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Privacy Policy

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Culmia Desarrollos Inmobiliarios S.L.U. (hereinafter, "the manager" or "Culmia"), with Company Tax No. B-67186999, is an integral manager of real estate assets, which is part of a Real Estate Group (hereinafter "The Group"). The parent company of the Group is the company Saturn Holdco, S.A.U., with Company Tax No. A88554100, being the rest of the companies that are members of the Group, real estate developers. These are:

Company	Company Tax No.	Company	Company Tax No.
Erriap Activos Inmobiliarios S.L.U.	B88554159	Redes Promotora 3 Ma, S.L.U.	B88093265
Loge Activos Inmobiliarios S.L.U.	B88554241	Redes Promotora 4 Ma, S.L.U.	B88093356
Siarnaq Activos Inmobiliarios S.L.U.	B88554290	Redes Promotora 9 Ma, S.L.U.	B88159728
Tarqed Activos Inmobiliarios S.L.U.	B88554316	Redes 2 2018 Iberica 3 S.L.U.	B88160239
Titan Activos Inmobiliarios S.L.U.	B88554134	Redes 2 Promotora Inversiones 2018 IV S.L.U.	B88160247
Temis Activos Inmobiliarios, S.A.U.	A44790145	Redes 2 Promotora Inversiones 2018 V S.L.U.	B88160254
San José del Taller de Nazaret, S.L.	B28363257	Arveloq Investor S.L.U.	B88806393

All these companies have their registered office in Madrid, calle Génova 27, 2ª planta, 28004 Madrid.

Basic Information on Data Protection

Controller and processor

The manager provides services to different real estate developers and processes data of their customers and direct suppliers. These companies may or may not be part of its business group. The real estate developers are the Controllers and the manager is the Processor.

Additionally, Culmia in its own management of customers, suppliers and employees, treats personal data as responsible for this treatment (Controller).

Finally, Culmia processes customers and suppliers' personal data from the parent company (Saturn Holdco, S.A.U. which is the Controller) as data processor.

You can contact Culmia by email at protecciondedatos@culmia.com.

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Main Purpose	Data provided by the interested parties may be used, depending on the case, to: • process your requests for information • establish, maintain and manage the commercial, contractual or pre-contractual relationship with suppliers • send advertising and commercial information • send newsletters and newsletters • conduct studies on housing preferences, • Carry out studies related to consumption habits in homes • participate in surveys and quality studies • Manage blog subscriptions and download of guides, always with prior consent • manage job applications • participate in contests published on Culmia social networks • Handle inquiries and complaints regarding possible breaches of the Code of Conduct.
Legitimate Basis	The basis that legitimizes the treatment is the consent of the interested party, and / or the preparation and development of the contractual relationship, where appropriate or compliance with a legal obligation. Point 3 indicates the legitimizing basis of each treatment.
Retention period	**Personal** data provided will be kept for the time necessary to fulfill the purpose for which they are collected, respecting the periods established in the applicable regulations and determining the possible responsibilities that may arise.
Potential recipients	Your data may be transmitted to other data processors hired by the manager or Promoters for the management of the commercial relationship (in those cases, the Promoters being responsible for the processing of your data, and the manager its treatment manager); and to public bodies or authorities that so require under the protection of 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

At the Group we care about the protection of your privacy and treat the personal data you provide us only for the purposes you have indicated. Below, we want to explain how we collect that data and what we are going to do with it. The Group complies with the requirements of current data protection regulations and is therefore aligned with Regulation (EU) 2016/679, of the European Parliament and of the Council, of April 27, 2016, regarding the protection of data of natural persons with regard to the processing of personal data and the free movement of such data and with Organic Law 3/2018 of December 5, Protection of Personal Data and guarantee of digital rights.

This privacy policy is applicable to the personal data of those interested in the promotions of the Group's companies, customers or potential clients of the promoters managed by the manager, suppliers, those interested in carrying out a study on housing preferences, web users who wish to download guides or subscribe to the blog, participants in contests published on Culmia's social networks, candidates for a job, people who make a complaint for breach of the code of conduct, etc.

2. Who is in charge of processing your data?

Depending on the purpose for which you provide us with your data, the company responsible for the processing will be Culmia itself, the parent company of the business group to which Culmia belongs or the different real estate developers to which Culmia provides its services.

The real estate developers are responsible for the processing of their potential customers, customers and suppliers' personal data. In these cases, Culmia is their data processor.

The real estate developer (Data Controller) for the processing of each Real estate development is identified in the "Legal information" document, in each promotion at the "downloads" section.

Culmia, in its own management of customers, suppliers and employees, processes personal data as data controller.

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

The data we request is necessary for the purposes described in this Privacy Policy. Without them we would not be able to contact you to meet your request for information or make the necessary arrangements to maintain a business relationship, or to complete the process of studying housing preferences, send you the requested guides, participate in the contests organized by Culmia, manage your candidacy, etc. For this reason, we ask that you always provide us with truthful data and update it if necessary.

Below, we include the different purposes for which we are going to process your data and the bases that legitimize the treatment.

- Attention to requests for information and management of the pre-contractual and contractual relationship. By providing your data in the contact spaces enabled on this website or by telephone call and accepting the privacy policy, you consent to us contacting you to provide you with information about the products of your interest. In case of continuing the commercial relationship with us, the data provided may be used to carry out the pre-contractual and contractual procedures necessary for the acquisition of the properties of your interest, therefore, the legitimizing basis in this case is your consent.
- If you contact us by WhatsApp, we understand that you give us your consent so that we can contact you by WhatsApp. Likewise, we inform you that WhatsApp conversations to phone numbers identified as Culmia business account (WhatsApp Business,) may be recorded in our systems and will be kept until you exercise your right of opposition or cancellation. In the section "Data protection rights", we explain in detail how you can exercise your rights.
- Management of the contractual and pre-contractual relationship with suppliers. The data you provide will be used to assess your possible inclusion as a supplier of goods and services of the Group, as well as to control and manage the registration of suppliers. The legitimizing basis in this case is the contract or pre-contractual measures.
- Sending commercial communications by various means, including electronic, in case you have expressly stated it. These commercial communications will refer to the assets managed by Culmia, belonging to different developers, as well as events related to the real estate sector that may be of interest to you. The legitimizing basis for this treatment is your consent.
- Sending newsletters, newsletters and communications about our promotions if you give us your consent or if you are already a customer. The legitimizing basis for this treatment is your consent or the contract concluded.
- Conducting studies on housing preferences. Due to the nature of the study, we need to contact you to provide us with the required information. Additionally, we will need your data to send you the rewards that we can provide you if you help us with the study. To do this, you yourself will have provided us with your data through the web. The legitimizing basis for this treatment is your consent.
- Conducting other studies related to consumption habits in homes or others related to the real estate market. The legitimizing basis for this treatment is your consent.
- Participation in studies and quality surveys carried out by the Culmia Group. Participation in such surveys shall be voluntary. The legitimizing basis for this treatment is your consent.
- Management of subscriptions to the Blog and download of published guides. The legitimizing basis for this treatment is your consent.
- Include in the candidate database the data of the curriculum vitae that you provide us to manage the selection processes in which you register. The legitimizing basis for this treatment is your consent.
- Manage participation in contests and sweepstakes published on Culmia's social networks upon acceptance of its legal bases. The legitimizing basis is the consent to participate in said draw.
- Processing of inquiries and complaints regarding possible irregularities, breaches or behaviours contrary to ethics, legality or corporate rules. The legitimizing basis for this treatment is compliance with the legal obligation applicable to the company.

- Some data that you provide us through our websites or social networks may be used for marketing studies and commercial strategy in an anonymised form, such data will not allow any natural person to be identified.

  In the event that you provide us with data through a social network, you must first read the privacy policy of that network and make sure of the personal data you transmit to Culmia. In this case, the personal data provided will be used for the purpose you indicate, either directly or through the content of social networks.

4. To whom do we transfer your data?

In general, we do not pass on your data to third parties without your express consent. However, as we indicate in this policy, the data is managed by Culmia, being the Responsible for said data, the company that owns the assets, in case of showing interest in any of its promotions.

Likewise, they could be transmitted to the suppliers necessary for the provision of the indicated services, with whom the manager maintains a treatment order contract that guarantees both confidentiality and the relevant security measures. If necessary, you may be contacted directly by

these providers, but always within the framework of the purposes contemplated 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 depending on your relationship with us:

- We will keep your contact details you have provided us for five years unless you object to receiving marketing communications before that period.
- In case of entering into a pre-contractual or contractual relationship with us, we will keep them within the legal deadlines established by the applicable regulations. The data will be kept duly blocked as long as responsibilities can arise based on our contractual or pre-contractual relationship, as well as for the fulfilment of other legal obligations.
- The data provided for other purposes will be kept for the time established in the applicable legislation in each case.
- In all cases, the necessary deadlines will be kept to determining the possible responsibilities that may arise.

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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. 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.