



CULMIA

Privacy
Policy

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Culmia Desarrollos Inmobiliarios, S.L.U. (hereinafter, “the manager”), with headquarters in Madrid, Calle Génova, 27, Company Tax No. B-67186999, is an integral manager of property assets and a member of a Property Group to which it provides its services.

The manager provides its services to the following property developers who are members of its Group:

Company	Company Tax No.	Company	Company Tax No.
Saturn Holdco S.A.U.	A88554100	Antea Activos Inmobiliarios S.L.U.	B88554324
Thrym Activos Inmobiliarios S.L.U.	B88554142	Redes Promotora 1 Ma, S.L.U.	B88093117
Erriap Activos Inmobiliarios S.L.U.	B88554159	Redes Promotora 2 Ma, S.L.U.	B88093174
Daphne Activos Inmobiliarios S.L.U.	B88554167	Redes Promotora 3 Ma, S.L.U.	B88093265
Dione Activos Inmobiliarios S.L.U.	B88554183	Redes Promotora 4 Ma, S.L.U.	B88093356
Fornjot Activos Inmobiliarios S.L.U.	B88554191	Redes Promotora 5 Ma, S.L.U.	B88093471
Greip Activos Inmobiliarios S.L.U.	B88554217	Redes Promotora 6 Ma, S.L.U.	B88145073
Hiperion Activos Inmobiliarios S.L.U.	B88554233	Redes Promotora 7 Ma, S.L.U.	B88145123
Loge Activos Inmobiliarios S.L.U.	B88554241	Redes Promotora 8 Ma, S.L.U.	B88145263
Kiviuq Activos Inmobiliarios S.L.U.	B88554258	Redes Promotora 9, S.L.U.	B88159728
Narvi Activos Inmobiliarios S.L.U.	B88554266	Redes 2 2018 Iberica 2 S.L.U.	B88160221
Polux Activos Inmobiliarios S.L.U.	B88554282	Redes 2 2018 Iberica 3 S.L.U.	B88160239
Siarnaq Activos Inmobiliarios S.L.U.	B88554290	Redes 2 Promotora Inversiones 2018 IV S.L.U.	B88160247
Tarqed Activos Inmobiliarios S.L.U.	B88554316	Redes 2 Promotora Inversiones 2018 V S.L.U.	B88160254
Titan Activos Inmobiliarios S.L.U.	B88554134		

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Basic Information on Data Protection

Controller and processor

In most cases, the manager processes your data as the data processor for the developers to which it provides its services, who are the controllers. In some cases, it may process your data as the controller.

You may contact the manager by email at protecciondedatos@culmia.com.

Main Purpose

Depending on the case, the data provided by the interested parties can be used to establish, maintain and manage the commercial, contractual or pre-contractual relationship, to process your requests for information, to send advertising and commercial information, to undertake studies concerning property preferences, subscriptions to the blog and guides, management of job applications and management of inquiries and complaints concerning possible breaches of the code of conduct.

Legitimate Basis

The basis that legitimizes data processing is the consent of the interested party, and/or the preparation and development of the contractual relationship, where appropriate.

Retention period

The personal data provided shall be retained for the time required to fulfil the purpose for which it has been gathered and to determine the possible liabilities that may arise from the purpose, in addition to the periods established in applicable regulations.

Potential recipients

Your data may be transmitted to companies in the business group to which the manager belongs and related to the property sector; other processors employed by the manager or the Developers for the management of the business relationship (in these cases the Developers being the controllers of your data, and the manager being the processor), and public bodies or authorities that require it pursuant to legal compliance or a court order.

Data protection rights

You can exercise your rights of access, rectification, deletion and portability of your data, of limitation and opposition to its processing by contacting the manager at its registered office or via the email address

protecciondedatos@culmia.com.

You also have the right if you see fit to contact the Spanish Data Protection Agency (<https://www.aepd.es>), in order to safeguard your rights.

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1. Introduction

In the Group, we are concerned about the protection of your privacy, and we process the personal data that you provide us only for the purposes that you have indicated. Below, we wish to explain how we collect this data and what we are going to do with it. The Group complies with the requirements of regulations on data protection in force, and therefore is aligned with Regulation (EU) 2016/679, of the European Parliament and of the Council, of April 27, 2016, regarding the protection of natural persons with regard to the processing of personal data and freedom of movement of that data, and Law 3/2018, of December 5, on Information Privacy and the guarantee of digital rights.

This privacy policy is applicable to the personal data of those interested in the promotions administered by the manager, customers or potential customers of the developers administered by the manager, and suppliers and parties interested in undertaking a study on property preferences. The data provided by users on this website shall be processed by the manager as the controller in order to undertake the study and may be transferred to the Property Developers of the property assets in the event that at the end of the process you display an interest in acquiring one of their properties.

2. Who is in charge of processing your data?

The manager shall process the data that you provide us, as controller, in order to undertake the study on property preferences. In addition, at the end of the process, if you are interested in our developments, we can provide your data as a potential customer to the developer who owns the property in which you are interested. In that case, the manager acts as processor on behalf of the developer.

Furthermore, if you give us your permission to send you information about other properties administered by the manager, your data will be administered by the owners of those properties.

3. Why do we request your data? What are we going to use it for and on what legitimate basis?

The data that we request from you is required for the purposes described in this Privacy Policy. Without it, we could not contact you in order to respond to your request for information or undertake those processes required in order to maintain a business relationship, or to complete the study on property preferences. That is why we always ask you to provide truthful data and that you update it if necessary.

The different purposes for which we process your data and the legitimate basis for data processing are listed below.

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- Processing information requests and management of the pre-contractual and contractual relationship. By providing your information in the contact areas provided on this website and accepting the privacy policy, you give your permission for us to contact you in order to provide information about products of interest to you. If your business relationship with us is ongoing, the data provided may be used to carry out the pre-contractual and contractual procedures required for the acquisition of properties in which you are interested.
- Management of the contractual and pre-contractual relationship with suppliers.
- Sending business communications by various means, including electronic ones, if you have expressly stated this by ticking the corresponding box. Business communications shall refer to assets administered by the manager and belonging to different developers, as well as related events in the property sector that may be of interest to you.
- Undertaking studies on property preferences. Owing to the nature of the study, we need to contact you in order for you to provide us with the information required. Furthermore, we shall require your data in order to send you the rewards we may give you if you help us with the study. For this purpose, you will have provided us yourself with your data via the website.
- The undertaking of other studies on consumer habits related to homes or others related to the property market.
- Management of subscriptions to published guides and the Blog.
- Include in the database of candidates the data of the curriculum vitae that you provide us to manage the selection processes in which your profile can fit.
- Management of queries and complaints regarding possible irregularities, breaches or behaviors contrary to ethics, legality or corporate rules.

4. To whom do we transfer your data?

In general, we do not transfer your data to third parties without your express permission. However, as we have stated in this policy, data is transferred to property owners in the event of you showing an interest in their developments.

Moreover, they may be transferred to suppliers required for the provision of those services listed, with whom the manager has a data processing agreement guaranteeing both confidentiality and appropriate security measures. If necessary, suppliers shall contact you directly but always within the framework of the purposes stated in this privacy policy.

If necessary, data shall be transferred to public authorities for the purpose of complying with the requirements of those authorities and applicable regulations.

No international data transfers are foreseen.

5. Data retention

Retention periods vary in terms of your relationship with us.

- We shall retain the contact details provided by you unless you choose not to receive business communications.
- In the event of entering into a pre-contractual or contractual relationship with us, we shall retain your data within the legal terms established by the applicable regulations. The data shall be kept duly blocked while liabilities may arise based on our contractual or pre-contractual relationship, as well as for purposes of compliance with other legal obligations.

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6. Data protection rights

These rights are:

Access: knowing what data of yours we are processing.

- Rectification or deletion: correct incorrect or inaccurate data or delete it.
- Portability of your data: request that we provide you with your data in a structured, commonly used and machine-readable format.
- Limitation: limit the purposes for which you have provided us with the data.
- Opposition to processing: withdraw permission provided or oppose the processing.

In order to exercise these rights, you should send a request to the manager's headquarters, or via the email address protecciondedatos@culmia.com, stating the right you wish to exercise and providing a copy of your identity document. To resolve any questions related to the processing of your personal data you can contact the Data Protection Officer of the manager via the email address protecciondedatos@culmia.com.

You also have the right if you see fit to contact the Spanish Data Protection Agency. (<https://www.aepd.es>) for the purpose of safeguarding your rights.