

# PRIVACY POLICY

Please read this Privacy Policy ("**Policy**") carefully for the website and applications provided by NDD Print Europa, which is described here. From the moment you access the NDD Print Europa website or any of the applications made available by it, regardless of registration or identification as a specific user, you agree and accept all the terms and clauses contained in this Policy. **If you disagree with any provision outlined in this Policy, you must not use the website or applications provided by NDD Print Europa.**

The main objective of this Policy is to demonstrate the ways that **NDD PRINT EUROPA SL.**, C.I.F. B86812468, based in Calle Valportillo Primero 5, Piso 2<sup>a</sup>4, Alcobendas, 28.108, Madrid, Spain (from now on referred as NDD EUROPA), treats and uses your Personal Data that has been provided spontaneously by you, the user ("**You**" or "**User**") or automatically collected by the NDD EUROPA website or applications when accessed.

Always concerned about people, NDD EUROPA dedicates the highest efforts to guarantee, for everyone, the full exercise of their rights, especially their rights of personality. Therefore, the privacy and protection of personal data are at the heart of NDD EUROPA's concerns. Therefore, this Privacy Policy seeks to demonstrate how NDD Print Europa positions itself concerning the use of your Personal Data and what and how you may exercise rights and duties. The instructions described below refer to all products, applications, and services provided by NDD EUROPA.

## 1. ABOUT THIS PRIVACY POLICY

This Policy is permanently available for access and reading on the website and applications provided by NDD EUROPA and can be accessed by the following [link](#).

The Terms and Conditions of Use of the website or application of NDD EUROPA being used by you complements this Policy. Therefore, this Policy must be read and interpreted in conjunction with these documents, which are also permanently available and can be accessed by this [link](#).

This Policy is continually evolving and may be changed without prior notice. For this reason, it is vital that You periodically revisit this page to check if there has been any change in the terms established. To determine if there have been any changes since your last reading, analyze the document's latest version date, located at the end of the page. If we have changed any of the clauses of this Policy and You do not agree with the terms, you must immediately stop using the website and applications provided by NDD EUROPA.

It is possible that some users, due to the professional activity or package contracted within the NDD EUROPA applications, have access to some specific features and services, not available to conventional users of the application. For these cases, there may be Terms of Use, service contracts, and specific Policies. Therefore, in case of conflicts between the provisions of the

Terms and Conditions of Use and the general Privacy Policy and particular documents intended for special types of users, the requirements of the specific materials will always prevail.

Also, considering the mentioned specificities, some words, and expressions defined here and in the Terms and Conditions of Use of the application must be interpreted according to specific definitions that can be accessed from this [link](#).

## **2. ABOUT YOUR ACCEPTANCE OF THE PRIVACY POLICY**

Using the website and applications provided by NDD EUROPA, You declare that you have read and understood all the rules, conditions, and obligations set out in this Privacy Policy. From this use, you also express your **free, explicit, and informed consent** regarding all the provisions described in this Privacy Policy.

## **3. HOW THE COLLECTION OF PERSONAL DATA WORKS**

The website and applications made available by NDD EUROPA collect data that can be directly provided by you, such as registration data, printing data, among others. Also, the data can be automatically collected from your interaction with products, software sites, and applications, including data, eventually from third parties or through the use of cookies.

The website uses cookies so NDD EUROPA can store and respect your configuration preferences, including your privacy, to facilitate your login, prevent your account from being defrauded, and improve the performance of the products and services offered, among others.

It is important that You understand that some methods of collecting information such as cookies can be disabled on your terminal. However, it is noteworthy that, **if these mechanisms are deactivated, part of the website and application features provided by NDD EUROPA may be limited.**

If you choose not to provide the necessary data for the provision of a product or resource, you will not be able to use it. Finally, if Personal Data is related to an existing product You are already using, we may suspend or cancel it.

When you have a choice about whether or not to provide Personal Data, and You choose not to give out that information, some features that use that data, such as customization, will not work for You.

**The acceptance of this Privacy Policy implies, obligatorily, You are aware and accept the collection of data through the website and the applications made available by NDD EUROPA.**

## **4. HOW NDD EUROPE USES AND TREATS PERSONAL DATA**

It is important to note that the security and confidentiality of the Personal Data of Users made available to NDD EUROPA are something that the company always values and, because of this, directs all necessary efforts to ensure that they are guaranteed.

The use of the data and its consequent availability are performed only in circumstances that meet the Users' legitimate expectations, to the minimum extent necessary to perform a specific activity and only in the activities explicitly provided for in the Terms and Conditions of Use and the Privacy Policy.

That means the Personal Data will enable the provision of services provided by the website and applications provided by NDD EUROPA, as well as for its development and to improve the user's browsing experience.

Therefore, the data can be used to improve your interaction with the platforms provided by NDD EUROPA, as well as your user experience, when developing personalized products and giving specific recommendations. They will also be used to carry out updates, improve your security, and develop solutions and new products.

Finally, and as an offshoot of the products and services offered by NDD EUROPA, the data will be used by it to operate its own business, mainly running performance analysis and compliance with legal obligations.

If You are using one of the applications made available by NDD EUROPA through access provided by an organization to which a professional relationship links you, whether it be employment, service, representation or any other professional relationship, it is crucial to understand that:

- (a) the organization to which You are related is the one who effectively controls and administers your instance of the application(s) to which You access, which includes privacy settings;
- (b) the organization can access and process your Personal Data, including access data such as logs and user behavior within the website or applications;
- (c) NDD EUROPA, classified as an Operator in the Treatment of Personal Data of the company to which You are linked to (personal data controller - "Controller"), makes raw data available to the company to which You are related. These data are made available in the format in which they are stored in the application's databases. The organization can import them and treat them in other systems, at the discretion of the organization with which you are associated;
- (d) the organization to which You are associated, in its sole discretion and at any time, respecting the protection rights of personal data born from the relationship between you and the organization (Parent Company), may block or delete your account, including the possibility of data deletion.

## **5. ABOUT THE SHARING OF PERSONAL DATA WITH THIRD PARTIES**

From the applications made available by NDD EUROPA, in which Personal Data Processing activities are carried out, it is essential to highlight the NDD EUROPA, which is mainly characterized as a Personal Data Operator ("Operator"). Being considered an Operator means that NDD EUROPA performs the Personal Data Processing Activities on behalf and order of one or more Controller (s). These may be the NDD EUROPA Client company with which You may have a professional, occasional or recurring relationship and, eventually, the Partner company responsible for providing and maintaining the Client company's printing equipment environment. Finally, You may also be directly linked to a Partner company. In this case, You declare that you understand and accept that the Partner company, to which you are related, positions itself as the actual Controller of your Personal Data.

For this reason, Personal Data can be shared between the companies that occupy the position of Controller and Operator (NDD EUROPA). Any requests for clarification on these shares should be requested directly to the Personal Data Controller to which You are related.

Also, Personal Data may be shared as a result of the contract established between a Controller and NDD EUROPA and in cases where there is a legal obligation.

**Given the above, You declare that you ARE AWARE and AGREE that NDD EUROPA does not have any direct control. It does not assume any responsibility, of any nature, regarding the use of your Personal Data by the Client by the NDD EUROPA Partner. These organizations being the real Controllers of Personal Data Handled by the instances of NDD EUROPA applications that You use.**

## **6. PERSONAL DATA STORAGE**

The storage of Personal Data collected by NDD EUROPA occurs on our cloud servers or contracted from third parties, located in the European Union. It is noteworthy that both these servers and NDD EUROPA itself use all reasonable efforts in the market to preserve data security.

However, given the Internet nature and its constant mutational characteristic, there is no way for NDD EUROPA to guarantee Users the total data security and confidentiality since there is a possibility inherent in all information systems of an external and malicious invasion. Once again, it is reiterated that all necessary and reasonable efforts are observed continuously by NDD EUROPA and by the servers that deal with it.

## **7. HOW TO EXERCISE YOUR RIGHTS AND REQUEST EXCLUSION OF PERSONAL DATA**

According to current legislation, it is possible, at any time, You assert all your rights arising from the Protection of Personal Data concerning Personal Data held by NDD EUROPA. For this, the request can be made directly to the organization to which You are related, this being the actual Controller of the personal data used by the NDD EUROPA applications.

From the use of the NDD EUROPA website and applications and the consequent acceptance of this Privacy Policy and the Specific Terms of Use for each platform, You declare that you are aware and agree that, in case of a request for deletion of Personal Data, directly made by the organization to which You are related, this being the actual Controller of the personal data used by the NDD EUROPA applications, your personal data will be deleted, they will no longer be able to be accessed or recovered, characterizing the permanent loss of this data.

As for the exercise of rights related to your personal data, the treatment of which results from the use of applications made available by NDD EUROPA, you must exercise them directly with the organization to which you are related, this being the actual Controller of personal data.

It is also important to note that, at times, the exercise of the rights and freedoms of Personal Data Holders may be limited due to the need to comply with the contract or, still, to comply with a legal obligation.

## **8. COMMUNICATION CHANNEL**

In case of questions regarding this Privacy Policy or the Terms and Conditions of Use, you should contact us exclusively by [protecaodedados@ndd.tech](mailto:protecaodedados@ndd.tech).

## **9. APPLICABLE LEGISLATION**

All the terms, conditions, obligations, and all other statements in this Privacy Policy shall be governed by the current legislation in the European Union and in particular by law in Spain.

## **10. JURISDICTION OF CHOICE**

You are aware and agree with SPECIFICATION OF MADRID AS A JURISDICTION, IN THE FORMAT DEFINED IN SPANISH LEGISLATION, so that it has jurisdiction over any litigation that may occur related to this Privacy Policy.

Updated: January 03, 2021.