

## **PRIVACY POLICY**

In compliance with the Personal Data Protection regulations and in accordance with 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 on the free movement of such data ("GDPR") and with the Organic Law 3/2018 of 5 December on the protection of personal data and guarantee of digital rights ("LOPDGDD"), POP CORNER NETWORK, S.L. (hereinafter, "**Go-PopUp**" or "**We**") provides the information on the processing of personal data of users of our App and/or Web (hereinafter, collectively referred to as the "**Platform**").

The users of our Platform are differentiated according to the relationship they have with us. On the one hand, we have individuals or legal entities that own a store (hereinafter, "**Brand**"), and on the other hand, we have individuals who access to view and participate (hereinafter, "**Consumer**") in the different functionalities provided in our Platform.

### **1. ¿Who is the Data Controller?**

<b>Identity:</b>	POP CORNER NETWORK, S.L.
<b>NIF:</b>	B-65735136.
<b>Postal address:</b>	c/: Pamplona, 88-90, Principal 1ª, Barcelona (ZIP:08018).
<b>E-mail:</b>	contact@shoplive.es

### **2. For what purpose and on what legal basis do we process personal data?**

If you are a Consumer, your personal data shall be processed to provide and manage our services in accordance with the General Conditions for ShopLive Platform Services; including but not limited to: the creation, setting and management of your user account and profile on our Platform, and where appropriate, blocking it and/or proceeding to its cancellation or removal; consuming and sharing content and interacting with other users and their content; sharing content between the Platform and a third party platform; contacting you for matters related to our Services; and assisting, managing and attending to any requests, comments and/or queries you make to us.

These purposes are performed on the basis of the execution of a contract to which you are a party by registering on our Platform and accepting the General Conditions for ShopLive Platform Services (Article 6.1.b) GDPR), and on the basis of your consent by submitting your request, comment and/or application to us, or deciding to share content between the Platform and a third-party platform (Article 6.1.a) GDPR).

Also, if you are a Consumer, provided that you allow us to do so, we collect information about your location when you use our services to provide you with features and personalize your experience on our Platform, such as showing you content from Brands near your location. Such processing is done on the basis of your consent by giving us permission to enable location on your device (Article 6.1.a) GDPR). We remind you that you can enable or disable the location of your device in your device settings.

If you are a Brand, your personal data shall be processed to provide and manage our services in accordance with the General Conditions for ShopLive Platform Services; including but not

limited to: assistance and management, billing, notifications related to the provision of services, the creation, setting and management of your user account and profile on our Platform, and where appropriate, blocking it and/or proceeding to its cancellation or removal; sharing content and interacting with other users and their content; sharing content between the Platform and a third party platform; contacting you for matters related to our Services, and assisting, managing and attending to possible requests, comments and/or queries you make to us.

These purposes are performed on the basis of the execution of a contract to which you are a party by registering on our Platform and accepting the General Conditions for ShopLive Platform Services (Article 6.1.b) GDPR), and on the basis of your consent by submitting your request, comment and/or application to us, or deciding to share content between the Platform and a third-party platform (Article 6.1.a) GDPR).

Regardless of whether you are a Brand or a Consumer, as a user of our Platform, your personal data shall be processed for the following purposes and on the following legal basis:

- Provided that we have a legal basis to do so, we shall keep you informed of new developments in our products and services through our newsletter or other means you have provided us with (telephone, email, SMS and/or messaging systems, among others).

**Legal basis:** Processing is carried out on the basis of consent (article 21.1 of Law 34/2002, of 11 July, services of the society of information and electronic commerce - “LSSICE”-, and Article 6.1.a) GDPR) and/or the legal authorization provided for in article 21.2 of the LSSICE.

- If you have consented, we may send you push notifications and/or local notifications.

**Legal basis:** The processing is carried out on the basis of consent to activate this functionality on your device (article 21.1 of LSSICE, and Article 6.1.a) GDPR). We remind you that you can manage and/or deactivate notifications by modifying the settings of your own device.

- Send you surveys related to the degree of satisfaction and operation of our Platform in order to improve the quality of our services.

**Legal basis:** The processing is carried out on the basis of the legitimate interest of Go-PopUp (Article 6.1.f) GDPR) to know the opinion of our users on the use of our Platform and to better understand the quality of our services and improve them. In the case of surveys of a commercial nature, the processing of data is carried out on the basis of consent, which Go-PopUp would ask you at the appropriate time (Article 6.1.a) GDPR).

- To comply with our legal obligations, possible judicial resolutions and other decisions determined by the authorities. Including the communication of personal data to law enforcement agencies, whenever we have suspicions or indications of an action that may constitute a criminal offense.

**Legal basis:** The processing of personal data for these purposes is carried out on the basis of compliance with the legal obligations of Go-PopUp (Article 6.1.c) GDPR).

- To ensure the security of our services, preventing and detecting possible security incidents, fraud and other crimes.

**Legal basis:** The processing is carried out for the satisfaction of our legitimate interest, which is to ensure and improve the security of our service (Article 6.1.f) GDPR).

- Perform statistical analysis and reports for the purpose of knowing the performance and needs of our services, in order to improve the development and offer new solutions.

**Legal basis:** The processing is carried out for the satisfaction of Go-PopUp's legitimate interest, which is to manage and improve our products and services (article 6.1.f) of the GDPR).

If you have not registered as a user on our Platform, but you contact us through the form provided to contact us and request information about our services or make inquiries, your personal information shall be processed in order to assist, manage and respond to any requests, comments and / or inquiries you make. The processing is done on your consent to contact us through the form provided or other contact channel enabled (Article 6.1.a) GDPR).

### **3. How long will we keep the personal data?**

We will process personal data as long as you keep your user active and once unsubscribed data shall be kept for the time necessary for the exercise or defense against possible claims and to comply with legal obligations that may have arisen.

The personal data processed on the basis of the consent given shall be kept until the withdrawal of consent, and once withdrawn, in some cases, we may keep them for the time necessary for the formulation, exercise or defense of claims, requirements, responsibilities and legal and/or contractual obligations, always being properly blocked.

### **4. To which recipients may the data be disclosed?**

Depending on the purposes for which the personal information is collected, personal data may be accessed by the following third parties:

- Public Administrations, Agencies and/or Competent Authorities and, the relevant law enforcement agencies, in assumptions that there is a requirement, a legal obligation or we consider that there are sufficient indications and/or suspicions to be in front of an illicit or criminal offense;
- Partners and third-party service providers who process information as data processors. With all our suppliers, the corresponding data processing agreement has been signed in accordance with the personal data protection regulations;
- Employees and/or collaborators authorized by Go-PopUp, always subject to the applicable data protection regulations;
- If you are a Consumer, your personal data (email address and interests you have included in your profile) may be communicated to the Brands using our Platform, provided that you have consented to share your personal information with the given Brand.

Remember that when you decide to follow a Store on our Platform, we will ask for your consent to share your personal information with the Brand whose Store you want to follow. Once you follow the Store, your personal data shall be processed by the Brand under its responsibility, and Go-PopUp is not responsible for the Brand's processing of your personal data. Please refer to the Brand's privacy policy for information about the processing of your personal data.

Go-PopUp does not transfer personal data to countries outside the European Economic Area. However, if it were to do so, we would ensure adequate protection of personal data by using the safeguards permitted by law, in particular the use of the standard contractual clauses approved by the European Commission.

## **5. What are the rights when you provide us personal data?**

If we process your data, you should know that your rights are:

- Right to request access to personal data: you can ask if we are processing your data, and if so, access them,
- Right to request rectification if the data is inaccurate, or complete the data we have incomplete.
- Right to request the erasure of your data.
- Right to request the restriction of processing: in this case, we will only keep your information for the exercise or defense of claims.
- Right to object to the processing: we will stop processing personal data, with the exception that they should continue to be processed for legitimate reasons or for the exercise or defense of possible claims.
- Right to data portability: if you want your data to be processed by another data controller, we will facilitate the transfer of your data to the new controller, where technically possible.
- Right not to be subject to a decision based solely on the automated processing of your personal data.

If you have given us your consent for any specific purpose, you may withdraw it at any time, without affecting the lawfulness of the processing based on the consent prior to the withdrawal.

To exercise your rights, you may contact us by sending an email to [shoplive@contact.es](mailto:shoplive@contact.es) or in writing to the postal address listed in paragraph 1 of this policy.

Whenever you consider it appropriate you can lodge a complaint with the competent authority, in this case, the Spanish Data Protection Agency (<https://www.aepd.es>).

## **6. How did we collect personal data?**

Personal data is collected during registration and when you complete your account and user profile on our Platform. Depending on the registration method available, you can provide us with personal data directly or if you register using an existing account of one of the available social networks, the personal data will be those communicated to us by the social network with your prior authorization, always in accordance with the privacy settings of your social network.

## **7. Additional information**

Child Use Policy. Our services are intended only for persons of legal age. In this sense, we do not deliberately collect information from minors. In any case, if parents or legal guardians believe that their children or legal guardians have submitted personal data to us, please contact us by sending an email to [shoplive@contact.es](mailto:shoplive@contact.es).

Personal data of third parties. If the personal data provided belong to a third party, you guarantee that you have informed such third party of the aspects contained in this Privacy Policy, and have obtained their consent to provide us with their data for the purposes indicated in this Policy.

Links. Our Platform may contain links to the websites of the various Brands using the Platform. Please note that we do not endorse the content or services of such websites, nor are we responsible for the privacy policies of such websites. We encourage you to be aware of and read the privacy policies of all linked sites you visit. Please note that this Privacy Policy applies only to data collected and/or processed by Go-PopUp.

Modifications. We will only use your personal information as set out in this document which is in force at the time, we collect your information. In the event that Go-PopUp makes a change to the processing of your information, you will be informed in a timely manner.

Please contact us. If at any time you feel that we have not complied with the provisions set forth in this Privacy Policy or have any questions regarding this Privacy Policy, please contact us by sending an email to [shoplive@contact.es](mailto:shoplive@contact.es). We will be happy to assist you.

**Date of update: 21/02/2022**