in which his/her personal data are being processed, he/she will have the right to effective judicial protection and to lodge a complaint with a supervisory authority, in particular, in the State in which he/she has his/her habitual residence, place of work or place of the alleged infringement. In the case of Spain, the supervisory authority is the Spanish Data Protection Agency (<http://www.agpd.es>).

II. ACCEPTANCE AND CHANGES TO THIS PRIVACY POLICY

It is necessary that the User has read and agrees with the conditions on the protection of personal data contained in this Privacy Policy, as well as that he/she accepts the processing of his/her personal data so that the Data Controller can proceed in the manner, during the periods and for the purposes indicated. Use of the Website implies acceptance of the Website's Privacy Policy.

Luolio Global Capital reserves the right to modify its Privacy Policy, according to its own criteria, or motivated by a legislative, jurisprudential or doctrinal change of the Spanish Data Protection Agency. Changes or updates to this Privacy Policy will not be explicitly notified to the User. The User is recommended to consult this page periodically to keep abreast of the latest changes or updates.

This Privacy Policy was updated to adapt to Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data (RGPD) and to Organic Law 3/2018 of 5 December on the Protection of Personal Data and guarantee of digital rights.