In case of contradiction, the **Spanish version** has prevalence

Website owner details:

COMPANY NAME: COMPEGPS TEAM SL

• **CIF**: B63123962

DOMAIN: Www.twonav.com

Postal address:

COMPEGPS TEAM SL

C/ Draper 13 08350, Arenys de Mar, Barcelona, (Spain)

PHONES: 933968068

• ELECTRONIC ADDRESS: support@twonav.com

In accordance with current and applicable regulations on the protection of personal data, we inform you that your data will be incorporated into the processing system owned by COMPEGPS TEAM SL with NIF B63123962 and registered office at C/DRAPER N° 13,08350 ARENYS DE MAR (BARCELONA). Below, we indicate the most notable aspects of the treatments performed:

- Management of contracting online services
 - Purpose: Collection, registration and processing of web user data for the correct provision of the service.
 - Conservation period: conservation of copies of the documents until the actions to claim possible liability expire.
 - **Legitimate basis:** The execution of the contract.
 - Data Typology:
 - Basic data: Name and surname, NIF, Email address, Financial or insurance data.
 - Transfers: your data will be communicated if necessary to Organizations and/or public administration with jurisdiction in the matter in order to comply with the obligations established in the applicable regulations. Furthermore, it is reported that the legitimizing basis for the transfer is compliance with a law.
- Online product purchase management
 - Purpose: Capture, registration and processing of data to be able to manage the payment and shipping of the products.

- Conservation period: 5 years in compliance with the tax law and 10 years for tax documentation in compliance with LO 7/2012.
- Legitimate basis: Compliance with a law.
- Data Typology:
 - **Basic data:** Name and surname, Postal address, Email address, Signature, Financial or insurance data.
 - Transfers: your data will be communicated if necessary to the Tax Agency, Banks, Savings Banks and Organizations and/or public administration with jurisdiction in the matter in order to comply with the tax and fiscal obligations established in the applicable regulations. Furthermore, it is reported that the legitimizing basis.
- User registration
 - Purpose: Collection, registration and processing of data to be able to register as a user.
 - Conservation period: as long as the consent given is maintained, except legal obligation.
 - Legitimate basis: The consent of the interested party.
 - Data Typology:
 - Basic data: Name and surname, Telephone, NIF, Postal address, Email address.
- Commercial actions web form
 - Purpose: Collection, registration and processing of data for the purposes of responding to your queries and/or requests, as well as advertising and commercial prospecting.
 - Conservation period: as long as the consent given is maintained, except legal obligation.
 - o **Legitimate basis:** The consent of the interested party.
 - Data Typology:
 - Basic data: Name and surname, Email address
- Web Form Management
 - o **Purpose:** Answer your queries and/or requests.
 - Conservation period: as long as the consent given is maintained.
 - Legitimate basis: The consent of the interested party.
 - Data Typology:
 - Basic data: Name and surname, Email address, IP address.

- Newsletter
 - Purpose: Management of subscription to the newsletter, to make the corresponding shipments.
 - Conservation period: as long as the consent given is maintained.
 - Legitimate basis: The consent of the interested party.
 - Data Typology:
 - Basic data: Name and surname. Email address
- Cookie installation
 - Purpose: Management and installation of cookies.
 - Conservation period: as long as the consent given is maintained.
 - Legitimate basis: The consent of the interested party.
 - Data Typology:
 - Basic data: Email address, IP address
- Web user management
 - Purpose: Collection, registration and processing of user data.
 - Conservation period: as long as the consent given is maintained, except legal obligation.
 - Legitimate basis: The consent of the interested party.
 - Data Typology:
 - Basic data: Name and surname, Email address

1.1 RIGHTS OF INTERESTED PARTIES

COMPEGPS TEAM SL informs Users that they may exercise the rights of access, rectification, limitation, deletion, portability, opposition to the processing of their personal data and the right not to be subject to automated decisions, including profiling, before the Data Controller, as well as the withdrawal of the consent given.

- **Right of Access:** It is the user's right to obtain confirmation as to whether their data is being processed and, in such case, the specific personal data processed and the legal information of the processing (purposes, legitimizing basis, conservation periods, transfers, origin of data, etc.).
- **Right to Rectification:** It is the right of the affected person to have data modified that turns out to be inaccurate or incomplete. In relation to the website, it can only be satisfied in relation to that

- information that is under the control of the website, for example, eliminating comments published on the page itself, images or web content that contain personal data of the user.
- Right to Limitation of processing: It is the right to limit the purposes of the processing originally planned by the data controller in certain cases.
- **Right of Deletion:** It is the right to delete the user's personal data, except as provided in the RGPD itself (freedom of expression and information, conservation obligations, formulation, exercise or defense of claims, etc.).
- **Right to Portability:** The right to receive the personal data that the user has provided, in a structured format, commonly used and machine readable, and to transmit it to another person responsible when the treatment is based on consent or the execution of a contract. and is carried out by automated means.
- **Right to Oppose:** It is the right of the user to not have their personal data processed or to cease their processing by the website when the processing is based on legitimate interest or public interest. or when it comes to direct marketing treatments.
- Right not to be subject to automated decisions, including profiling: When the processing is not necessary for the conclusion or execution of a contract, nor is it authorized by the law of the European Union or the Member States nor is it based on the consent, you have the right not to be subject to a decision based solely on automated processing, including profiling, that produces legal effects or similarly significantly affects you.
- **Right to withdraw consent:** For any processing based on your consent, you have the right to withdraw it, at any time and free of charge.

To exercise any of the data protection rights described above, you must follow the following instructions:

- Submission of a letter to the address C/ DRAPER N° 13,08350 ARENYS DE MAR (BARCELONA) (for the attention of COMPEGPS TEAM SL) or by email to.
- The letter sent by the owner of the personal data (interested party) requesting the exercise of rights must take into account the following:

- You must identify yourself reliably and, in the event that there are doubts about the identity of the applicant, you will be asked to correct the request (e.g. by requesting more information, such as the DNI number, the DNI document, the email address you provided)., etc.)
- The request can be made by the representative, legal or voluntary, when he or she is duly identified and authorized by the owner of the data (through express authorization from the owner to exercise the very personal rights regulated in the regulations on the protection of personal data).
- Petition in which the request is specified (Right/s that are intended to be exercised). If you do not refer to a specific treatment, you will be provided with a response in relation to all the treatments that affect your personal data. If you request information about a specific treatment, only the information about it. If you request it by phone, you will be instructed to do so in writing and you will be informed how you can do it and the address to which you must send it. You will never be given information over the phone.
- o Postal or electronic address for notification purposes.
- o Documents supporting the request you make, if necessary.
- The applicant must use any means that allows proof of sending and receiving the application.

Finally, we inform you that you have the right to file a claim with the Spanish Data Protection Agency in the event that you are aware or consider that an event may constitute a breach of the applicable regulations on data protection.

COMPEGPS TEAM SL undertakes to adopt the necessary technical and organizational measures, according to the level of risks that accompany the treatments carried out by them and indicated in the terms and conditions of use section, so as to guarantee their integrity, confidentiality and availability.

Last update: January 25, 2024