

PRIVACY AND DATA PROTECTION POLICY

As established in the current legislation, AX Solutions is committed to adopt the necessary technical and organizational measures, according to the level of security appropriate to the risk of the data collected.

Laws incorporated in this privacy policy

This privacy policy is adapted to Spanish and European regulations in force regarding the protection of personal data on the Internet. It respects the following rules:

- 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 the free circulation of such data (GRPD)
- The Organic Law 15/1999, of December 13, on the Protection of Personal Data (LOPD).
- Royal Decree 1720/2007, of December 21, which approves the Regulations for the development of Organic Law 15/1999, of December 13, on the Protection of Personal Data (RDLOPD).
- Law 34/2002, of July 11, on Services of the Information Society and Electronic Commerce (LSSI-CE).

Identity of the person responsible for the processing of personal data

The person responsible for the processing of personal data collected in AX Solutions is: AX SOLUTIONS, SL, provided with NIF: B-88000740 and registered in the Commercial Registry of Madrid with the following registry data: Volume 37.137, Book 0, folio 50, section 8, sheet M-662854, 1st registration, whose representative is: Arturo Rodríguez del Amo (hereinafter, also responsible for the treatment). Your contact information is as follows:

Address:

Calle Pollensa 2. Centro Empresarial Tartessos. Edificio Apolo

28290 Las Rozas, Madrid

Telephone: +34 91 603 0217

Email: info@visual-tools.com

Registration of Personal Data

The personal data collected by AX Solutions, through the forms extended on its pages, will be entered into an automated file under the responsibility of the Data Controller

Principles applicable to the processing of personal data

The treatment of the personal data of the User will be subject to the following principles set forth in article 5 of the GRPD:

- Principle of legality, loyalty and transparency: the consent of the User will always be required prior information.

- Principle of limitation of purpose: personal data will be collected for specific, explicit and legitimate purposes.
- Principle of minimization of data: the personal data collected will be only those strictly necessary in relation to the purposes for which they are treated.
- Principle of accuracy: personal data must be accurate and always updated.
- Principle of limitation of the term of conservation: the personal data will only be maintained in such a way that the identification of the User is allowed for the time necessary for the purposes of its treatment.
- Principle of integrity and confidentiality: personal data will be treated in a way that guarantees its security and confidentiality.
- Principle of proactive responsibility: the controller will be responsible for ensuring that the above principles are met.

Categories of personal data

The categories of data that are treated by AX Solutions are only identifying data. In no case are special categories of personal data treated in the sense of article 9 of the RGPD.

Legal basis for the treatment of personal data

The legal basis for the treatment of personal data is consent. AX Solutions undertakes to obtain the express and verifiable consent of the User for the processing of his personal data for one or several specific purposes.

The User shall have the right to withdraw his consent at any time. It will be as easy to withdraw the consent as it is to give it. As a rule, the withdrawal of consent will not condition the use of the Website.

On occasions when the User provides its information through forms to make inquiries, request information or for reasons related to the content of the Website, he will be informed as to the compulsory or optional nature of providing the requested information for the proper development of the operation performed.

Purposes of the personal data treatment

The personal data is collected and managed by AX Solutions to facilitate, expedite and fulfill the commitments established between the Website and the User or the maintenance of the relationship established in the forms completed or addressed for a request or inquiry.

Likewise, the data may be used for a commercial purpose of personalization, operational and statistical, and activities of the corporate purpose of AX Solutions, as well as for the extraction, storage of data and marketing studies to adapt the Content offered to the User, as well as how to improve the quality, operation and navigation of the Website.

When personal data are obtained, the User will be informed about the purpose or specific purposes of the treatment to which the personal data will be assigned; that is, the use or uses that will be given to the information collected.

Periods of retention of personal data

Personal data will only be retained for the minimum time necessary for the purposes of its processing or until the User requests its deletion.

Recipients of personal data

The personal data of the User will not be shared with third parties.

Secrecy and security of personal data

AX Solutions undertakes to adopt the necessary technical and organizational measures, according to the level of security appropriate to the risk of the data collected, so as to guarantee the security of personal data and to prevent destruction, loss or accidental alteration or illicit of personal data transmitted, conserved or otherwise processed, or unauthorized communication or access to said data.

The Website has an SSL certificate (Secure Socket Layer), which ensures that personal data is transmitted in a secure and confidential manner, as the data is transmitted between the server and the User, and in feedback, fully encrypted or encrypted.

However, because AX Solutions cannot guarantee the contestability of the Internet or the total absence of hackers or others who fraudulently access personal data, the Data Controller undertakes to notify the User without undue delay when a violation occurs. of the security of personal data that is likely to entail a high risk for the rights and freedoms of natural persons. Following the provisions of Article 4 of the GRPD, violation of the security of personal data means any breach of security that causes the destruction, loss or accidental or unlawful alteration of personal data transmitted, preserved or otherwise processed, or the unauthorized communication or access to said data.

Personal data will be treated as confidential by the person responsible for the processing, who undertakes to inform and guarantee through a legal or contractual obligation that such confidentiality is respected by its employees, associates, and any person to whom it is accessible. information.

Rights derived from the processing of personal data

The User has about AX Solutions and may, therefore, exercise the following rights recognized in the GRPD with the Responsible for the processing:

- Right of access: It is the right of the User to obtain confirmation of whether AX Solutions is treating their personal data or not, and if so, to obtain information about their specific personal data and the treatment that AX Solutions has made or performs, as well as, among other, of the information available on the origin of said data and the recipients of the communications made or anticipated thereof.
- Right to rectification: It is the right of the User to modify their personal data that prove to be inaccurate or, taking into account the purposes of the treatment, incomplete.
- Right of withdrawal ("the right to be forgotten"): It is the User's right, provided that the current legislation does not establish otherwise, to

obtain the deletion of their personal data when these are no longer necessary for the purposes for which they were collected or treated; the User has withdrawn his consent to the treatment and this does not have another legal basis; the User is opposed to the treatment and there is no other legitimate reason to continue with it; personal data have been treated illicitly; personal data should be deleted in compliance with a legal obligation; or the personal data have been obtained as a result of a direct offer of information society services to a child under 14 years of age. In addition to deleting the data, the Data Controller, taking into account the available technology and the cost of its application, must take reasonable measures to inform those responsible who are processing the personal data of the interested party's request to delete any link to that personal data.

- Right to limitation of treatment: It is the right of the User to limit the processing of their personal data. The User has the right to obtain the limitation of the treatment when he challenges the accuracy of his personal data; the treatment is illegal; The Person in charge of the treatment no longer needs the personal data, but the User needs it to make claims; and when the User has opposed the treatment.
- Right to data portability: In the event that the processing is carried out by automated means, the User shall be entitled to receive from the Data Controller their personal data in a structured format, commonly used and mechanically read, and to transmit them to another responsible for the treatment. Whenever technically possible, the Data Controller will transmit the data directly to that other person in charge.
- Right of opposition: It is the right of the User to not carry out the processing of their personal data or to cease the treatment of them by AX Solutions.
- Right not to be subject to a decision based solely on automated processing, including profiling: It is the right of the User not to be subject to an individualized decision based solely on the automated processing of their personal data, including the elaboration of profiles, existing unless the current legislation establishes the opposite.

Therefore, the User may exercise their rights by means of a written communication addressed to the Data Controller with the reference "GDPR-www.visual-tools.com", specifying:

- Name, last name of the User and a copy of the ID. In the cases in which the representation is admitted, it will also be necessary the identification by the same means of the person representing the User, as well as the document accrediting the representation. The photocopy of the ID may be substituted, by any other means valid in law that proves the identity.
- Request with the specific reasons for the request or information to which you want to access.
- Address to effect of notifications.
- Date and signature of the applicant.
- Any document that certifies the request that you formulate.

This application and any other attached document may be sent to the following address and / or email:

Address:

Calle Pollensa 2. Centro Empresarial Tartessos. Edificio Apolo

28290 Las Rozas, Madrid

email: info@visual-tools.com

Links to third-party websites

The Website may include hyperlinks or links that allow access to web pages of third parties other than AX Solutions, and therefore are not operated by AX Solutions. The owners of said websites will have their own data protection policies, being themselves, in each case, responsible for their own files and their own privacy practices.

Claims before the supervisory authority

In the event that the User considers that there is a problem or infringement of the current regulations in the way in which their personal data are being processed, they will have the right to effective judicial protection and to present a claim to a control authority, in particular, in the State in which he has his habitual residence, place of work or place of the alleged infringement. In the case of Spain, the control authority is the Spanish Agency for Data Protection (<http://www.agpd.es>).

Acceptance and changes in this privacy policy

It is necessary that the User has read and is satisfied with the conditions on the protection of personal data contained in this Privacy Policy, as well as to accept the processing of their personal data so that the Data Controller can proceed to the same in the form, during the deadlines and for the purposes indicated. The use of the Website implies the acceptance of this Privacy Policy.

AX Solutions reserves the right to modify its Privacy Policy, according to its own criteria, or motivated by a legislative, jurisprudential or doctrinal change of the Spanish Agency for Data Protection. Changes or updates to this Privacy Policy will be notified explicitly to the User.

This Privacy Policy was updated on May 21, 2018 to adapt to Regulation (EU) 2016/679 of the European Parliament and of the Council, of April 27, 2016, regarding the protection of individuals regarding the treatment of personal data and the free circulation of these data (GDPR).