

ANINVER DEVELOPMENT PARTNERS, S.L. PRIVACY POLICY

This policy sets out the basis on which any personal data that you provide to us, or that we collect from you or a third party, will be processed. Please read the following carefully to understand how we will use your personal data and your rights in relation to it.

Aninver Development Partners, S.L. (hereinafter "Aninver"). Aninver is committed to protecting and respecting your privacy. The General Data Protection Regulations (GDPR) ((EU) 2016/679) imposes responsibilities on all companies regarding the collection and use of information about individuals. Furthermore, the Spanish Organic Law 3/2018, of December 5, on Personal Data Protection and Digital Rights, protects personal data and guarantees digital rights.

This policy explains how Aninver uses the personal data that we collect from the User when you use the Aninver website.

Personal data means any information relating to an identified or identifiable natural person ("data subject"); an identifiable person is one who can be identified, directly or indirectly, in particular by reference to an identification number or to one or more factors specific to his physical, physiological, mental, economic, cultural or social identity.

Data Controller: ANINVER DEVELOPMENT PARTNERS, S.L.

Address: Paseo de la Farola 8, entreplanta, oficina 5, Malaga 29016, Spain. NIF: B65909863

E-Mail: membership@infrappworld.com Registered in: Commercial Registry of Malaga

Represented by:

Jose de la Maza, Managing Director of Aninver, jm@aninver.com

PURPOSE AND LEGAL BASIS OF PROCESSING

ANINVER collects and processes personal data about individuals for a variety of reasons necessary to deliver our business. Our policy is to treat individuals fairly and within the terms of the law paying attention to the individual's right to privacy.

ANINVER only processes or uses personal data for specific and legitimate purposes.

Personal data is held securely and confidentially.

The types of personal information we collect includes but is not limited to:

- Name
- Postal address
- Personal contact details (eg. telephone, email, or facsimile number)
- Information provided by you through our website, Facebook or Twitter accounts
- Information provided through other public media forums (e.g. LinkedIn, etc)
- Bank Accounts
- Passports

- Your contractual and performance history with us

Aninver collects this data so that we:

- can allow the User access to our services;
- keep the User informed about services or products that may be of interest to you, including those provided by a third party, and to provide technical and commercial information about the SITE;
- can improve the supply of our services to the User;
- study and design new services under the User preferences;
- send commercial communications by e-mail advertising, SMS, MMS;
- undertake statistical studies;
- process orders, requests or any type of request made by the User through any form of contact that is made available to the User on the SITE;
- can send the User our newsletter. The User provides this information when you:
- register online or place an order for any of Aninver’s services;
- use or view the Aninver website via your browser’s cookies.

The lawful basis for processing may vary depending on the data being held. It may be held and processed for more than one legal basis:

Purpose/Activity	Lawful Basis for Processing
Registering online or viewing the Aninver website via your browser cookies	Legitimate Business Interest
Placing an order for Aninver services	Contractual Necessity
Newsletter – to keep interested parties informed	Legitimate Interest
Correspondence with clients/partners/sub-contractors/Suppliers	Legitimate Interest
Registering online or viewing the Aninver website via your browser cookies	Legitimate Business Interest
Payment details including bank account details	Contractual Necessity

Personal information may be shared with third parties such as other members of the Aninver Group, partner companies or potential partner companies of ANINVER, Agencia Tributaria, Seguridad Social, Pension and Life Assurance providers, Insurance providers, medical assessment providers, Refinitiv World Check, company banks, clients or potential clients of ANINVER, government banks and regulators. If within the EEA, some of these third parties may also be data-controllers. As an international development management consultancy company, we may sometimes need to share your data outside of the EEA. Where it is shared with our colleagues and offices overseas, they will treat your data in the same way as we do Spain. If your data is included in a proposal, you will be specifically asked to confirm that you are happy for your data to be shared with the specified client who may be based outside the EEA.

ANINVER is relying upon the EU provisional trade and co-operation agreement and adequacy decisions to transfer data to the UK and any personal data transfers from the EU, are transfers

taking place between two separate data protection regimes. Aninver does not manage data relative to electronic payments such as credit card numbers. We process all our payments via Stripe, a payment service provided by Stripe Inc., which allows users to make online payments. Accepting our privacy policy implies you agree to Stripe privacy policy and give consent to manage your basic data for payments/invoicing management. For more information, please visit the Stripe privacy policy – <https://stripe.com/it/privacy>.

Aninver uses Mailchimp for communications with their users for commercial purposes. Mailchimp is a marketing platform and by accepting our privacy policy you consent the treatment of the data collected for this purpose. For more information, please visit Mailchimp Addendum policy: <https://mailchimp.com/legal/data-processing-addendum/>

RETENTION PERIODS

We will retain your personal data for as long as necessary. The duration depends on the nature of the personal data and the purposes for which it was received. We will also retain your personal data as required to fulfil our contractual obligations and to comply with our legal obligations, resolve disputes, and enforce our agreements.

Where we no longer need to process your personal data for the purposes set out above, we will delete your personal data from our systems.

USING COOKIES AND ACTIVITY FILES

Aninver or a third party contracted to provide measurement services may use cookies when the Users browse the SITE. Cookies are files sent to the browser by a web server in order to record the User's activities during its navigation.

Cookies used by the SITE are only associated with an anonymous user and computer, and themselves do not provide personal data of the User.

By using cookies, it is possible to the SITE's server to recognize the web browser used by the User in order to make navigation easier, allowing, for example, access to Users who have registered previously, access areas, services, promotions or competitions reserved exclusively for them without having to register each time. They are also used to measure the audience and traffic parameters, monitor the progress and number of entries. The User has the ability to configure its browser to notify you of the receipt of cookies and to prevent their installation on your computer. Please see the instructions and manuals on your browser for more information.

For the usage of the SITE, it is not necessary for the User to permit the installation of cookies sent by the SITE or any third parties acting on our behalf, notwithstanding that it is necessary for the user login as such in each of the services that require prior registration or "login".

The cookies used on the SITE are in any case temporarily for the sole purpose of making more efficient onward transmission. Under no circumstances the use of cookies is to collect personal information.

YOUR RIGHTS

The User has the right to:

- access any personal data Aninver holds about you. Aninver will provide details of the purposes of the processing, the types of personal data we hold and the people to whom your personal data has been disclosed;
- data Portability – Subject to certain conditions, the User is entitled to receive the personal data which you have provided to Aninver and which is processed by Aninver by automated means, in a structured, commonly-used machine readable format.

- have inaccurate or incomplete personal data corrected or to restrict the processing of personal data whilst the accuracy is checked;
- where data is held for legitimate business interest the User has the right to ask to have personal data Aninver holds about you erased. This enables the User to ask Aninver to delete or remove personal data where there is no good reason for Aninver continuing to process it. The User also has the right to ask Aninver to delete or remove your personal data where the User has successfully exercised your right to object to processing, where Aninver may have processed your information unlawfully or where Aninver are required to erase your personal data to comply with local law;
- withdraw consent at any time where Aninver are relying on consent to process the User's personal data. However, this will not affect the lawfulness of any processing carried out before the User withdraws your consent; and
- lodge a complaint with the Española de Protección de Datos – AEPD if you have a concern about your personal data:

You can exercise your rights at any time by contacting us at membership@infrappworld.com

The User can unsubscribe from any of the subscription services provided by clicking the unsubscribe section of all emails sent by Aninver.

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who does not have the right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

There is no charge for you to access your data, however, we reserve the right to charge a fee for reasonable administration costs where the request is excessive or to provide further copies of your data.

We aim to respond to all legitimate requests within one month.

For questions regarding the content of this Privacy Policy, please contact us. membership@infrappworld.com

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