

## SOCIAL MEDIA PRIVACY POLICY

### 1. USER INFORMATION

#### Who is responsible for processing your personal data?

GLOBAL HOLDINGS 2000 S.L. will be responsible for processing the personal data of individuals who have created a profile on any of its social media platforms. These data will be processed in accordance with the provisions of Regulation (EU) 2016/679 of April 27 (GDPR), Organic Law 3/2018 of December 5 (LOPDGDD), and the Law on Information Society Services and Electronic Commerce (LSSI). We provide the following information about this processing:

#### Why do we process your personal data?

Purpose of processing: To maintain a relationship between the USER and GLOBAL HOLDINGS 2000 S.L. (hereinafter referred to as the CONTROLLER), which may include the following operations:

- Handling requests and inquiries submitted to the controller.
- Informing about activities and events organized by the controller.
- Providing information about products or services offered by the controller.
- Interacting through official profiles.

When the CONTROLLER collects and processes personal data via its social media platforms, USERS will be informed about the purpose of data collection and their rights regarding their personal data. Personal data will be used only for the specified purposes and will be securely maintained.

**Legal Basis for Processing:** Explicit consent granted by the USER for the processing of their personal data for one or more specific purposes (Article 6.1.a GDPR). Additionally, USERS can access the privacy policies of the respective social networks at any time and configure their profile to ensure privacy.

#### How long will we retain your personal data?

**Data retention criteria:** The data will be retained until the USER revokes the consent given, as indicated in this privacy policy.

#### Who do we share your personal data with?

**Data disclosure:** Information provided by the USER through the CONTROLLER's social media, including their personal data, may be published, depending on the services the USER uses, and may thus become publicly available to other third-party users of the social media. From each social network profile, USERS can configure what information they want to make public in each case, view the permissions granted, delete them, or disable them, just like any third-party application they no longer wish to use. However, no personal data will be disclosed to third parties outside the social network unless it is essential for the development and execution of the processing purposes. In such cases, the CONTROLLER has signed confidentiality and data processing agreements with its communication service providers, as required by current privacy regulations.

#### What are your rights?

**Rights of the USER:** These rights can only be satisfied regarding information under the control of the CONTROLLER.

- Right to withdraw consent at any time.
- Right of access, rectification, data portability, or erasure of your data, and the right to restrict or object to its processing.
- Right to file a complaint with the supervisory authority ([www.aepd.es](http://www.aepd.es)) if you believe that the processing does not comply with current regulations. Contact details to exercise your rights: GLOBAL HOLDINGS 2000 S.L., Entença, 95 - 08015 Barcelona (Barcelona). E-mail: [legal@globalholdings.es](mailto:legal@globalholdings.es) The complete privacy policy is available at [prociency.com](http://prociency.com)

## 2. USE OF THE PROFILE

The CONTROLLER will carry out the following actions:

- Access to public information on the profile.
- Posting on the USER's profile of any information already published on the CONTROLLER's social network.
- Sending personal and individual messages through the social network's channels.
- Updates on the page's status that will be published on the USER's profile.

The USER can always control their connections, delete content they are no longer interested in, and restrict who they share their connections with. To do so, they must access their settings, where they will find various configuration options related to the privacy of the user profile on the social network.

## 3. POSTS

The purpose of social networks is to provide visibility and dissemination of the activities carried out by the CONTROLLER. These tools store personal data on the servers of the respective services and are governed by their own privacy policies. Once a USER becomes a follower or joins the social network of the CONTROLLER, they can post comments, links, images, photographs, or any other type of multimedia content supported by the network. In all cases, the USER must be the owner of the published content, have copyright and intellectual property rights, or have the consent of the affected third parties. Expressly prohibited are any publications on the social network, including texts, graphics, photos, videos, etc., that infringe or may infringe on morality, ethics, good taste, or decorum, and/or violate or breach intellectual or industrial property rights, image rights, or the law. Offensive, defamatory, illegal, or inappropriate comments or content will not be tolerated on the company's profiles. The Company reserves the right to delete such comments or content and to block the responsible users. In these cases, the CONTROLLER reserves the right to immediately remove the content, without prior notice, and may request the permanent blocking of the USER.

The CONTROLLER is not responsible for the content that USERS have freely published.

USERS should be aware that their posts will be visible to other users, making them primarily responsible for their own privacy. Images that may be published on the social network will not be stored in any file by the CONTROLLER but will remain on the social network.

## 4. DATA OF MINORS OR INDIVIDUALS WITH SPECIAL NEEDS

Reviewing and reading the terms of use and privacy policy of each social network at the time of registration is recommended, taking into account the different age requirements for registration. Furthermore, the CONTROLLER will be expressly exempt from any liability that may arise from the use of social networks by minors or individuals with special needs, whose access should be supervised and controlled by their legal representatives. The CONTROLLER reserves the right to modify this policy at any time. Changes will be communicated through our social media profiles and/or our website.