# EU Privacy Policy

Last updated: October 27, 2026.

## 1. DATA CONTROLLER

This privacy policy regulates the processing of personal data carried out by the data controller indicated below:

INFiLED EUROPE, SL

Address: Avinguda Diagonal 361, PB 2 (08019) Barcelona, Spain.

NIF: B67461137

Email address: euprivacy@infiled.com

Registered in the Mercantile Registry of Barcelona: Volume 46966, Page 185, Sheet B536670, Registration 1. INFiLED EUROPE, SL reserves the right to modify this Privacy Policy in accordance with its own criteria, or motivated by a legal, jurisprudential, or doctrinal change of the competent supervisory authorities. The use of the website after the changes will imply the acceptance of the same.

The website may contain links to external pages. INFiLED EUROPE, SL assumes no responsibility for the contents or for any other aspect related to these external pages or websites.

## 2. PERSONAL DATA

INFiLED EUROPE, SL will only collect personal data that is adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed, as appropriate in each case.

The user guarantees the authenticity of the data communicated and will be solely responsible for any false or inaccurate statement.

## 3. PURPOSES OF THE PROCESSING

Personal data will be processed by the data controller for the following purposes, as appropriate in each case:

- Review and, where appropriate, investigate and respond to messages received.
- Respond to people who have contacted INFiLED EUROPE, SL with the potential interest in becoming their customers, distributors or suppliers.
- Commercial and administrative management of the existing contractual relationship with its customers and suppliers, which will include the issuance and management of budgets, orders and other contractual documentation, as well as the issuance and control of the collection and payment of invoices.
- Maintenance of the contractual relationship with the interested party or with the company or organization in which they work or collaborate.
- Review and assessment of the information and/or documentation provided, with the aim of participating in a job selection process and/or assessing the suitability of their profile in the

company. In the event that it is of interest to INFiLED EUROPE, SL, it will contact the interested party with the intention of assessing their candidacy or to manage their registration. The company may keep your personal data for an additional period of 1 year from receipt, unless the candidate states that he/she is not interested.

- Send communications related to news, promotions, events and/or corporate information of INFiLED EUROPE, SL, and its products and/or services.
- Prevention, detection and control of abuse and fraud committed on or through the website.
- Management of compliance with legally stipulated obligations.

## 4. LEGITIMACY OF THE PROCESSING

The legal basis for the processing of personal data will be the user's consent, if it has been provided for sending communications relating to news, promotions, events and/or corporate information about INFiLED EUROPE, SL and its products and/or services. The user will have the right to withdraw consent at any time, without this affecting the lawfulness of the processing prior to its withdrawal.

The legal basis for the processing of personal data will be compliance with a legal obligation, if it has been provided for the following purposes:

- Review and, where appropriate, investigate and respond to messages received.
- Administrative management of the existing contractual relationship with its customers, which will include the issuance of invoices.
- Management of compliance with legally stipulated obligations.

The processing of personal data according to the aforementioned purposes is necessary for INFiLED EUROPE, SL to comply with the obligations imposed on it by applicable legislation.

On the other hand, the legal basis for the processing of personal data will be the application of the pre-contractual measures requested with the expressed intention of the interested party to sign a contract with the data controller if it has been provided for the following purposes:

- Respond to people who have contacted INFiLED EUROPE, SL with the potential interest in becoming their customers, distributors or suppliers.
- Review and assessment of the information and/or documentation provided, with the aim of participating in a personnel selection process and/or assessing the suitability of their profile in the company. In the event that it is of interest to INFiLED EUROPE, SL, it will contact the interested party with the intention of assessing their candidacy or to manage their registration. The company may keep your personal data for an additional period of 1 year from receipt, unless the candidate states that he or she is not interested.

The processing of personal data is necessary in order to be able to apply the pre-contractual measures requested by the interested party when voluntarily providing their personal data for the purposes indicated. Likewise, the legal basis for the processing of personal data will be the execution of the contract, if it has been provided for the following purposes:

- Commercial and administrative management of the existing contractual relationship with its customers, which will include the issuance and management of budgets, orders and other contractual documentation, as well as the control of the collection of invoices.

- Commercial and administrative management of the existing contractual relationship with its suppliers, which will include the management of budgets, orders and other contractual documentation, as well as the control of payment of invoices.

The processing of personal data according to the aforementioned purposes is necessary in order to be able to apply the requested pre-contractual measures and to be able to sign and execute the contract between INFiLED EUROPE, SL and its customers and/or suppliers.

Finally, the legal basis for the processing of personal data will be the legitimate interest of the data controller, if it has been provided for the following purposes:

- Maintenance of the contractual relationship with the interested party or with the company or organisation in which they work or collaborate. The legitimate interest of the data controller is recognised by the applicable regulations.
- Prevention, detection and control of abuse and fraud committed on or through the website.

Legitimate interest is based on the data controller's desire to maintain the website as a secure website.

## 5. RECIPIENTS

INFiLED EUROPE, SL will not communicate personal data to third parties, except to the competent authorities and/or bodies in the event of a legal obligation, as well as to service providers and third parties necessary for the management and execution of the contractual relationships and/or processing purposes defined herein. INFiLED EUROPE, SL may communicate personal data to its group companies, according to their legitimate interest in fulfilling internal administrative purposes or global control and maintenance governance. INFiLED EUROPE, SL intends to carry out international data transfers to providers located in countries that do not have regulations equivalent to the European one for the processing of personal data. This contracting will be carried out applying the guarantees and safeguards necessary to preserve the privacy of users, in particular, the Standard Contractual Clauses approved by the European Commission and the EU-US Data Privacy Framework. To obtain a copy of them, you can contact the data controller at euprivacy@infiled.com.

## 6. STORAGE PERIODS

Personal data will be processed for as long as necessary for the fulfilment of the purposes of processing indicated.

In the event that the legal basis of the processing consists of the user's consent, the data will be kept until it is revoked.

In any case, the personal data will be kept for the entire period of time that the data controller may be held responsible as stipulated by the applicable law, proceeding, where appropriate, to block the data until the corresponding limitation period has elapsed.

## 7. USER RIGHTS

We inform you that at any time you can exercise your rights of access, rectification, deletion, limitation, opposition and portability with respect to your personal data provided for in the regulations on data protection, by sending a letter to Avinguda Diagonal 361, PB 2 (08019) Barcelona, Spain or by email to euprivacy@infiled.com.

Specifically, you can exercise the following rights:

- Access your personal data.
- Obtain confirmation as to whether the companies of the group to which the controller is part are processing your personal data.
- Rectify inaccurate or incomplete data.
- Request the deletion of your data when, among other reasons, the data is no longer necessary for the purposes for which they were collected.
- To exercise the limitation of data processing when any of the conditions provided for in the data protection regulations are met.
- In certain circumstances and for reasons related to their particular situation with regard to the processing of their data, the interested parties may oppose the processing. In these cases, INFiLED EUROPE, SL will stop processing the data, except for compelling legitimate reasons, or the exercise or defence of possible claims.
- Obtain human intervention, to express their point of view and to challenge automated decisions taken by INFiLED EUROPE, SL, if applicable.
- Request the portability of your data.

In the event of disagreement in relation to the processing of your data, you can lodge a complaint with the Spanish Data Protection Authority (https://www.aepd.es).