

Privacy Policy

REWARDWAVE SL ('WELPAY'), responsible for the processing of the data corresponding to <https://welpay.io/> (hereinafter the "Website"), guarantees the adoption of the necessary technical and organisational security measures to manage the user's personal data in accordance with the provisions of Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data (GDPR); Organic Law 3/2018, of 5 December, on the Protection of Personal Data and Guarantee of Digital Rights (LOPD-GDD); Royal Decree 1720/2007, of 21 December, approving the Regulation implementing Organic Law 15/1999, of 13 December, on the Protection of Personal Data (RDLOPD) and Law 34/2002, of 11 July, on Information Society Services and Electronic Commerce (LSSI-CE).

In this regard, the user will be asked for personal data when contacting WELPAY through the contact forms, which include the name, e-mail address and message they wish to send, as well as to purchase the Services offered on the Website.

In turn, articles and different pages on this site may include embedded content (e.g. videos, images, social media boxes, articles, etc.). Embedded content from other websites behaves in exactly the same way as if the visitor had visited the other site. These sites may collect data about you, use cookies, embed additional tracking from third parties, and monitor your interaction with that embedded content, including tracking your interaction with the embedded content if you have an account and are logged in to that site.

The personal data provided by the user will be added, managed and processed in WELPAY's files for the sole purpose of facilitating, fulfilling and managing the services contracted, answering queries, improving the quality, operation and navigation of the Website, carrying out commercial campaigns of possible interest (offers, promotions, discounts, etc.) and/or carrying out studies for statistical purposes.

The user's personal data will be treated under the strictest confidentiality, applying the technical and organisational security measures that are reasonably available according to the level of security appropriate to the risk of the data collected and in accordance with current legislation.

The legal basis for the processing of personal data is the existence of a legal or contractual relationship, as well as the fulfilment of legal obligations and measures linked to a contract (i.e. to provide the products and/or services you request and/or to provide you with any clarification).

The data will be processed for the duration of the contractual relationship between the parties. Once the contractual relationship has ended, the data will be blocked for the period during which any liability may arise from the processing or the contract. Once the legal limitation period has expired and these liabilities have expired, the data will be deleted.

In the event that the performance of the contract involves the processing of sensitive data, WELPAY undertakes to obtain the user's express and verifiable consent for the processing of such personal data, and the user is entitled to withdraw his/her consent at any time, when such consent has been granted for the processing of his/her data.

If the user does not wish to receive this commercial information, he/she can communicate this by e-mail to dpo@welpay.io and will be unsubscribed as a recipient of this type of information.

Users' personal data are processed at the registered office of the Data Controller, as well as at the offices of other entities to which the data may be provided in order to provide the contracted services requested. No data transfers are envisaged, except by legal obligation. WELPAY may also use service providers and data processors who access the data in order to provide the services. Some of

these providers may be located in countries outside the European Economic Area, specifically in the United States and/or the United Kingdom, and therefore there may be international data transfers. In this regard, the Standard Contractual Clauses have been implemented for these providers or the provider is certified under the Data Privacy Framework. Furthermore, in case they do not offer a level of personal data protection equivalent to that of the European Union, appropriate measures such as binding corporate rules or the conclusion of agreements in accordance with the standard clauses approved by the European Commission will be implemented.

We also inform you that your personal data will be shared for the purposes described in this Privacy Policy with the following categories of recipients:

- Our employees and/or authorized partners who assist and advise us on administration, products, legal matters, Customer Service Team and information systems, as well as those responsible for the maintenance of our network and hardware/software equipment;
- Airlines, hotels, car rental companies, insurance companies, tour operators, as well as those other parties to whom it is necessary to disclose your personal data in order to provide you with the requested services, who will act as autonomous data controllers. Please note that airlines are obliged, in accordance with new regulations introduced in the US and other countries, to allow customs and border authorities access to flight passenger data. For that reason, in certain situations, we may disclose the data collected on booked passengers to the competent authorities of the countries included in the Customer's travel itinerary if required by local law.
- Our third party service providers, who process your personal data on our behalf and under our instructions for the purposes described above, acting as data processors, such as those who provide us with IT and hosting services, call centre and customer support, analytics and administration services, legal advisors, etc.
- Payment providers and financial institutions (e.g. for fraud detection and prevention and chargeback purposes) acting as autonomous data controllers.
- Competent authorities where we are required to do so by law.
- Law enforcement authorities and third parties where this is necessary for us to enforce our terms of use and to protect and defend our rights or property or the rights or property of any third party.
- Third parties receiving the data (e.g. business consultants, professionals to provide due diligence services or assess the value and capabilities of the business) where necessary in connection with any sale of our business or its assets (in which case your data will be disclosed to our advisers and the advisers of any prospective purchaser and passed on to the new owners).
- Suppliers and/or third parties, referred to as "Welfare Partners", as well as other collaborators, organisations, business partners, merchants and/or establishments that provide services through the Website or that are linked to the services offered on it, who may access the data exclusively for the proper provision of said services.

The User may at any time exercise the following rights recognised in the GDPR and Organic Law 3/2018, of 5 December, on the Protection of Personal Data and guarantee of digital rights: Request access to their personal data or its rectification when it is inaccurate; request its deletion when, among other reasons, the data is no longer necessary for the purposes for which it was collected; request the limitation and/or opposition of the processing of their data in certain circumstances; request the portability of the data in the cases provided for in the regulations, as well as other rights recognised therein.

In order to request access, rectification, deletion, limitation of processing, portability and opposition of personal data, the user must send an e-mail with the subject 'Data Protection' to the box dpo@welpay.io in which he/she must specify the right he/she wishes to exercise and in respect of

which personal data and also indicate his/her name, surname, ID card number and address for the purposes of future notifications and prove his/her identity with a copy of an official identification document that legally identifies him/her.

In the event of disagreements with WELPAY in relation to the processing of data, the user may lodge a complaint with the Spanish Data Protection Agency (<https://www.aepd.es/>).

All private communications between WELPAY and its users or customers will be considered confidential and under no circumstances will they be transferred to third parties, except to the extent required for the provision of the contracted services. Similarly, in the event that the data is required by legal, administrative or judicial means, WELPAY shall be obliged to disclose the same, but always to the extent that the legislation and procedural rules permit.

WELPAY reserves the right to verify the information provided by the user. The personal data collected is purely for identification purposes. They will be stored for as long as is necessary for WELPAY to comply with its contractual, legal or regulatory obligations during the periods applicable under current legislation.

WELPAY reserves the right to modify this policy according to its own criteria, or motivated by a legislative, jurisprudential or doctrinal change of the Spanish Data Protection Agency, as well as industry practices.

In addition, this Privacy Policy may vary depending on legislative or self-regulatory requirements, so we advise you to visit it periodically to keep abreast of the latest changes or updates.

Changes or updates to this Privacy Policy will not be explicitly notified.

For the purposes detailed above, the person responsible for the processing of personal data is:

REWARDWAVE SL

Calle Gran Vía De Don Diego Lopez De Haro, 1,

48001, Bilbao (Bizkaia)

dpo@welpay.io

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