

For your convenience, we have provided this Data Protection Policy Translated. This translation is for informational purposes only, and the definitive version of this document is [the Spanish version](#).

Privacy Policy v1.0.3

Updated: February 24th 2023

Common issues for all treatment activities:

Who is responsible for the processing of your data?

- Data controller: BLOCKCHAIN CUSTOMS TECHNOLOGY, S.L.
- Document number: B88019286
- Fiscal address: Yécora, 61 - 4º A, CP 28022 Madrid
- Phone number: 653 634 848
- Email address: info@usyncro.com

What are your rights when you give us your details?

Anyone is entitled to obtain confirmation as to whether or not we are processing personal data concerning them. In this respect, you have the right to request:

Access: The person who provides us with his or her data has the right to obtain confirmation from the data controller as to whether or not the data concerning him or her is being processed, as well as detailed information about certain aspects of the processing being carried out.

Rectification: The person who provides us with his or her data shall have the right to obtain the rectification of inaccurate personal data concerning him or her or the completion of incomplete personal data.

Deletion: The person who provides us with their data will have the right to request the deletion of their personal data; in any case the deletion will be subject to the limits established in the regulatory norm.

Limitation of processing: The person who provides us with their data will have the right to request the limitation of the processing of their personal data.

Opposition to processing: Under certain circumstances, and for reasons related to their particular situation, the persons who provide us with their data may oppose the processing of their data. The entity will stop processing them, except for legitimate, compelling reasons, or the exercise or defense of possible claims.

Right to the portability of your data: The person who provides us with his or her data shall have the right to receive the personal data concerning him or her, which he or she has provided to the person responsible for the processing, in a structured, commonly used and machine-readable form, and to transmit them to any other person who may be responsible for the processing.

You can exercise these rights by contacting the person responsible. To do so, you may use the contact details provided at the beginning of this document. If you wish to obtain additional information regarding the exercise of your rights, you may also contact the Spanish Data Protection Agency (AEPD). We also inform you that, if you believe it is appropriate, you have the right to withdraw at any time the consent given for any specific purpose, without affecting the legality of the processing, based on the consent prior to its withdrawal.

We also inform you that our entity has appointed a Data Protection Delegate in charge of ensuring compliance with data protection regulations in the processing carried out by our entity. You can contact our DPD at the following address dpd@myecustoms.com

In the event that you believe that your rights have not been adequately addressed, you may file a complaint with the Spanish Data Protection Agency (C/ Jorge Juan, 6 - 28001 Madrid or at www.agpd.es).

Specific issues for each treatment activity:

SECURITY GAP PROCESSING

For what purpose do we process your personal data? The management and notification of security breaches

How long will we process your data? They will be kept for the time necessary to fulfil the purpose for which they were collected and to determine any responsibilities that may arise from that purpose and from the processing of the data. Once this time has elapsed, they will be cancelled/deleted.

Why do we treat your data? Legal obligation of the person in charge.

To whom will your data be communicated? Other public administration bodies.

CONTACT PROCESSING

For what purpose do we process your personal data?

To manage and respond to requests for information and quotes, as well as to maintain contact for professional or business purposes with individuals, including those representing legal entities, with whom the entity has a relationship.

How long will we treat your data?

They will be kept for the time necessary to fulfill the purpose for which they were collected and to determine any responsibilities that may arise from such purpose and from the processing of the data. Once this time has elapsed, they will be automatically cancelled/deleted.

Why do we treat your data?

Legitimate interest of the person responsible.

To whom will your data be communicated?

In compliance with the provisions of Organic Law 3/2018, of December 5th, on the Protection of Personal Data and Guarantee of Digital Rights, as well as Regulation 2016/679 of the European Parliament of the Council of April 27th, 2016 regarding the Protection of Physical Persons concerning with the processing of personal data and the free circulation of these data, we inform you that your data will be processed and they will be incorporated into the files of BLOCKCHAIN CUSTOMS TECHNOLOGY, S.L. for operational purposes (related to your role as a client of the company), commercial (sending information about the company, the sector, products and services) and statistics.

The client accepts that their data may be transferred, exclusively, except for legal obligations, for the purposes indicated above, to other companies with which BLOCKCHAIN CUSTOMS TECHNOLOGY, S.L. concludes collaboration agreements, respecting in any case the current legislation on data protection of personal nature and without the need for each first assignment to be communicated to the aforementioned assignees.

All data is treated with absolute confidentiality, not being accessible to third parties for different purposes for which they have been authorized.

BLOCKCHAIN CUSTOMS TECHNOLOGY, S.L. guarantees that all personal data contained in this document will be used for the purpose, in the manner and with the limitations and rights granted by Organic Law 3/2018, of December 5th, on the Protection of Personal Data and Guarantee of Digital Rights. This consent is granted without prejudice to all the rights that assist you by virtue of the aforementioned rule, and especially the possibility of freely exercising the rights of access, rectification, opposition, deletion, limitation of treatment, portability and no longer be subject to of individualized decisions of your data and revocation of your authorization without retroactive effects, which may be exercised by directing written communication to BLOCKCHAIN CUSTOMS TECHNOLOGY, Avenida de la Hispanidad S / N Floor 4 Office 408, 28042 Madrid and attaching a photocopy of the DNI, or through the email address: info@usyncro.com

ACCESS AND EXIT CONTROL PROCESSING

For what purpose do we process your personal data? Management of people entering and leaving the entity's facilities

How long will we process your data? They will be kept for the time necessary to fulfil the purpose for which they were collected and to determine any responsibilities that may arise from that purpose and from the processing of the data. Once this time has elapsed, they will be cancelled/deleted.

Why do we treat your data? Consent of the interested party, Legal obligation of the person responsible, Contractual relationship for the execution of a contract, Legitimate interest of the person responsible.

To whom will your data be communicated? Your data will not be disclosed to third parties, except under legal obligations.

CLAIMS PROCESSING

For what purpose do we process your personal data? Management of the exercise of rights under data protection legislation and complaint forms

How long will we process your data? They will be kept for the time necessary to resolve the complaints.

Why do we process your data? Legal obligation of the person in charge.

To which persons will your data be communicated? Other public administration bodies.

SERVICE PROVISION AND PRODUCT MARKETING PROCESSING

For what purpose do we process your personal data? To provide our own services derived from the activity and distribution or marketing of our products. Tax and accounting management in order to comply with legal obligations

How long will we process your data? They will be kept for the time necessary to fulfil the purpose for which they were collected and to determine any responsibilities that may arise from that purpose and from the processing of the data. Once this time has elapsed, they will be cancelled/deleted.

Why do we treat your data? Contractual relationship for the execution of a contract.

To which persons will your data be communicated? In compliance with the provisions of Organic Law 3/2018, of December 5th, on the Protection of Personal Data and Guarantee of Digital Rights, as well as Regulation 2016/679 of the European Parliament of the Council of April 27th, 2016 regarding the Protection of Physical Persons concerning with the processing of personal data and the free circulation of these data, we inform you that your data will be processed and they will be incorporated into the files of BLOCKCHAIN CUSTOMS TECHNOLOGY, S.L. for operational purposes (related to your role as a client of the company), commercial (sending information about the company, the sector, products and services) and statistics.

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SUPPLIER PROCESSING

For what purpose do we process your personal data? Management of the commercial relationship with suppliers.

To provide services strictly necessary for the proper functioning of the Website, the following service providers are used under their corresponding privacy conditions: Stripe for collections. <https://stripe.com/es/privacy>

How long will we process your data? They will be kept for the time necessary to fulfil the purpose for which they were collected and to determine any responsibilities that may arise from that purpose and from the processing of the data. Once this time has elapsed, they will be cancelled/deleted ex officio.

Why do we treat your data? Contractual relationship for the execution of a contract.

To which persons will your data be communicated? In compliance with the provisions of Organic Law 3/2018, of December 5th, on the Protection of Personal Data and Guarantee of Digital Rights, as well as Regulation 2016/679 of the European Parliament of the Council of April 27th, 2016 regarding the Protection of Physical Persons concerning with the processing of personal data and the free circulation of these data, we inform you that your data will be processed and they will be incorporated into the files of BLOCKCHAIN CUSTOMS TECHNOLOGY, S.L. for operational purposes (related to your role as a client of the company), commercial (sending information about the company, the sector, products and services) and statistics.

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HUMAN RESOURCE PROCESSING

For what purpose do we process your personal data? Management of the entity's work staff, including the prevention of occupational risks and time control

How long will we process your data? They will be kept for the time necessary to fulfil the purpose for which they were collected and to determine any responsibilities that may arise from that purpose and from the processing of the data. Once this time has elapsed, they will be cancelled/deleted ex officio.

Why do we treat your data? Contractual relationship for the execution of a contract, Legitimate interest of the person responsible, Legal obligation of the person responsible.

To which persons will your data be communicated? Other public administration bodies, social security organisations, organisations or persons directly related to the person responsible, banks, savings banks and rural banks, tax authorities.

RECRUITMENT PROCEDURE

For what purpose do we process your personal data? Management of the relationship with the candidates for a job in the entity

How long will we process your data? They will be kept for the time necessary to fulfil the purpose for which they were collected and to determine any responsibilities that may arise from that purpose and from the processing of the data. Once this time has elapsed, they will be cancelled/deleted ex officio.

Why do we treat your data? Consent of the interested party.

To whom will your data be communicated? No data will be passed on to third parties, except for legal obligations.

VIDEO SURVEILLANCE PROCESSING

For what purpose do we process your personal data? To guarantee the safety of people, goods and facilities

How long will we process your data? They will be kept for the time necessary to fulfil the purpose for which they were collected and to determine any responsibilities that may arise from that purpose and from the processing of the data. Once this time has elapsed, they will be cancelled/deleted ex officio.

Why do we treat your data? Legitimate interest of the person responsible.

To whom will your data be communicated? Law enforcement agencies.