# **Privacy Policy of Plug and Play**

#### Overview

PLUG AND PLAY is committed to respect user's privacy and the security of their personal data. Therefore, through this privacy policy (hereinafter "**Privacy Policy**"), users (hereinafter, "**Users**") are informed of the way in which PLUG AND PLAY collects and processes the personal data provided by User's through the website [•] (hereinafter, "**Website**").

## 1. WHO PROCESSES YOUR PERSONAL DATA

Data controller: The main entity responsible for the processing of User's personal data in contractual and business relations is PLUG AND PLAY EMEA FUND MANAGEMENT, S.G.E.I.C., S.A., with Tax Identification Number A-72995699 and address at Av. del Testar, n°8, 46980 Paterna, Valencia (Spain).

Joint controllers: In addition, for certain processing operations some of PLUG AND PLAY's group's companies detailed here, will jointly process User's data and will decide on the purposes and the means used, being considered jointly responsible for these processing operations. User's may find detailed information about the data processed jointly under heading 6 "How do we process User's personal data", as well as the essential aspects of the processing agreements between the parties in accordance with Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 (hereinafter "GDPR").

Both the data controller and the joint controller entities described above are hereinafter referred to as "PLUG AND PLAY", unless they are expressly and individually identified as "Data Controller" or "Joint Controllers" for the data processing.

#### 2. HOW WE PROCESS YOUR PERSONAL DATA

PLUG AND PLAY will process User's personal data for different purposes, always in accordance with the provisions of the applicable regulations, respecting their rights and providing information with total transparency.

In consideration of the above, this Privacy Policy applies to European Users, taking into consideration that it complies with the GDPR. This is without prejudice to any applicable local data protection regulations.

# 3. DATA PROTECTION OFFICER (DPO)

PLUG AND PLAY entities located in Europe have appointed a Data Protection Officer, who will be available to answer any questions regarding the processing of User's personal data and the exercise of their data protection rights (GDPR rights).

Users can send to the Data Protection Officer their suggestions, queries, doubts or complaints via this email address: dpo@pnptc.com.

#### 4. WHAT PERSONAL DATA WE PROCESS

The following personal data will be used for the processing operations in this privacy policy. Not all of the data we inform you about is used for all data processing.

The type and details of the personal data used by the different processing operations described in section 6 are as follows:

- Identification data: name and surname
- Contact details: e-mail address and, where appropriate, telephone number.
- Data relating to your professional/employment activity: job position, activity sector, name of the company.
- Educational data: qualifications, training and professional experience, languages, etc.
- Data on personal circumstances: date of birth, address of residence.
- Socio-economic data: income or earnings, family unit or circle, level of wealth, fiscal data and tax data.
- User browsing data (cookies)

#### 5. HOW THE PROCESSING OF YOUR PERSONAL DATA IS LAWFUL

PLUG AND PLAY legitimizes the processing of User's data in accordance with the following lawful bases:

- In order to take steps at the request of the data subjects prior to entering into a contract (performance of the pre-contractual relationship).
- Execution of the contractual relationship
- User's consent for the processing of data

#### 6. HOW DO WE PROCESS USER'S PERSONAL DATA

#### **6.1.1 MANAGEMENT OF CONTACT FORMS**

Identification of joint controllers

This processing will be carried out jointly by certain PLUG AND PLAY group companies detailed in detailed in this list.

- **Purpose:** Receive and manage contact requests received through the web forms: from representatives of start-ups, large corporations or venture capitalists or joint ventures.
- **Lawful basis:** Execution of the pre-contractual and, where appropriate, contractual relationship.
- Type of data processed: Identification data, contact data (if applicable, telephone number), and data relating to the profession.

# 6.1.2 MANAGEMENT OF [●]

Identification of joint controllers

This processing will be carried out jointly by certain entities that make up PLUG AND PLAY are detailed in this list.

• Purpose: [●]

Lawful basis: [●]

Type of personal data processed: [•]

#### 7. RECIPIENTS

## 7.1 Communication of data to third parties

The User is informed that the personal data provided through our Website may be communicated to third parties (start-ups, corporates, joint ventures), as well as, where appropriate, to PLUG AND PLAY group's companies provided that such communication is necessary for the proper provision of services.

#### 7.2 Data processors

Depending on the purpose for which the personal data is processed, User's personal data may be processed by suitable providers necessary for the provision of services included in our Website such as, for example, the sending of newsletters. These service

providers will only process User's personal data as data processors, for the purposes and according to the instructions given by PLUG AND PLAY.

#### 8. INTERNATIONAL DATA TRANSFERS

International data transfers involve a flow of personal data from the EU to recipients established in countries outside the European Economic Area (the countries of the European Union, including Liechtenstein, Iceland and Norway).

PLUG AND PLAY processes User's personal data within the European Economic Area and contract with service providers located within the European Economic Area or in countries that have been declared to have an adequate level of protection.

Without prejudice to the foregoing, if PLUG AND PLAY contracts any of its services with suppliers that carry out processing outside the European Economic Area or in countries that have not been declared with an adequate level of protection, we will ensure that we guarantee the security and legitimacy of the processing of User's personal data, carrying out the data transfer under the subscription of Standard Contractual Clauses adopted by the European Commission on 4th of June 2021.

Likewise, we inform Users that in exceptional cases international data transfers may be carried out by Plug and Play entities located in Europe to PLUG AND PLAY LLC (USA) and other PLUG AND PLAY entities located outside the European Economic Area.

For these purposes, international data transfers are carried out in accordance with some of the conditions for carrying out such transfers, as established in the GDPR, for example, by subscribing to the Standard Contractual Clauses adopted by the European Commission on 4th June 2021. In this sense, Users may request a copy of the appropriate guarantees required by PLUG AND PLAY by sending their request to the e-mail address privacy@pnptc.com.

#### 9. DATA RETENTION PERIODS

PLUG AND PLAY will keep the personal data of the Users for the general periods set out below, in accordance with the specific purposes:

• Data necessary for the management of contact requests: for the time necessary to fulfill the purpose for which they were collected and, where appropriate, until the erasure of the data is requested.

- Data necessary for the management of events: until the event ends, without prejudice to the fact that in the event that the User has authorized it, their personal data will be kept in order to send them newsletters about events carried out by PLUG AND PLAY.
- Data necessary for the subscription of newsletters: Until the User revokes their consent, unsubscribing to the newsletter and/or exercising the right to erasure their personal data for this purpose.
- Data necessary for the management of job applications: For as long as the recruitment process lasts, and an applicant is assigned to the job vacancy. Without prejudice to the foregoing, applicant's data will be kept for the necessary time to fulfill the purpose for which they were collected and, where appropriate, until the User requests the erasure of their personal data.
- Data necessary for the management of requests for information on the office tour: During the time necessary to deal with the request and manage the appointment to make the tour at the co-working offices located in the USA and in any case, until the User exercises the right to erasure their personal data.

# 10. USERS' DATA PROTECTION RIGHTS

Users may, at any time and free of charge, exercise their rights to access, have inaccurate data rectified, object the processing, erase the personal data, right to data portability and the right to restrict the processing of their personal data by sending their request to the e-mail address privacy@pnptc.com, indicating specifically which data protection right the User wishes to exercise.

Without prejudice to the foregoing, the User may exercise the aforementioned GDPR rights before any of the joint controllers indicated in the first section of this Privacy Policy.

In any case, the User is informed that, in the event that the User considers that PLUG AND PLAY has violated or may have violated the rights that are recognized by the applicable data protection regulations, the User may contact the data protection officer by sending a letter to the e-mail address dpo@pnptc.com or, where appropriate, file a complaint before the corresponding supervisory authority. You can obtain information on the competent supervisory authorities here.

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