

# THIS IS OUR PRIVACY POLICY

**At BoroPuff, our users are our most valuable asset, and with you, your data. That is why we take advantage of this declaration of intent to guarantee you responsible, fair and lawful use of your data.**

Visiting this website does not imply that the user is obliged to provide any information. In the event that the user provides any personal information, the data collected on this website will be treated fairly and lawfully, subject at all times to the principles and rights set out in Regulation (EU) 2016/679 of 27 April, General Data Protection Regulation (GDPR) and other applicable regulations. In compliance with the provisions of article 13 of the GDPR, we inform you of the following:

## 1. WHO IS THE CONTROLLER OF YOUR DATA?

Boro33 S.L (hereinafter 'BoroPuff'). Palavea Bloque 13 vivienda 377, 15009 A Coruña. 2.

## 2. WHAT DATA DO WE USE AND FOR WHAT PURPOSE?

### USED DATA :

Depending on the purpose for which we process your data from time to time, as explained below, we need to process one or other data, which will in general be, **depending on each case**, as follows:

- Your **identity data** (for example, your name, surname, image, language and country from which you interact with us, contact data, etc.);
- **Economic and transactions** information (for example, your payment or card data, information on your purchases, orders, returns, etc.);
- **Connection, geolocation and/or browsing** data (for example, the location data, the device identification number or the advertising ID, etc.);
- **Commercial** information (for example, if you have subscribed to our newsletter), information about your **tastes and preferences**.

Remember that, when we ask you to fill in your personal data to give you access to any functionality or service of the Platform, we will mark certain fields as *compulsory*, since this is information that we need to be able to provide the service or give you access to the functionality in question. Please take into account that, if you decide not to make such data available to us, you may be unable to complete your user registration or may not be able to enjoy those services or functionalities.

### PURPOSE :

In specific cases, a third party may have provided us with information about you by using a feature or service on the Platform, for example by shipping an order to your address. In these cases, we only process your data where relevant to this feature or service, as stated in this Privacy Policy.

In other cases, we may collect information passively, as we may use tracking tools like browser cookies and other similar technology on our Platform and in communications we send you.

Depending on how you interact with our Platform, i.e., depending on the services, products or functionalities that you wish to enjoy, we will process your personal data for the following purposes:

## 1. To manage your registration as user of the Platform

If you decide to become a registered user of our Platform, we need to process your data to **identify you as a user** of the Platform and **grant you access** to its various functionalities, products and services available to you as a registered user. You may cancel your registered user account by contacting us through Customer Support.

We hereby inform you that the data we gather regarding your activity, which have been collected through the different channels of the Platform and which include your purchases, shall remain linked to your account so that all the information can be accessed together.

You have the possibility to use the login or sign in through a social network or another collaborator that enables this service (social login) when it is available on our login/sign in screen, either to link the social login to your account or by registering a new one. In that case, your login credentials, as well as your name and email / phone number (you might need to authorize it), will be imported from your social network or collaborator account. By using this login option, these third parties may send us certain additional information about your public profile, such as: your name, gender, approximate age or profile photograph, according to the terms of use from the social network / collaborator, which we recommend you read carefully. Unless you give us your authorization, we will not retain this additional data. Likewise, the use of this functionality may imply that you provide certain information about your activity to the social network or the collaborator. In any case, we recommend that you review your privacy settings and the privacy policies of the collaborator or social network to learn how these third parties process your data.

## 2. For the development, performance and execution of the purchase or services contract that you executed with Us on the Platform

This purpose includes processing your data, mainly:

- **To contact you** for updates or informative notices **related to the contracted functionalities, products or services**, including **quality surveys** and to be able to establish the degree of customer satisfaction with the provided service;
- To unauthorised uses of the Platform (for example, during the purchase and returns process) as well as potential fraud being committed against you and/or against us. If we consider that the transaction may be fraudulent or we detect abnormal behaviour which indicates attempted fraudulent use of our features, products or services, this processing may result in consequences such as the blocking of the transaction or the deletion of your user account.
- To manage potential exchanges or **returns** after you have purchased and manage **requests of availability information for articles, reservations of products through the Platform**, or provide you the services related to the functionality **Personal Tailoring**, depending on the availability of such options from time to time.
- For invoicing purposes and to make available to you the invoices of the purchases you have made through the Platform.
- To ensure that you are able to use **other available functionalities or services**, such as the purchase, receipt, management and use of activate the mechanisms necessary to prevent and detect

### 3. To meet requests or applications that you make through the **Customer Support** channels.

We only process the personal data that are **strictly necessary** to manage or resolve your request or application.

If it is available and you choose to communicate with Customer Support through the chat service of a social network or another collaborator, some of your personal data such as your name or user name, will be imported from your social network or collaborator account. Also, bear in mind that the data you submit on this service will be available to your social network or collaborator and subject to their privacy policies, therefore We recommend you to review your privacy settings and to read the social network or collaborator privacy policies to obtain more detailed information about the use they make of your personal data when using their services.

### 4. For marketing purposes.

This purpose includes the processing of your data, mainly, for:

- Personalise the services we offer you and enable us to give you recommendations based on your interactions with us on the Platform and an analysis of your user profile (for example, based on your purchase and browsing history).
- If and when you subscribe to our Newsletter, we will process your personal data to **manage your subscription**, including to **send customised information** on our products or services through various means (such as e-mail or SMS). We may also make available to you this information through push notifications in case you have activated them in your device.
  - Accordingly, please take into account that this data processing implies **analysis of your user or customer profile** to establish your preferences and therefore which products and services are most fit to your style when sending you information. For example, based on your purchases and browsing history (i.e., depending on the articles that you clicked), we will make you suggestions on products that we believe may interest you and, if you are a registered user, we will provide you with the "recover cart " functionality.
  - Remember that **you may unsubscribe from the Newsletter at any time** without cost through the "Newsletter" section of the Platform, in addition to through the instructions that we provide you with in each notice. If you do not want to receive push notifications, you can deactivate this option in your device.
- Show you ads on the Internet which you may see when visiting websites and apps, for example, on social media. The ads you see may be random, but on other occasions they may be ads related to your preferences or purchase and browsing history.
  - If you use social media, we may provide the companies with which we collaborate certain information so that they, as joint controllers, can show you our brand ads and, in general, offer you and users like you advertisements which take into account your profile on said social media sites. If you want information about the use of your data and how advertising works on social media, we recommend you review the privacy policies of the social media sites on which you have profiles.
  - We also use your data to carry out measurement and segment analyses on the ads which we show users on some of our collaborators' platforms. To do this we collaborate with these third parties who offer us the necessary technology (for example, cookies, pixels, SDK) to use these services. Keep in mind that we may need to provide them with certain information or some form of identifier each time

(for example, the advertising ID associated with the device, an identifier associated with a cookie, etc.) If you would like more information in this respect, please review our Cookies Policy. Likewise, you can reset your advertising ID or disable personalised ads on your device, adjusting your preferences in settings section of your device.

- **Data enrichment:** When we gather your personal data from a variety of sources, we may consolidate them under certain circumstances for the purpose of improving our understanding of your needs and preferences related to our products and services (including for the purposes of analyses, generating user profiles, marketing studies, quality surveys and improving our interactions with our customers). This refers, for example, to the way we may combine your registered account information, using the same email linked to your account or to information which is automatically compiled (such as IP and MAC addresses or metadata) which we may link with the information you have provided us directly through your activity on the Platform.
- To perform **promotional actions** (for example, for the organization of competitions or to send the list of items stored to the e-mail you designate). On participating in any promotional action, you authorise us to process the personal data that you have shared with us depending on the promotional action and disclose them through different media such as social networks or the Platform itself. In each promotional action in which you participate you will have available the terms and conditions where we will be providing more detailed information about the processing of your personal data.
- To disseminate in the Platform or through our channels in the social networks photographs or pictures that you shared publicly, provided that you expressly give us your consent for the purpose.

#### 5. **Analysis of usability and quality** to improve our services

If you access our Platform, we inform you that we will treat your browsing data for **analytic and statistic purposes**, i.e., to understand the manner in which users interact with our Platform and with the actions we implement on other websites, so we can improve our services. In addition, we occasionally perform **quality surveys and actions** to know the degree of satisfaction of our customers and users and detect those areas in which we may improve.

### 3. **CANCELLATION, RECTIFICATION AND/OR OPPOSITION OF CUSTOMER DATA**

The interested party may exercise the following rights.

You may request information about the personal data stored concerning him/her (access).

You may request that inaccuracies in their personal data be corrected (rectification).

You may request the deletion or restriction of the processing of your personal data (erasure and restriction).

You may also request that your personal data be made available to you in a structured, current and machine-readable format (portability).

Opposition to processing, e.g. against receiving advertising (objection).

To do this, you can exercise your rights in writing by sending an e-mail to the following address: [it@boro-33.com](mailto:it@boro-33.com). If Boropuff has reasonable doubts as to the identity of the natural person submitting the request, it may ask you to provide additional information necessary to confirm the identity of the person concerned.

The data subject also has the right to lodge a complaint with the data protection authorities (Spanish Data Protection Agency). However, we invite you to contact us if you have any questions regarding your data in order to resolve them.

Users must guarantee the truthfulness, accuracy, authenticity and validity of the personal data collected from them. We do not collect personal data from minors. It is the responsibility of the parent/legal guardian to ensure the privacy of minors, making every effort to ensure that they have authorised the collection and use of the minor's personal data.

We have appointed a data protection officer (DPO) for any issues relating to your personal data. He or she can be contacted at [it@boro-33.com](mailto:it@boro-33.com).

#### 4. SOCIAL NETWORKS

Through our website you can access our social networks which are open to all users. These are websites where users can register and follow us for free. In these social networks users can learn about our activities, opinions, access to photos and videos. Users of these social networks should be aware that this site is independent of the website [www.boropuff.com](http://www.boropuff.com) and is open, i.e. it is visible to all its users, and the privacy policies to be applied to these contents are those set by each social network. Boropuff is not the owner of the social networks.

#### 5. HOW ARE WE LEGALLY PERMITTED TO PROCESS YOUR DATA?

The legal terms on which we are permitted to process your personal data also depends on the purpose for which we process them, as in the following description.

##### PURPOSE:

##### 1. To manage your Platform user registration

###### Legal standing

We process your data because this is **necessary on the terms regulating the use of the Platform**. In other words, for you to be able to register as a user on the Platform, we need to process your personal data, since we would otherwise be unable to manage your registration.

We consider we have a **legitimate interest** to link to your account your purchases and the data collected through different channels of the Platform about your activity.

If you opt to use the access or login through a social network, we are legally permitted to process your data given the **consent** that you give when authorising the assignment of your data from the social network.

##### 2. Development, performance and making of the purchase or services contract

###### Legal standing

We process your data because their processing is necessary for us **to make the purchase or services contract** with you.

Certain processing of data related to the purchase process is activated only because you request or authorise it. In these cases, our processing of your data is supported by your own **consent**.

We consider that we have a **legitimate interest** to carry out the necessary verifications to detect and prevent potential fraud or fraudulent uses of the Platform, for example when you make a purchase or return. We understand that the processing of these data is positive for all the parties involved: for you, as it allows us to put in place measures to protect you against attempted

fraud perpetrated by third parties; for Us, as it allows us to avoid unauthorised uses of the Platform; for all our customers and society, as it also protects their interest by ensuring that fraudulent activities are discouraged and detected when they do occur.

### 3. Customer Support

#### Legal standing

We consider that we have **legitimate interest** in answering the requests or queries raised by you through the existing different contact channels. We understand that the processing of these data is also beneficial to you to the extent that it enables us to assist you adequately and answer to the queries raised.

When you get in touch with us, in particular, for the management of incidents related to your order or the product/service acquired through the Platform, the processing of your data is necessary **to perform the purchase contract**.

When your request is related to the exercise of your rights on which we inform you below, or to claims on our products or services, we are legally permitted to process your data **for compliance with our legal obligations**.

### 4. Marketing

#### Legal standing

We are legally permitted to process your data for marketing purposes due to the **consent** that you give us, for example when you accept receiving customised information through multiple channels, when authorising the sending of push notifications in your device, when you configure it in the privacy settings of your device, when you consent through the cookies settings or when accepting the legal terms and conditions to participate in a promotional action or to publish your pictures on the Platform or on our social networks' channels.

To offer you personalised services or to show you customised information, whether on our Platform or those of third parties, as well as to engage in data enrichment we consider that we have a legitimate interest to conduct a profiling with the information that we have about you (such as your browsing, preferences or purchase history) and the personal data that you have provided us, such as the age range or language, since we understand that the data processing of these data is also beneficial to you because it allows you to improve your user experience and access the information in accordance with your preferences.

### 5. Analysis of usability and quality

#### Legal standing

We consider that we have a **legitimate interest** in analysing the Platform usability and the user's satisfaction degree, since we understand that that the processing of these data is also beneficial for you because the purpose is to improve the user experience and provide a higher quality service.

## 6. HOW LONG WILL WE KEEP YOUR DATA?

The time for which we will keep your data will depend on the purposes for which we process them, as explained below:

### PURPOSE:

#### 1. To manage your Platform user registration

##### Legal standing

We process your data because this is **necessary on the terms regulating the use of the Platform**. In other words, for you to be able to register as a user on the Platform, we need to process your personal data, since we would otherwise be unable to manage your registration.

We consider we have a **legitimate interest** to link to your account your purchases and the data collected through different channels of the Platform about your activity.

If you opt to use the access or login through a social network, we are legally permitted to process your data given the **consent** that you give when authorising the assignment of your data from the social network.

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Certain processing of data related to the purchase process is activated only because you request or authorise it. In these cases, our processing of your data is supported by your own **consent**.

We consider that we have a **legitimate interest** to carry out the necessary verifications to detect and prevent potential fraud or fraudulent uses of the Platform, for example when you make a purchase or return. We understand that the processing of these data is positive for all the parties involved: for you, as it allows us to put in place measures to protect you against attempted fraud perpetrated by third parties; for Us, as it allows us to avoid unauthorised uses of the Platform; for all our customers and society, as it also protects their interest by ensuring that fraudulent activities are discouraged and detected when they do occur.

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#### 7. DO WE SHARE YOUR DATA WITH THIRD PARTIES?

On the occasion of the purchase your data may be communicated to the following recipients:

- Banking institutions for the payment of purchases by card and/or the study of the financing of purchases and obtaining consumer credit.
- Entities that provide fraud investigation, detection and prevention services, as well as minimising the risk of fraud, based on the legitimate interest recognised by current legislation.
- To the Office of Consumers and Users in the event of a complaint.
- To wholesalers in the case of guarantees or repairs. To those transport companies that may have been commissioned to send the corresponding orders to customers. These recipients may be located inside or outside Spanish territory, depending on the product and/or service purchased.
- In the legally established cases, such as the case of the Security Forces and Corps.
- To public administrations to whom we have to provide information in order to comply with our legal obligations.

BoroPuff guarantees the confidentiality of the data provided and guarantees that under no circumstances will it be passed on for any other use without the prior express consent of our clients. We will only ask you for the data necessary to provide the required service and it will only be used for this purpose.

Boro33 S.L. reserves the right to rectify, change, or replace in part or in full the aforementioned text, to be aware of the modifications we recommend you visit this section regularly.

Policy updated on the 14th of August 2023.