

PRIVACY POLICY

Last Updated: January 21, 2026

1. Data Controller

The entity responsible for the processing of your personal data (Data Controller) is:

- **Company Name:** Shark Software S.L.U.
- **Tax ID (NIF):** B22959654
- **Registered Address:** Marques de la Sonora 18, Torre de Benalgalbon, 29730, Malaga, Spain
- **Email for Privacy Matters:** privacy@aei.dev

2. Information We Collect

We collect minimal personal data necessary to provide our services and communicate with you. The categories of data we process are:

- **Identification Data:** Strictly your email address, as provided by you through our website forms.
- **Technical & Usage Data:** Information collected via cookies (e.g., Leadfeeder) regarding how you interact with our website, IP address, and browser data. Please refer to our Cookie Policy for detailed information on this tracking.

3. Purpose and Legal Basis for Processing

We process your data for the following specific purposes and legal bases:

Purpose	Description	Legal Basis (GDPR)
Marketing & Newsletter	To send you updates, news, and commercial information via email.	Consent (Art. 6.1.a GDPR): You provide this by clicking “Subscribe” and confirming via the Double Opt-In email.
CRM & Management	To manage our potential business relationship and organize contact details within our internal systems (Holded).	Legitimate Interest (Art. 6.1.f GDPR): Administrative management of business contacts.
Website Analytics	To analyze visitor behavior and identify potential B2B leads using Leadfeeder.	Consent (Art. 6.1.a GDPR): Managed via the Cookie Banner upon your arrival.

4. The Double Opt-In Process

We value your privacy and want to ensure you truly wish to hear from us. We utilize a Double Opt-In mechanism:

1. You enter your email on our Webflow form.
2. You receive an automatic email requesting confirmation.

3. **Important:** If you do not confirm your subscription by clicking the link in that email, your data is automatically erased from our systems within 48 hours.

5. Data Recipients (Third-Party Processors)

To operate our business, we share data with third-party service providers (Data Processors) who act on our behalf. We ensure they comply with data protection standards:

- **Webflow (USA):** Provides website hosting and form submission handling.
- **Brevo (France/EU):** Used for sending emails and managing marketing automation. Data is sent via webhook.
- **Holded (Spain/EU):** Used as our Customer Relationship Management (CRM) and ERP system.
- **Leadfeeder (Finland/EU/USA):** Used for B2B website analytics and visitor identification.

6. International Data Transfers

Some of our service providers, specifically Webflow, are located in the United States. We ensure that transfers of personal data to the U.S. are protected. Webflow participates in the EU-U.S. Data Privacy Framework (DPF), which ensures an adequate level of protection for personal data transferred from the EU to participating US companies.

7. Data Retention

We will keep your personal data only for as long as necessary:

- **Unconfirmed Subscriptions:** Deleted after 48 hours.
- **Confirmed Subscribers:** Kept until you withdraw your consent (unsubscribe) or request deletion.
- **CRM Data:** Kept for the duration of our business relationship or as required by legal obligations (e.g., tax/accounting laws for up to 6 years if a contract is signed).

8. Your Rights

Under the GDPR and Spanish Law (LOPDGDD), you have the following rights regarding your data:

- **Access:** Request a copy of the data we hold about you.
- **Rectification:** Correct any inaccurate or incomplete data.
- **Erasure (Right to be Forgotten):** Request we delete your data (e.g., unsubscribe).
- **Objection:** Object to the processing of your data for marketing purposes.
- **Restriction:** Request we suspend processing your data in certain scenarios.
- **Portability:** Receive your data in a structured, commonly used format.

To exercise any of these rights, please contact us at privacy@aei.dev. If you believe your rights have been violated, you have the right to lodge a complaint with the Spanish Data Protection Agency (AEPD) at www.aepd.es.