

This Privacy Policy document explains what data Conversed collects and stores, and how we use it. If you have any further questions or require more information about our Privacy Policy, please don't hesitate to contact us using the contact information provided below.

BASIC INFORMATION ON PERSONAL DATA PROTECTION

Data Controller:	"Conversed SL", hereinafter "Conversed".
Data Collected:	Mandatory Data: Phone number, nickname, and information sent through the chat. Data Collected by App Usage: Information about user activity on Conversed channels, such as page access and app usage. Data Protection and Anonymization: Encryption of conversations, disassociation from other user data, and storage of excerpts for future personalization.
Purposes:	1. To provide the service. 2. To prepare reports and statistics. 3. To develop new products and services. 4. To analyze the use and impact of Conversed services on its users.
Legitimate Basis:	1. User consent. 2. Legal obligation. 3. Execution of a contractual relationship. 4. Legitimate interest.
Recipients:	1. Data processors within and outside the European Union. 2. Competent authorities in case of request.
Retention:	Data is retained for as long as necessary to provide the Service and always in accordance with the requirements established in current legislation.
Rights:	Access, Rectification, Deletion, Limitation of Processing, Portability, Objection, not being subject to automated decisions, revocation, and filing a complaint/claim with the Supervisory Authority.
Contact:	hola+gdpr@conversed.es

DATA CONTROLLER

The Data Controller is the Spanish mercantile entity "Conversed S.L." NIF N°: B56247422, with address at Calle de la Begonia, 44, Alcobendas, Madrid 28109, Spain. Hereinafter, "Conversed" or the "Data Controller", owner of the Conversed mobile application, which offers conversational education services. The Application is accessible from www.conversed.es or through WhatsApp.

DATA COLLECTED

Conversed collects the following user data when the user accesses the application:

- **Data necessary for the use of the application:** Phone number and nickname (name, phrase, or emoji) configured on that platform for identification and any information sent through the Application's chat functionality to respond to your queries. This functionality uses some automated processes to assess how we can best meet your requests.
- **Data collected by the use of the application:** Pages and files accessed; time of access; browser version; operating system; device ID; previously visited pages (if you access our Application through a link); IP address; application information; mobile device information; session ID; in addition to data collected through cookies, which are regulated in our Cookies Policy.

The user should be aware that conversations will be anonymized and encrypted with a double encryption process and will be disassociated from the two previous User data. We may keep an excerpt of the conversation to personalize future interactions.

Finally, we emphasize that the data we may request, in general, is necessary to fulfill the purposes of our services. Therefore, if it is not provided or is not provided correctly, we will not be able to fulfill your requests.

PURPOSES OF THE PROCESSING

The purposes of the processing of users' personal data are as follows:

Service Improvement and Security:

- Provide and improve the Application service.
- Study how users learn and monitor their interactions.

- Maintain and improve the security of the Application.
- Prevent misuse of the Application.

Research and Development:

- Conduct analysis, surveys, contests, and advertising activities.
- Optimize the load distribution and operation of the Application.

Communication and Marketing:

- Communicate with users.
- Organize and promote services through different platforms and interfaces.

Legal Compliance and Response to Obligations:

- Comply with legal obligations towards users, third parties, and authorities.
- Respond to court orders and governmental or regulatory requests.

Data Management and Privacy Protection:

- Retain personal data for the necessary time and according to the user's link with the service.
- Guarantee the correct deletion or blocking of data after fulfilling its purpose, according to data protection regulations.

LEGITIMATE BASIS FOR PROCESSING

Depending on the different types of data processing necessary according to the purposes described above, the basis of legitimacy will be:

- The express and explicit consent of the data subject/user, obtained for one or more specific purposes;
- In the context of a contractual or pre-contractual relationship;
- For the legitimate interest of Conversed, provided that these interests do not override the interests or fundamental rights and freedoms of the data subject;
- For compliance with legal obligations applicable to the data controller.

RECIPIENTS

Certain personal data of users necessary to provide the services offered by Conversed may be shared with:

- Our providers, when required by the activity. These providers are known as Data Processors and Conversed will apply the necessary controls to ensure that the corresponding Data Processor complies with the technical and organizational measures required for the protection of personal data.
- Law enforcement agencies, judges, and courts, when required in compliance with a legal obligation.

RETENTION AND LOCATION OF PERSONAL DATA PROCESSED

The processing of personal data collected by Conversed will be carried out only to the extent and for the time necessary for the provision of the service to the user. However, Conversed will subject the processed data to review periods to block (and subsequently delete) those that are no longer processed or are no longer necessary for the purpose of the processing until their definitive deletion according to the deadlines set by current legislation.

Personal data processed and stored by Conversed are hosted on servers located within the

RIGHTS OF DATA SUBJECTS

Data subjects have the right to exercise, at any time and free of charge, the following rights:

- **Access:** Request information about the personal data we hold and its processing.
- **Rectification:** Correct inaccuracies or incomplete data.
- **Deletion:** Request the deletion of your personal data when, among other reasons, it is no longer necessary for the purposes for which it was collected.
- **Limitation of processing:** Obtain the limitation of data processing when any of the conditions provided for in data protection regulations are met.
- **Objection:** Object to the processing of your data in certain circumstances and for reasons related to your particular situation.
- **Portability:** Receive the personal data you have provided us in a structured, commonly used, and machine-readable format, and be able to transmit it to another controller.
- **Automated decisions:** Not be subject to decisions based solely on the automated processing of your data.
- **Right to file a complaint/claim with a Supervisory Authority:** Every data subject has the right to file a complaint with a supervisory authority, in particular in the EU Member State of their habitual residence, their place of work, or the place of the alleged infringement if the data subject considers that the processing of personal data relating to them infringes the GDPR; in Spain, the supervisory authority is the Spanish Data Protection Agency.

To revoke the consent granted or to exercise any of these rights, it is necessary to send an express request, along with proof of your identity, to the Data Controller. This can be done by sending an

email to hola+gdpr@conversed.es. We reserve the right to implement the verification measures we deem necessary to confirm the identity of the person requesting the exercise of their rights.

SECURITY

We respect your privacy and to ensure the confidentiality, integrity, availability, and resilience of our processing systems and services, we adopt the necessary technical and organizational measures to guarantee data security and prevent its alteration, loss, unauthorized processing, or access, taking into account the state of technology, the nature of the data stored, and the risks to which it is exposed.

ADDITIONAL INFORMATION AND CONTACT

If you have any questions, inquiries, or comments regarding the processing of your personal data, please send them to hola+gdpr@conversed.es. We are committed to ensuring the privacy and protection of your data and will respond to you as soon as possible.

UPDATES TO THE PRIVACY POLICY

Conversed reserves the right to modify the content of this Privacy Policy. The modifications will be made public on this website conversed.es or in the application, and Conversed users will be notified by any authorized means of communication. The relationship with users will be governed and bound by the policies that are publicly displayed at the specific time the user accesses the Conversed Application or the conversed.es website.

Last updated: December 1, 2023.