

Data controller

Triciclo Tech, S.L. with NIF B27695121 domiciled in Hermosilla 48, Piso 1, C.P. 28001, Madrid, Spain (hereinafter the “Company” and/or “Data Controller”), is responsible for the processing of the data of the interested parties and guarantees their processing in accordance with the provisions of the General Data Protection Regulation (“GDPR”) and any other applicable legislation.

The interested party may contact the Company to resolve any doubts related to the processing of their personal data through privacy@triciclotech.com.

Purposes of Data Processing

In compliance with the requirements of Article 6 of the GDPR, and according with this policy (hereinafter the “Policy”) the Data Controller processes the personal data collected to channel, manage and optimize the commercial and industrial operations of its corporate purpose in the technology and communications sector. The collection and processing of the user's personal data will be carried out for the following purposes:

Professional or commercial contact: Processing aimed at commercial cooperation, initial contact, market research and the maintenance of institutional relations with representatives or employees of legal entities.

Management of the contractual relationship: Processing covered by the management, development and fulfilment of the commercial or pre-contractual relationship formalized between the parties.

Attention and support: Treatment aimed at resolving queries and incidents related to trade agreements.

Compliance with legal and regulatory obligations: Mandatory treatment for the correct compliance with current tax, accounting, commercial and corporate obligations.

E-commerce B2C management: Processing aimed at managing purchases, logistical shipping, billing, and post-sale support for individual consumers through digital marketplaces.

Origin of Contact Data

In the development of our business operations personal data can be collected through the following ways depending on the channel:

a) B2B and professional channel:

1. Directly from the data subject: Information voluntarily provided by the user through our registration forms, demo requests, business meetings, attendance at industry events, or direct corporate communications.
2. Third-party sources and professional environments: Data obtained legitimately through third-party platforms under corporate license, commercial prospecting platforms, as well as public information available on corporate profiles and social networks of a strictly professional nature.

The data processed under this modality are limited exclusively to corporate professional contact information, with the sole purpose of establishing commercial relations at an institutional level.

b) B2C and E-commerce channel:

1. Indirectly through digital marketplaces: Data provided by platforms strictly necessary to process and deliver consumer orders.

Data Retention

The Data Controller will keep the personal data only for the period strictly necessary to comply with the purposes described in this Policy, or until the user exercises their right of deletion or opposition.

Data Blocking Protocol: Once the commercial relationship or the purpose that motivated the data processing ends, the data will not be deleted immediately. It will be technically blocked in accordance with the guidelines of the Agencia Española de Protección de Datos (AEPD) and applicable international legislation.

Legal and Tax obligations: During the blocking period, the data will remain restricted and available exclusively to public administrations, judges, and courts to fulfill legal, corporate and tax obligations.

Definitive Deletion: The data will be permanently and securely deleted once the applicable legal limitation periods and liability windows have fully elapsed.

Recipients and International Data Transfers

The Company adopts strict minimization criteria with respect to the communication of personal data to third parties. Personal data will not be sold, rented or commercially transferred under any circumstances. They may only be shared with:

Data processors: Strategic providers of technological services necessary for the provision of services and the commercial management of the Company.

Logistics and transport operators: Third party companies responsible for the physical for the physical delivery of products to B2C buyers.

Compliance and Legal Obligation: Public bodies, government authorities and judicial bodies, in compliance with the national and international regulations applicable to the company.

In the event that international data transfers are required to third countries that do not offer a level of protection equivalent to that of the GDPR, the Company will shield such operations by means of contractual clauses that guarantee legal certainty and confidentiality of the information.

Rights of the data subject

In accordance with the European regulatory framework, the data subject has control over their personal data and may exercise the following rights before the Company free of charge:

Access: Confirm whether the Company is processing the personal data and, if so, obtain specific details about such processing.

Rectification: Modify or correct any data that is inaccurate, incomplete or outdated.

Deletion (Rights to be Forgotten): Request the deletion of the personal data when, among other reasons, they are no longer necessary for the purposes for which they were collected.

Limitation of Processing: Temporarily restrict the scope of processing in a technical manner under certain legal circumstances.

Portability: Receive the personal data in a structured, commonly used and machine-readable format, or request its direct transmission to another data controller if technically feasible.

Opposition: Object to the processing of the personal data based on the Company's legitimate interest, including business-to-business commercial prospecting.

The exercise of these rights may be exercised through written communication addressed to the email address privacy@triciclo.tech, accrediting the identity of the applicant through the appropriate legal mechanisms.

The Company may amend, terminate or otherwise modify this Policy at any time and from time to time.

This Policy was approved by the CEO of the Company on June 1st, 2026.