SALTO Systems

Informativa sulla privacy SALTO Systems

1. WHO IS THE CONTROLLER OF YOUR PERSONAL DATA?

We inform you that the personal data that you provide us through the Websites will be processed by Salto Systems, S.L. ("Salto") with registered address at C/ Arkotz 9 Pol. Lanbarren 20180 Oiartzun (Gipuzkoa) - Spain, for the purposes described below.

For some specific processing activities, your personal data may be processed by Salto' group entities (the " Group entities"). When that is the case, it will be informed in section 3 of this privacy policy. The Group entity acting as controller of your data depends on where you are located. You may consult the complete list in the following link

You can contact Salto's Data Protection Officer (DPO) as well as, if any, Group entities' DPO, through the contact form "*Contact our Data Protection Officer*".

2. WHICH PERSONAL DATA DO WE PROCESS?

Salto will process the personal data that you may provide through the websites that Salto or any of its Group entities owns or makes available (the "Websites"), depending on the use you are making of any of these Websites. In this respect, you are informed that, in order to carry out certain actions or use certain services of the Websites, you will be asked for personal data. The boxes indicated with an asterisk (*) are strictly necessary to perform the requested actions and/or to provide you with the services offered through the Websites. Failure to provide such necessary information will entail the impossibility of performing the correspondent action or providing the aforementioned services.

This policy will also apply if you have provided your data to us through any other means and you have been referenced to this policy for getting the relevant information about the processing of your data.

You confirm and guarantee the veracity and accuracy of the data provided, and that these are adjusted to your current circumstances. In this sense, you agree to communicate any changes that may occur in them, in accordance with the procedure established in section 7. *"What rights do you have when you provide us with personal data?"* , reserving Salto the right to exclude from the registered services any user who has provided false data, without prejudice to other actions that proceed in Law.

3. WHY AND FOR WHAT WILL WE PROCESS YOUR PERSONAL DATA?

You will now be informed about the purposes of the processing that Salto will carry out on your personal data and the legal basis of said processing activities, depending on the specific Website and section where you have provided the information.

3.1. When you contact us through a contact form:

Websites contain several contact forms where you can contact us to let us know about your queries and requests about Salto, our products and services, our participation on events and any other Salto related aspects in which you might be interested; as well as for issuing requests to downloading the documents that you have personalized through the Websites.

The processing of the personal data that you provide through this contact forms is processed by Salto and, if appropriate, its

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Group entities based on its legitimate interest of contacting you back for answering your query or request.

If your request should be answered by one of our authorized local products and services distributor or by one of our commercial or technology partners, Salto may communicate this data to Salto's partners corresponding to the geographical area where you are located ("Salto Partners") based on its legitimate interest, in order to guarantee a proper and efficient answer to your question or request.

In addition, provided that you give us your consent through any of the checkboxes available in the contact forms of the Websites, we will use your identification data, your profession and the company you work for, as well as your contact details to keep you informed, by any means, including electronic means, about the products and services commercialized by Salto that could be of your interest, and/or to communicate your data, to our Group entities to keep you equally informed. You may revoke this consent at any point by the procedure established in section 7 of this Privacy Policy.

3.2. When you contact us for recruitment:

In case you are interested in joining the Salto team, you shall give us your consent through the corresponding forms so that we process your application for recruitment purposes. We will use your identification data, contact details, languages you speak as well as any other data included in your CV to manage your possible participation in the current selection processes, as well as to keep you informed of the possible selection processes in which you could fit in the future and manage your participation in the same.

Salto will share this information with its Group entities that you indicate as of your interest in the form, with the purpose of considering your application for recruitment processes. Salto will not share your information with other Group entities unless prior consent on your side.

3.3. When you subscribe to our newsletters:

Based on your consent provided through the subscription form, Salto and/or the corresponding Group entities will use your identification data and contact details for sending the newsletters and/or alerts that you have subscribed in relation to the products and services commercialized by Salto and our Group entities, as well as to keep you informed about interesting related news.

3.4. When we send you commercial communications as our client's or prospect's contact person.

As the contact person or representative of one of our clients, Salto may send you commercial communications relating to our products and services. We will do this based on our legitimate interest of promoting our products and services to favor our commercial activity, as well as to offer new products and services or improve the conditions of those you have already contracted.

In the event that you are a contact person of a prospect or an otherwise contact of interest, Salto may process your identification and contact details in order to send you commercial communications in relation with our products and services, provided that you have consented to receiving such communications. You may revoke this consent at any point by the procedure established in section 7 of this Privacy Policy.

3.5. When you are a contact person of a client or supplier

Salto will process your identification and contact details as contact person, employee or representative of our client or

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supplier in order to enable the development, fulfilment and control of the agreed contractual relationship with our client or supplier. Where your company contracted the services of one of the Group entities or Salto Partners, Salto will communicate the required data to this Group entity or Salto Partner, who will also process it.

3.6. When you are a registered user of our Websites:

Websites also offer certain online services in which you will have to previously register in order to get access and use the available services; such as, the Partner Portal and Software Area. In these cases, Salto will process your data to manage your registration to the corresponding website as well as to provide the products and services that are linked to your account, including communicating information in relation to them. Note that given that some of these online services are fee-based services or restricted access services, so not all Website users will be able to get access to such services.

Salto may communicate this data to the Group entities corresponding to the geographical area where you are located with the aforementioned purposes, in order to guarantee the provision of services according to the criteria established by Salto and to ensure certain standards and quality of the contracted services, depending on the place where you reside.

The processing of your account data will be based on:

- Contractual or pre-contractual relationship: When you have an existing relationship with Salto or its Group entities as client, integrator, commercial partner or installer of our products and/or services. This will include any contact we may have with you in relation with this existing relation.
- Legitimate interest: When we use the data to maintain, develop and improve our products and services, as well as to control compliance with our Intellectual Property rights, and when we communicate with you to keep you informed about our products and/or services that could be of your interest.

3.7. Legal compliance purposes

In addition to the aforementioned specific purposes, Salto may also process your personal data, if it is required to comply with our legal obligations (such as, complying with legally determined minimum data retention periods) as well as to communicate the data to public authorities, regulators or governmental bodies in those cases in which it is necessary to do so by law, local regulations or compliance with regulatory obligations.

5. WILL WE CARRY OUT INTERNATIONAL TRANSFERS OF YOUR PERSONAL DATA?

The aforementioned recipients can be located, in some particular cases, outside the European Economic Area (EEA). In those cases, Salto requires that said recipients comply with the measures designed to protect the personal data established in a binding contract, such as the standard contractual clauses, except in cases where the European Commission has determined that the country where the recipient is located provides an adequate level of personal data protection. You may obtain a copy of Salto's required measures by contacting Salto at the address listed at the end of this policy.

6. HOW LONG WILL WE KEEP YOUR PERSONAL DATA?

We keep your personal information for no longer than necessary for the purposes for which it is processed. Therefore, the data storage periods depend on the purposes for which we collect it and use it and/or as required to comply with applicable laws as set out in our data retention policy.

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In all the cases specified below, once these deadlines have passed, we will proceed to the suppression of your personal data at the time in which all the necessary actions have been carried out to manage and terminate any obligation that may remain between the parties, carrying out in such period, all the necessary administrative procedures.

Notwithstanding the foregoing, your data may be kept properly blocked, as long as responsibilities for the execution of our relationship with you can be derived, as well as for compliance with other legal obligations.

In this regard, Salto guarantees that it will not process the data unless it is necessary for the formulation, exercise or defence of claims or when it is required by the Public Administration, Judges and Courts during the period of prescription of their rights or legal obligations.

Depending on the grounds for processing such data, we can distinguish the following general retention periods:

6.1. When you contact us through a contact form:

Your personal data given through a contact form will be stored for the time strictly necessary to attend and process your inquiry.

In any case, if you have given your consent for receiving commercial communications from Salto and/or our Group entities, your data will be kept until you express you want to unsubscribe and to stop receiving these communications.

6.2. When you contact us for recruitment:

Your personal data may be kept for a maximum period of 3 years, or sooner if you communicate your desire to withdraw consent for the processing. However, if the applicable law in certain jurisdiction determines a shorter retention period than the one indicated, we will apply the corresponding statutory period. Once the applicable period has elapsed without you having become part of our team, we will destroy your personal data (including, your CV); unless we ask for your express consent to keep your data for upcoming processes.

6.3. When subscribe to our newsletters:

Your personal data shall be processed until you notify us your decision of unsubscribing to such newsletters or your desire to stop receiving communications.

6.4. When we send you commercial communications as our client's or prospect's contact person.

Salto will carry out the processing of the personal data of the people of contact of our clients for this purpose for as long as the relation with the client remains in force.

In the event that you are a contact person of a prospect or an otherwise contact of interest, we will keep your personal data for the purpose of sending commercial communications until you notify us your decision of unsubscribing to such communications or your desire to stop receiving them.

6.5. When you are a contact person of a client or supplier

Your personal data will be kept for as long as the contractual relationship is in force.

6.6. When you are a user of our online services:

Your data will be processed as long as you keep being a registered user of any of our online services, unless you delete your

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account, or the contractual relationship that you maintain with Salto or our Group entities is terminated by any reason; unless Salto must retain such data for a longer period to comply with legally determined data retention obligations. In certain circumstances, Salto may be entitled to remove your access to the online services. Moreover, if you do not access a Website to which you are a registered user for a certain period, Salto may deactivate your account after giving notice.

7. WHAT RIGHTS DO YOU HAVE WHEN YOU PROVIDE US WITH PERSONAL DATA? WHERE CAN YOU SUBMIT A CLAIM?

We inform you that in accordance with current legislation you can exercise your rights of access, rectification, erasure, restriction, objection, data portability and not to be subject to a decision based solely on automated processing, proving your identity (by means of a copy of ID or equivalent), through the contact form "*Contact our Data Protection Officer*" available herein. If we are not able to identify you as a user, we may ask for additional information to this regard.

Equally, you have the right to withdraw your consent for the processing based on your consent (i.e. processing 3.2, 3.3 and 3.4) at any time by writing an email to the mentioned email address. However, the withdrawal of consent shall not affect the lawfulness of processing based on consent before its withdrawal.

If you believe that SALTO or any of its Group entities has not respected any of the aforementioned rights, you will have the right to submit a claim to the competent Control Authority.

Disclaimer:

This is a downloadable version of the website content that we make available to you for informative purposes for an easier consultation and filling. However, SALTO assumes no responsibility for any errors or typos that the downloadable version may contain.

As SALTO reserves the right to modify this content from time to time, please check on the Legal section of our website to find the latest version of the legal documents and their updates.

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