

POLÍTICA

WEB PRIVACY POLICY

ADARA VENTURES, SGEIC, S.A.

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1. PARTY RESPONSIBLE FOR THE WEBSITE

This website is the responsibility of the following companies:

- Adara Venture Partners III S.à.r.l., a company incorporated in Luxembourg, established at 15 Boulevard F.W. Raiffeisen, L-2411 Luxembourg, registered in the Trade and Companies Register of Luxembourg under number B270576.
- Adara Ventures Partners II S.à.r.l, a company incorporated in Luxembourg, established at 15 Boulevard F.W. Raiffeisen, L-2411 Luxembourg, registered in the Trade and Companies Register of Luxembourg under number B201937.
- Adara Advisors, S.L., a company incorporated in Spain, established at Calle Jose Abascal, 58 - 4ºD, 28003 Madrid, Spain, registered in the Commercial Registry of Madrid under number M-611636.
- Adara Ventures S.G.E.I.C., S.A., a company incorporated in Spain, established at Calle Jose Abascal, 58 - 4ºD, 28003 Madrid, Spain, registered in the Commercial Registry of Madrid under number M-645218.

These companies will be considered as independent Data Controllers, according to the legislation in force on data protection, each one in relation to the processing of personal data that they carry out.

Each company process the personal data collected by them or transferred from the other companies.

All these companies are hereinafter referred to as "ADARA".

For any request, you can reach us at gdpr@adara.vc

2. MOTIVATION

ADARA respects the privacy rights of its Users and acknowledges the importance of protection of the personal data of its Users.

This document sets out to inform Users of the website concerning the processing of personal data on this website.

3. PROCESSING OF PERSONAL DATA

3.1 Website forms

ADARA has the following forms on its website through which personal data are collected.

3.1.1 Type form to submit Investment Pitches

ADARA shall process the data furnished through the type form to address the investment request.

Legal basis: The legal basis legitimising the processing is the need to manage the transaction and the legitimate interest of ADARA.

Conservation period: Data shall be processed for the period necessary to resolve the user's contact request and, thereafter, for the period required by applicable law.

Mandatory data shall be identified as such whenever they are requested. Refusal to furnish this information will prevent ADARA from processing the request.

3.1.2 Registration and attendance to events organised by ADARA

ADARA shall process the data provided through the corresponding form for the purpose of managing your registration and attendance to the event.

Legal basis: The legal basis legitimising this processing is your consent expressed at the time of registration.

Conservation period: Your data will be processed until the event has taken place and concluded, and thereafter for the period required by applicable law.

3.1.3 Newsletter sign up form

ADARA shall process the data provided through the subscription form in order to send you the newsletter and other communications about ADARA's activities.

Legal basis: The legal basis legitimising this processing is your consent expressed at the time of subscription.

Conservation period: The data will be processed indefinitely until you revoke your consent or request deletion.

3.2 Cookies and similar

ADARA uses cookies and other similar data storage and retrieval mechanisms on terminal equipment ("cookies") to improve the browsing experience and to analyse the use of the website.

Cookies are files that are downloaded to the User's browser and can be read later by ADARA. In this regard, ADARA uses Google Analytics to measure and analyse the browsing of Users on the website.

For more information about the cookies used on this website, please refer to our Cookie Policy: <https://www.adara.vc/cookie-policy>

However, it is not possible to find out the identity of the User from the cookies used by ADARA, unless the User has previously registered on the website.

4. RECIPIENTS OF DATA

ADARA does not disclose this information to any third parties other than ADARA entities unless it is legally required to do so or the User has given prior consent.

In addition, for the provision of services by ADARA, we inform you that the data shared with us will be communicated to our service providers, who process the data on our behalf as data processors.

5. USER'S RIGHTS AND HOW TO EXERCISE THEM

Data protection regulations guarantee Users the following rights:

- Access: This informs the User as to which information is held, where it was obtained, who it has been shared with and for what purpose.
- Rectification: This enables the User to rectify any erroneous data or data that are no longer current.
- Erasure: This enables the User to stop the processing of his/her data.
- Opposition: This enables the User to stop his/her data being used for a specific purpose.
- Limitation: This enables the User to restrict the processing of his/her data, albeit in such a way that they are kept for the exercise or defence of potential claims.

- Portability: This enables the User to obtain a copy of his/her data in electronic format and, in certain circumstances, to have it transferred to another data controller.
- Withdrawal of consent: This enables the User to withdraw any consent he/she may have granted to process his/her data.

Users are informed that they may exercise these rights, and withdraw any consent they may have granted, by sending a written request to the following addresses:

- For Adara Venture Partners III S.à.r.l. and Adara Ventures Partners II S.à.r.l.: by email to dpo@adara.vc or by post to 15 Boulevard F.W. Raiffeisen, L-2411 Luxembourg. Users may also file a complaint with the Luxembourg data protection authority (CNPD): <https://cnpd.public.lu/en.html>
- For Adara Advisors, S.L. and Adara Ventures S.G.E.I.C., S.A.: by email to dpo@adara.vc or by post to Calle Jose Abascal, 58 - 4ºD, 28003 Madrid, Spain. Users may also file a complaint with the Spanish data protection authority (AEPD): <http://www.aepd.es>

6. SENDING OF COMMERCIAL COMMUNICATIONS (MAILCHIMP)

ADARA informs the user that the commercial communications requested by the user or if the user has not opposed to receiving them, will be sent through the tool Mailchimp, provided by The Rocket Science Group, LLC, 675 Ponce de Leon Ave NE, Suite 5000, Atlanta, GA 30308 USA.

The tool used for sending commercial communications by e-mail will include links and tiny, transparent images (web beacons) that allow ADARA to know if the user has opened the e-mail and which links they have clicked on, in order to improve the content of future communications.

In each communication, the user may oppose to receive this type of information through the specific link that will be included for this purpose.

7. DATA OF THIRD PARTIES FURNISHED BY THE USER

In the event the user furnishes personal data of third parties for any reason, he/she guarantees that such third parties have been informed of and have given their consent to the terms of this Privacy Policy.

If any liabilities arise due to non-compliance with these conditions by the user, he/she must take responsibility for such liabilities.

8. SECURITY MEASURES

ADARA guarantees that it has adopted and applied the necessary technical and organisational measures to guarantee the security of the personal data provided and to prevent its alteration, loss, unauthorised processing or access, taking into account the state of the technology, the nature of the data stored and the risks to which they are exposed.

However, users must be aware that security measures on Internet are not impregnable.

9. FURTHER INFORMATION

If users have any queries concerning the information in our Privacy Policy, they may send an e-mail to: gdpr@adara.vc