# SARANAC partners

# Website Privacy Policy and Cookies Policy

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## Website Privacy Policy and Cookies Policy

Saranac Partners Europe is committed to protecting your privacy and ensuring you are fully aware of the information we may hold on you and how that information might be used in the course of providing Services to you. We use cookies to give you the best possible experience on our website. This policy explains how we collect, and safeguard your personal data gathered when you visit our website <u>www.saranacpartners.com</u>

By visiting our website and allowing us to capture cookies you are agreeing to the policy as described below.

Data Controller is Saranac Partners Europe of C/ Hermosilla 11, planta 2ª - 28001 Madrid (Madrid).

Saranac has appointed a Data Protection Officer who can be contacted at <u>DPO@saranacpartners.com</u>

#### Application

This policy relates to:

- a. How we handle information received or collected about you as an individual through the Website,
- b. How we communicate with you as an individual,
- c. Information about cookies we use, and
- d. Your rights as an individual in respect to such information and communications.

It does not relate to information about companies held and processed by us.

#### Definitions

In this privacy policy references to:

- a. "we", "us" or "our" are to Saranac Partners Europe whose registered address is at C/ Hermosilla 11, planta 2ª - 28001 Madrid (Madrid)
- b. "the Website" are to <u>www.saranacpartners.com</u>

#### Information we collect

The information which we collect may include:

- a. Any personal details about you as an individual which you provide to us through forms on the Website and emails exchanged with us or any of its personnel, such as your name, address, telephone number, job title etc.
- b. Your preferences and use of email updates, as recorded by emails that we send you (if you elect to receive email updates on our products and offers).
- c. Your IP Address, a string of numbers unique to your computer that is recorded by our web server when you request any page or component of the Website. This information may be used to monitor your usage of the Website.
- d. Analytical and statistical information about your browsing and the use of our Website that we obtain through the cookies.

#### Use of your information

Any information about you as an individual which we collect from the Website will be used in accordance with the General Data Protection Regulation and other applicable laws for the following purposes:

- Website forms and emails exchanged with us: In this case we will process your personal data to attend to and manage any request you may send us and,
- 2. In certain cases we may use your email address to send you information about our products and services. If so you will be offered the option to opt out of receiving such e-mails.
- 3. Cookies

Your browser may be capable of being programmed to reject cookies, or to warn you before downloading cookies, and information regarding this may be found in your browser's 'help' facility

For a more detailed explanation of cookies please see: http://www.allaboutcookies.org/

Below is a table of all cookies on this website – their name, type and purpose:

Cookie Type	Cookie Name	Cookie Purpose
Google Analytics	_gat _ga	These cookies are used to collect information about how visitors use our site. We use the information to compile reports and to help us improve the site for you. The cookies collect information in an anonymous form, including the number of visitors to the site, where visitors have come to the site from and the pages they visited.

#### **Retention period**

In the case of requests, we will process your data for the time necessary to deal with and resolve the request you have made us, and in any case within a maximum period of 1 year we will proceed to delete it.

In the case of cookies, data may be processed as long as you maintain your consent for their installation and for the duration of its corresponding installation.

#### When we disclose your personal data

We may need to disclose your personal information to other companies for administrative purposes. We may use third parties to carry out certain activities, such as processing and sorting data, monitoring how customers use the Website and issuing our e-mails. Their use of the data is controlled by our contract with them, and they are only allowed to use the data strictly for the purpose we have stated e.g. the data is not used in connection with data from other companies and we are not tracking user behaviour outside our own sites.

For these purposes your details may be transferred outside the European Economic Area (EEA) and you consent to such transfer by using the Website. In this sense:

The third party cookies used on this website belong to Google located in the USA so their data processing involves an international transfer of data to a country that does not have a level of protection comparable to the European level. However, according to the information provided by Google, the company is adhered to the EU-US Data Privacy Framework (DPF). Through this link you can access the detail of the principles and obligations assumed by Google based on the adherence to this DPF:

https://www.dataprivacyframework.gov/s/participant-search/participant-detail? id=a2zt00000001L5AAI&status=Active0000001L5AAI&status=Active&hl=en\_US.

On the other hand, since August 2020 Google also has adequate safeguards for international data transfers based on the standard contractual clauses adopted by the European Commission, as well as enhanced measures also following the recommendations of the European Data Protection Board. If you want to know in detail the different documents, as well as the reinforced measures you can access the following link:

#### https://services.google.com/fh/files/misc/safeguards\_for\_international\_data\_transfers.pdf.

We will not sell or pass on your personal information to any other person, except a company within our group or in accordance with paragraphs above, or if we are required or permitted to do so by law.

#### **Other Websites**

This privacy policy only covers the Website. Any other websites which may be linked to by the Website may be subject to their own privacy policy, which may differ from ours and we are not responsible for the content provided on any third party web sites.

#### Data Protection rights

To exercise the rights of access, rectification, deletion, limitation, portability, objection, revocation of the consent granted to send alerts or other information, as well as any claim you may wish to file in relation to data protection, you may contact our Data Protection Officer at DPO@Saranacpartners.com.

To exercise your rights against Google, please refer to its privacy policy: <u>https://policies.google.com/privacy?hl=en-US</u>

Likewise, you may contact the Spanish Data Protection Agency, the competent supervisory authority, at https://www.aepd.es or Calle Jorge Juan, 6, 28001 Madrid.

#### More about your privacy

To find out more about how we protect the privacy of our Clients, see our Privacy Policy which you will also find available via our website.

#### **Contact Details**

Questions, comments and requests regarding this Cookies Policy are welcomed and should be addressed via email to <u>DPO@saranacpartners.com</u> or telephone: +34 919 545 130 and ask for the Data Controller