

PRIVACY AND DATA PROTECTION POLICY

1. INTRODUCTION

The company holding the Silverspoon Global domain, S.L. (hereinafter, SILVERSPoon), with registered office at Carrer Aguilar 34 (08032 Barcelona, Spain) and Tax Identification Number (NIF) B70818844.

The information or personal data you provide to us will be processed in accordance with the provisions established in this Privacy Policy and Data Protection Information Policy.

By using this website, you consent to the processing of such information and data, and declare that all information or data you provide is truthful and corresponds to reality.

Every time you use this website, the Privacy Policy in force at that time shall apply. You should review this text to ensure that you agree with it.

SILVERSPoon undertakes to comply with regulations concerning the protection of personal data and to respect the privacy of Users. Our objective is to provide the best possible service to the User, and for this purpose it is necessary to have access to their data.

2. DATA PROTECTION – LOPD

LEGAL BASIS. The processing of your personal information is carried out on the basis of your consent when browsing or providing information through the contact form, the performance of a contract in force between the parties, compliance with a legal obligation, or the legitimate interest of SILVERSPoon.

We recommend that you, as a User, read this Privacy Policy carefully and in its entirety and use it to make informed decisions.

By using the Site, you consent to the collection, storage, use, disclosure and other uses of your personal information, as described in this Policy.

We recommend that you, as a User, read this Privacy Policy carefully and in its entirety and use it to make informed decisions.

If you do not provide the data necessary for these purposes, it will not be possible to provide you with the services. The data will be retained for as long as the relationship is maintained and deletion is not requested, and in any case in accordance with the applicable statutory limitation periods.

RECORD OF PROCESSING ACTIVITIES. In accordance with Organic Law 3/2018 on the Protection of Personal Data, and Articles 12 to 14 of the European General Data Protection Regulation 2016/679, we inform you that the personal data provided to this company, whether provided by the data subject or by a person authorised by them, and with your express consent, will be incorporated into Records of Processing Activities (RAT), as necessary for the services we offer.

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PURPOSE. Our main activity is the WHOLESALE TRADE OF FISH, SEAFOOD AND OTHER FOOD PRODUCTS, and therefore the processing of personal data that we carry out regarding the data you provide will be aimed at managing this activity. The information provided through the contact form, or where applicable during user registration, is understood to have been truthfully provided by you and only the information that is adequate, relevant and not excessive will be collected in order to assist you as a customer and correctly provide the products or services contracted. This also includes, where you have given your express consent through the contact form, managing subscription lists, follow-ups, sending newsletters, promotions and special offers. Likewise, to moderate and respond to comments from users of our website.

Other purposes for which we may process your personal data:

- To offer you our products, including personalised visualisation of our Site.
- To store and process such information on our behalf.
- To display advertisements to you and help us evaluate the success of our advertising campaigns, as well as assist us in retargeting our services.
- To provide you with commercial offers and promotional material related to our site and our services.
- To conduct research, technical diagnostics or analysis.

RETENTION OF INFORMATION. We will retain your personal information for as long as necessary to provide our online sales services, as well as to comply with our legal obligations, resolve disputes and implement and enforce our policies. Under applicable legislation, we will retain records containing customers' personal information, communications and any other type of information required by applicable laws and regulations.

Therefore, once the personal data provided is no longer necessary, and without failing to comply with other legal requirements, it will be cancelled from our records and the media containing the personal data provided will be destroyed or returned to the data subject, as applicable. Copies of such information will not be retained.

We may rectify, restore or delete information that is not accurate at any time and according to our own criteria.

COMMERCIAL COMMUNICATIONS. In relation to these services, we inform you that, if you expressly consent to this through our contact form, or after establishing a commercial relationship with us, you authorise us to send you commercial communications regarding products similar to those in which you have expressed interest, by email or any other equivalent electronic means of communication, as well as by telephone calls. You may change your preferences regarding the receipt of such commercial communications by contacting: legal@silverspoonglobal.es

DISCLOSURE. Your data will only be used for the purposes indicated above and will not be disclosed to third parties, except for communications to Authorities, Organisations or Offices of Public Administrations that are consented to by you or by a person authorised by you for the proper fulfilment of obligations arising from the contracted services, or that are required or authorised by law, and always in accordance with the provisions of our Data Protection Information Policy published on our website.

We may communicate the information to our data processors, such as providers of tax and employment services, consultancy services, IT services and similar services.

We do not carry out International Transfers of Data, and none are currently planned for the future. In the event of any change, we will expressly inform you.

EXERCISE OF RIGHTS. If you wish to exercise your rights of access, rectification, cancellation, portability, erasure, restriction or objection, you may do so by contacting the following email address in writing:

niko@silverspoonglobal.es

Likewise, for any questions regarding Data Protection, you may contact the Spanish Data Protection Agency:

www.aepd.es

CONFIDENTIALITY. SILVERSPOON guarantees the confidentiality of the personal data contained in its RAT and will adopt the regulatory measures necessary to prevent, as far as possible, its alteration, loss, processing or unauthorised access. Once the data is no longer necessary, it will be cancelled and the media containing the personal data provided will be destroyed or returned to the data subject, as applicable, without retaining copies of such information.

The database is securely located on Google Drive, and SILVERSPOON undertakes, when using the personal data collected in the Records of Processing Activities, to respect its confidentiality and use it in accordance with its purpose, as well as to fulfil its obligation to safeguard it and adopt all measures necessary to prevent alteration, loss, processing or unauthorised access to personal data.

MINORS. We are aware of and particularly sensitive to the importance of protecting children's privacy, especially in an online environment. We do not knowingly collect any type of personal information from minors. If a parent or legal guardian becomes aware that their child/children have provided personal information without their consent, they should contact us.

UPDATES. We reserve the right to modify or periodically review the Privacy Policy. Any changes will become effective when the revised or modified Privacy Policy is displayed. Your continued use of the Platform after notification of such changes made on our website constitutes your knowledge and consent to such modifications to the Privacy Policy, as well as your acceptance of the terms of such modifications.

INFORMATION PROTECTION. We pay particular attention to the implementation and maintenance of the security of both the website and your information. For example, we use service-generation procedures and standard policies to ensure the security of the information we collect and store, as well as to prevent its unauthorised use. We also require all third parties to apply similar security requirements in accordance with this Privacy Policy and conduct audits to verify our procedures.

Although we implement reasonable measures to secure the information, we cannot be held responsible for the actions of anyone who gains unauthorised access to or misuses our site, and we provide no express, implied or other guarantee that would prevent such access.

Therefore, these are OUR COMMITMENTS:

1. The information will not be used for purposes incompatible with those for which you provided it. If it were to be used for an incompatible purpose, you will be provided with information and your consent will be requested.
2. We will not use your personal data for the purpose of making decisions based exclusively on the automated processing of your data that may produce any legal effect, unless this is necessary for entering into a contract, you explicitly consent to it, or it is authorised by law.
3. We guarantee that we respect the legally established conditions of use and may develop tools and algorithms that help the website guarantee the confidentiality of the data it collects.
4. Personal data is usually collected through various channels, in paper or electronic format. If we receive information that may originate from third parties, we will inform you in the first communication or within a maximum period of one month.
5. In order to offer you products and services according to your interests, we may create a commercial profile based on such information.
6. All your information will be archived on our servers and will form part of our Records of Processing Activities.

3. LAW ON INFORMATION SOCIETY SERVICES AND ELECTRONIC COMMERCE

In compliance with the information requirements established by the LSSI-CE, we provide you with the following information:

- Company name: Silverspoon Global, S.L.
- Tax Identification Number (CIF): B70818844
- Telephone: +34600 574 833
- Registered office: Carrer Aguilar 34, 08032 Barcelona, Spain
- Email: legal@silverspoonglobal.es