

**HUBTYPE**  
**PRIVACY POLICY WWW.HUBTYPE .COM**

**HUBTYPE** is committed to protecting and respecting your privacy. In this privacy policy ("Privacy Policy"), we explain how **HUBTYPE** collects, uses, discloses and protects the Personal Information you submit to us, including, for example, when accessing and using **HUBTYPE** websites or applying for job offerings.

Our Privacy Policy has been drafted to comply with applicable data privacy laws, in particular, the EU General Data Protection Regulation ("GDPR"). If the GDPR does not apply to you, not all terms of this Privacy Policy may be relevant to you.

As used in this Privacy Policy,

- (i) "**HUBTYPE**", "**we**," "**our**" and "**us**" means **METIS SOLUTIONS, S.L.** and, when applicable, its affiliates.
  
- (ii) "**Controller**" for the purposes of the GDPR, other data protection laws applicable in member states of the European Union and other provisions related to data protection is **METIS SOLUTIONS, S.L.**, C/ Roc Boronat 117, 2<sup>a</sup> planta. 08018 Barcelona.
  
- (iii) "**Personal Information**" generally has the same meaning as personal data or personal identifiable information (PII). Personal Information is defined in the data privacy laws applicable in your country. It includes any information relating to an identified or identifiable natural person. This means any individual who can be identified directly or indirectly by reference to an identifier such as name, identification number, location data, online identifiers (for example, IP addresses – if they can be used to identify you) or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person. Put simply, this includes data which either by itself or with other data held by us or available to us, can be used to identify you.

HUBTYPE is committed to the following key principles:

**PRINCIPLE 1. WE LIMIT HOW, AND WITH WHOM, WE SHARE YOUR PERSONAL INFORMATION.**

HUBTYPE will only share your Personal Information with others for the following purposes:

- a) at your request;
- b) to process or service a transaction or product authorized or requested by you; this may include sharing, when applicable, within the HUBTYPE group of entities;
- c) when required by law to disclose such information to appropriate authorities;
- d) to companies that assist us in marketing, recruiting, placement and servicing our products and services; for example, in order to support our information technology or to handle mailings on our behalf; and
- e) to our professional advisers.

**PRINCIPLE 2. PURPOSE AND LEGAL BASIS OF THE PROCESSING**

**Personal Information**

**Purpose**

**Legal Basis**

Information we receive from you when (i) you visit www.hubtype.com and other HUBTYPE websites and (ii) any other information you subsequently provide to us orally, in writing or through the internet (i.e. using the chatbots): this may include your full name, postal address, e-mail address, employer/business and professional information, job titles, telephone and fax numbers, demographic information, IP address

The Personal Information is used in providing the website and answering requests from you (e.g. if you choose to register to receive information about our products and services or if you enquire about these, we will use your Personal Information in order to respond).

The processing is necessary for the performance of a contract to which you are party or in order to take steps at the request of you prior to entering into a contract. Processing is necessary for the purposes of our legitimate interests, i.e. providing a website for information and use.

Name, address, e-mail address and other information about your transactions and communications with us.

The Personal Information is used to process or service a transaction or product authorized or requested by you.

The processing is necessary for the performance of a contract to which you are party or in order to take steps at the request of you prior to entering into a contract.

Name, address, e-mail address and other contact information

To periodically contact you to inform you of new products and/or services we provide or that we consider to be of interest to you.

Your consent

IP address and other information submitted by your browser

To diagnose any problems with our server and administer our website.

Processing is necessary for the purposes of our legitimate interests, i.e. providing a website for information and use.

Personal Information	Purpose	Legal Basis
Application data, including your name, address, CV, birthdate	Processing is required to enable us to administer the recruiting process, including the set-up of an electronic job applicant HR file, managing your application, organizing interviews. We may retain your Personal Information following your unsuccessful application so that we may contact you in case of future job vacancies. Your data may also be shared with other HUBTYPE group companies to consider your application for other job openings.	Primarily, the processing is necessary to take steps for entering into a contract with you. We also have a legitimate interest to (i) store your data for a period of <b>up to 2 years</b> following the conclusion of an unsuccessful application and/or (ii) to share it with the HUBTYPE group of entities and/or (iii) to retain and use your data as far as necessary for the establishment, exercise or defense of legal claims.
All of the above	For compliance with legal and regulatory requirements and corporate governance obligations.	Processing is necessary for compliance with legal obligations to which we are subject.

Where you wish to provide us with Personal Information about another person, including colleagues or the persons you act on behalf of, you must ensure that you have their prior permission to do this. You must also share with them a copy of this Privacy Policy as well as any other relevant privacy statements (see above) before you ask them for this permission.

We collect Personal Information for the purposes described above when you visit [www.hubtype.com](http://www.hubtype.com) and other HUBTYPE websites and from public sources, such as recruiting and business portals (i.e. [www.linkedin.com](http://www.linkedin.com)).

**PRINCIPLE 3. WE ESTABLISH SAFEGUARDS TO HELP ENSURE THE SECURITY AND CONFIDENTIALITY OF YOUR INFORMATION.**

HUBTYPE restricts access to your company’s information to our employees who need it to do their job. Employees with access to your information are required to strictly maintain the confidentiality of such information.

HUBTYPE maintains physical, electronic and procedural safeguards that comply with Industry standards to protect your company’s information. We routinely test our information systems and websites to help ensure that unauthorized access does not occur.

**PRINCIPLE 4. WE KEEP YOUR PERSONAL INFORMATION FOR AS LONG AS IT IS NECESSARY TO DO SO TO FULFIL THE PURPOSES FOR WHICH IT WAS COLLECTED AS DESCRIBED ABOVE.**

The criteria we use to determine data retention periods for Personal Information includes the following: (i) **Retention in case of queries:** We will retain it for a reasonable period after the relationship between us has ceased in case of queries from you; (ii) **Retention in case of claims:** We will retain it for the period in which you might legally bring claims against us; (iii) **Retention in accordance with legal and regulatory requirements:** We will consider whether we need to retain it after the period described in (ii) because of a legal or regulatory requirement, e.g. to comply with tax or fiscal duties; (iv) **Retention in case of job applications:**

If you applied for a job offering with HUBTYPE and have not been successful, your application data will be retained in our talent pool for a limited period as defined in Principle 2.

### **Give Us Your Feedback**

Our goal is to protect your privacy. To comment or help us improve, please contact us via email (hi@HUBTYPE.com) or telephone (+34) 634 50 57 76. You may also contact us via written letter at HUBTYPE's address listed above. We may ask you to provide a copy of your proof of identity.

If you consider that we are in breach of our obligations under data protection laws, you may lodge a complaint with the competent Data Protection Authority, which may be the supervisory authority in your country of residence, place of work or of an alleged infringement of data protection laws.

### **Changes to this Privacy Policy**

This privacy policy may be modified from time to time to comply with applicable laws or to conform to our current business practices. We will post any changes to this on our website and will endeavor to notify you via your contact email. When notifying such changes to you, we will also explain what the likely impact of those changes on you will be, if any. We encourage you to revisit the Privacy Statement that is posted on our web site from time to time to check for updates.

### **ADDITIONAL INFORMATION WE WANT YOU TO KNOW:**

**Transfers outside the EU/EEA.** We also transfer the Personal Information we process to countries outside the European Economic Area ("EEA") (e.g., when one of our service providers or equipment is based outside the EEA, such as for hosting your Personal Information). We have put in place adequate safeguards with respect to the protection of your privacy, fundamental rights and freedoms, and the exercise of your rights, e.g. we establish an adequate level of data protection, usually through EU Standard Contractual Clauses based on the EU commission's model clauses.

**Provision of Personal Information / Automated decision making.** Please note that the Personal Information we collect from you is necessary to providing the services and the website to you. Failure to provide such data may not enable us to provide our services to you or make our website accessible. We do not use automatic decision-making or profiling of individuals.

**Your Rights.** You have various rights under data privacy laws in your country. These may include (as relevant): the right to request access to the Personal Information we hold about you; the right to rectification including to require us to correct inaccurate Personal Information; the right to request restriction of processing concerning you or to object to processing of your Personal Information, the right to request the erasure of your Personal Information where it is no longer necessary for us to retain it; the right to data portability including to obtain Personal Information in a commonly used machine readable format in certain circumstances such as where our processing of it is based on a consent; the right object to automated decision making including profiling (if any) that has a legal or significant effect on you as an individual; and the right to withdraw your consent to any processing for which you have previously given that consent.

**Marketing Information.** With your consent, where relevant, we will keep your name, address and contact details (including telephone numbers and email addresses) in our databases and may from time to time use that information to make you aware of our related products and services as well as updates on developments in our industry sector generally which may be of interest to you. We may contact you in writing, by telephone or email for this. If at any time you decide that you do not want your contact details used for these purposes, you may object or revoke your consent for receiving marketing communications by following the instructions in the

relevant marketing communication (e.g., clicking on the “Unsubscribe” button) or by contacting us (see “Give Us Your Feedback” above).

**Security Statement.** We take reasonable precautions to protect your information. In particular, we implemented appropriate technical and organizational measures designed to ensure a level of security appropriate to the risk, including as appropriate: (a) pseudonymisation (such as where data is separated from direct identifiers so that linkage to an identity is not possible without additional information that is held separately) and encryption, (b) protecting the ongoing confidentiality, integrity, availability and resilience of systems and services used to process your Personal Information, (c) providing the ability to restore the availability and access to Personal Information in a timely manner in the event of a physical or technical incident; and (d) maintaining a process for regularly testing, assessing and evaluating the effectiveness of technical and organizational security measures. When you submit information to us through our website, your information is protected both online and offline. All data transferred to/from the HUBTYPE internal network, from/to an external entity, is encrypted to industry standards. Please keep in mind that messages you send to us by Internet e-mail may not be secure. We maintain appropriate physical, electronic and procedural safeguards to ensure the security, integrity and privacy of your personal information within our company. Only those employees who may require your information to perform a specific job are granted access to your organization’s identifiable information. Furthermore, all employees are kept up-to-date on our security and privacy practices.

**Our Use of Cookies and Analytic Tools.** HUBTYPE uses “cookies” and analytic tools as further described in our Cookie Policy.

**Third Party Websites.** Our websites and mobile apps may contain links to third-party websites. If you follow these links, you will exit our websites or mobile apps. This privacy policy does not apply to websites of third parties. HUBTYPE cannot accept liability for the use of your Personal Information by these third parties. Your use of these websites is at your own risk. For more information on how these third parties treat your Personal Information, please check their privacy policy (if available).