

## Privacy Policy

We are EMPATHY SYSTEMS CORPORATION S.L., with CIF B83601377, located at Calle Jimena Fernández de la Vega 101, 33394 Gijón, Asturias (Spain) (hereinafter "EMPATHY" o "VISIBLE PRIVACY").

VISIBLE PRIVACY is the "Data Controller" of any personal data it may collect, process and hold about you, unless we inform you otherwise.

Your country or state-specific privacy laws may grant you certain unique rights with respect to your personal information, and we will do our best to reflect such rights on this notice.

### 1. What data do we collect? Why?

As a general rule, VISIBLE PRIVACY does not process users' personal data on our website.

However, in some cases, users may carry out activities on our website such as requesting information via forms or subscribing to our products for which we will need to process their personal data.

Below you can find the list of processing activities, data categories and lawful basis associated with the activities of our website:

- When you submit a question or request via our contact form, our social media or request a demo, we collect your contact details (such as name and email address). We need them in order to get back to you and fulfil your own request.
  - Legal basis: Legitimate interest.
- We collect your contact details in order to deliver our services. For example, we use your email address to create your user account, as well as to authenticate you, and to provide customer support. Our customers can contact [support@visibleprivacy.com](mailto:support@visibleprivacy.com) to obtain technical support and resolve any incidents or doubts about our products.
  - Legal basis: Contractual obligation.
- When you subscribe to one of our products or services, we need to collect some financial data in order to process your payment and billing successfully.
  - Legal basis: Contractual obligation.
- We offer our customers the possibility to receive commercial information about our products, services, events and newsletter. For this purpose, we collect your email

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address to send you the information. You can opt out of the newsletter subscription at any stage by clicking the unsubscribe link at the end of the email.

- Legal basis: Specific consent
- Due to security reasons, we collect but we do not process your Public IP. This personal data is not collected, nor processed for any other purpose than to maintain, manage and improve our website and offer support when facing a problem on our website.
  - Legal basis: Legitimate interest

## 2. What do our legal bases mean?

### **Contractual obligation**

We rely on our contractual obligation with you (as a subscriber or customer) in order to process your account and billing information.

### **Specific consent**

We rely on your specific consent to store and use your email address in order to deliver our newsletter or keep you posted about upcoming features, new releases, or company updates.

### **Legitimate interest**

We rely on our legitimate interest to fulfil your basic expectations as a potential customer. This includes getting back to you following a demo request or any other type of request or questions through the different channels provided- for which we need to process your basic contact details.

## 3. How long do we keep your data for?

VISIBLE PRIVACY will keep your data for the time necessary and/or legally established for the purpose for which they were collected. After this period of time, we will proceed to the deletion and destruction of the data.

Rest assured that throughout the entire data retention period, VISIBLE PRIVACY has adopted an optimal level of protection for the Personal Data that we handle, and we have installed the technical and organisational measures in accordance with the regulations to avoid personal data loss, misuse, alteration, unauthorised access, and theft.

## 4. Who has access to your personal data?

Your data may be shared and processed by other companies that belong to the *Empathy Holding Ltd* group. This data processing will be carried out in accordance with the legitimate bases described above, with no other use than to provide the service correctly.

Your data will not be transferred to third parties, unless there is a legal obligation to do so. Specifically, your data will be communicated to the Tax Authority and to banks and financial entities for collection for the service provided or product acquired and to those in charge of data processing, as necessary to perform the agreement.

All third party companies that we work with have signed a service provision agreement that obliges them to uphold the same privacy standards as we do.

When non-European applications are used, any international transfer will be made with the guarantees established in the GDPR. This ensures that the US software company complies with European data protection policies on data privacy.

You can consult the international data transfers that we carry out by contacting [dpo@empathy.co](mailto:dpo@empathy.co)

## 5. What rights do you have?

You can exercise the following rights according to the Regulation (EU) 2016/679 (General Data Protection Regulation):

- Right of access
- Right of rectification
- Right to erasure
- Right to object
- Right to data portability
- Right to restriction of processing
- Right to withdraw your consent

You can exercise the aforementioned rights to the Data Controller through the following channels:

- Email: [dpo@empathy.co](mailto:dpo@empathy.co)
- Post: Empathy Systems Corporation S.L.

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C/ Jimena Fernández de la Vega, 101.  
Parque Tecnológico, Gijón (Asturias), 33394.

Please note that according to the GDPR, the general deadline for replying is 1 month, with some exceptions where the deadline may be extended up to 2 months.

Users also have the right to file a complaint with the Spanish Data Protection Agency (AEPD). For more information, please consult the website: <https://www.aepd.es/es>

Furthermore, this privacy policy is governed by Spanish law.

## 6. Cookies

We do not use non-exempted cookies on our websites.

## 7. Changes to this Privacy Notice

This Privacy Notice was last updated on September 19, 2024