

Privacy Policy

Data CONTROLLER

Company Name: CVSTOM Co

Address: CVSTOM Co, 999 Sutter Street, San Francisco, CA 94109

Telephone: 415-653-3087

Website: www.smile2impress.com

E-mail: gdpr@smile2impress.com

Data Protection Officer:

Xavier Saula Adell. Calle Pau Claris, 154, 2º 2ª. 08009, Barcelona. Web: www.aurisadvocats.com. E-Mail: xavi@aurisadvocats.com.

CVSTOM Co, as the Data Controller for this Website, informs you that we have implemented the measures of necessary security, of technical and organizational nature, to guarantee and protect the confidentiality, integrity and availability of all entered data.

Purpose of personal data processing

Your personal data will only be used for the following purposes:

- To carry out the necessary commercial and administrative procedures with Web Users;
- To send you commercial information by email, fax, SMS, MMS, social media or any other form of electronic or communication. Whenever the user has given express consent to the sending by subscribing to our NEWSLETTER.
- To respond to queries and/or provide information requested by the User;
- To manage User interaction in our Social Media platforms.
- To carry out the provision of services and/or products contracted or subscribed to by the User
- To use your data to contact you, both electronically and non-electronically, to obtain your opinion about the service provided and,
- To notify you about changes, important developments of the privacy policy, legal notices or cookies policy.
- Analysis of profiles and usability may be carried out.

· Client and/or supplier's data will be processed, within the contractual relationship that links them with the person in charge, in compliance with the administrative, fiscal, accounting, and working obligations that are necessary under the current legislation.

You can revoke your consent at any time by sending a letter with the subject "UNSUBSCRIBE" to gdpr@smile2impress.com

CVSTOM Co does not partake in SPAM practices, therefore, it does not send commercial emails that have not been previously requested or authorized by the User. Consequently, in all the communications that you will receive from the provider, the User has the possibility of cancelling his or her express consent to receive our communications.

We will not use your personal data for any other purpose than those described except by legal obligation or judicial requirements.

You can opt out of receiving our marketing emails. To stop receiving our promotional emails follow the instructions in any promotional message you get from us. Even if you opt out of getting marketing messages, we will still send you transactional messages. These include responses to your questions.

You can control cookies and tracking tools. Your browser may give you the ability to control cookies or other tracking tools. How you do so, depends on the type of tool. Certain browsers can be set to reject browser cookies. To control flash cookies, which we may use on certain websites from time to time, you can go to <http://www.aboutads.info/choices/>. Why? Because flash cookies cannot be controlled through your browser settings.

Our Do Not Track Policy: Some browsers have "do not track" features that allow you to tell a website not to track you. These features are not all uniform. We do not currently respond to those signals. If you block cookies, certain features on our sites may not work. If you block or reject cookies, not all of the tracking described here will stop.

You can control tools on your mobile devices. For example, you can turn off the Bluetooth, GPS locator, push notifications or your advertising ID in your phone settings.

Data conservation periods

Data will be kept during all the duration of the commercial relationship unless stated otherwise by the exercise of the right to access, rectification, erasure, restriction, portability or to withdraw consent. Nevertheless, we will keep specific personal data during the maximum 2-year term by legal imposition to respond to the Authority when required for legal prosecution purposes regarding unlawful web usage.

Lawfulness of personal data processing

- a) Contractual performance
- b) Consent of the data subject
- c) Compliance with legal duties
- d) Legitimate interest: sending of our own advertising

Communications

Any communication sent will be incorporated into the Information Systems of CVSTOM Co. By accepting these conditions, terms, and policies, the User expressly consents to CVSTOM Co carrying out the following activities and/or actions, unless the User indicates otherwise:

- The sending of commercial and/or promotional communications by any means enabled informing the Users of the activities, services, promotions, advertising, news, offers, and other information about the services and products related to the activity.
- If the User has expressly consented to the sending of commercial communications electronically by subscribing the NEWSLETTER, the sending of such communications by electronic means informing the Users of the activities, services, promotions, advertising, news, offers, and other information about the services and products of CVSTOM Co equal or similar to those that were originally the aim of the contract or interest by the User.
- The storage of personal data during the periods provided in the applicable provisions.

Official means of communication

The User is informed that the means enabled by the company to communicate with customers and others affected are the corporate phone, corporate mobile phones, and corporate email.

If you send personal information through a means of communication other than those indicated in this section, the PROVIDER will be exempt from liability in relation to

the security measures available regarding the medium in question.

Assignments or transfers recipients

CVSTOM Co may carry out data transferring or communication of data to third parties. The recipients of the information will be providers or subsidiary companies linked to CVSTOM Co and with whom the corresponding Data Processing Agreement will be signed.

CVSTOM Co will hand out data information to the authorities and to the police if there is a need to comply with a legal procedure, legal obligation, without prejudice of blocking or cancelling an account if there are signs of criminal offence. The information handed to the authorities in such an event will only regard the current information stored by the service provider.

The information that you provide us both through this website and through the application will be hosted on the servers of CVSTOM Co.

With the acceptance of this privacy policy, you are accepting that your personal information may be processed by CVSTOM Co's data processors and by all subsidiary CVSTOM Co companies.

Rights of concerned individuals

You may request to exercise the following rights at any time by contacting us by email to gdpr@smile2impress.com or in writing to the postal address located in the letterhead. Please attach valid Id (like passport or driving license).

These are your rights related to your personal data:

Right to access	Allows the interested party to acknowledge and obtain information about their personal data submitted to processing.
Right to rectification or deletion	It allows to correct errors and modify the data that proves to be inaccurate or incomplete.
Right to erasure	Allows data that turns out to be inadequate or excessive to be deleted.
Right to withdraw consent	The right of the interested party to not carry out the processing of their personal data or to cease it.
Restriction of personal data processing	Involves the marking of personal kept data, with the purpose of limiting its' future processing.
Portability of data	Facilitation of the data subject to processing to the interested party, so that he or she can transmit it to another person in charge, without impediments.
The right not to be subject to automated individual decisions (including the elaboration of profiles)	The right not to be the subject of a decision based on automated processing that produces effects or significantly affects the User.

You may also contact our Data Protection Officer directly: xavi@aurisadvocats.com

Please attach to your request, exact information of what right you wish to exercise and, in all cases, send ID proof that is legally valid.

As a User, you have the right to withdraw consent given at any time. The withdrawal of consent will not affect the lawfulness of the process carried out before the withdrawal of consent.

You also have the right to submit a claim to the supervisory authority if you believe that your rights may have been violated in relation to the protection of your personal data.

Additional information

INFORMATION WE COLLECT

The data collected by the Data Controller are the following:

- Data provided by users through the different services offered on the website
- Data included in the different forms provided on the website
- Data collected through “cookies” to improve the browsing experience as reported in the cookie policy.
- Data provided by clients receiving the services, by any means.

Through this Privacy Policy, we inform you that the photographs that are posted on the website are property of CVSTOM Co, including those of minors, of which, in order to obtain these, prior consent of the parent, tutors, or legal representatives has been obtained by signing the forms made for that purpose by the centres in which matters regarding minors are regulated.

COPPA (Children’s Online Privacy Protection Act)

Our Platforms are meant for adults. We do not knowingly collect personally identifiable data from children under 13. If you are a parent or legal guardian and think your child has given us information, you can write to us at the address listed at the end of this website Policy. Please mark your inquiries “COPPA Information Request.” Parents, you can learn more about how to protect children’s privacy on-line visiting: <https://www.consumer.ftc.gov/articles/0031-protecting-your-childs-privacy-online>.

California privacy rights

We collect various types of personal information about you both online and offline, as described in this Privacy Policy.

If you reside in California, we are required by California law to provide you with additional information about how we use and disclose your personal information, and you may have additional rights with regard to how we use your personal information. We have included this California-specific information below.

California Residents’ Privacy Rights.

Your personal data will only be used for the following purposes:

- To carry out the necessary commercial and administrative procedures with Web Users;
- To send you commercial information by email, fax, SMS, MMS, Social Media or any other form of electronic or com-

munication. Whenever the user has given express consent to the sending by subscribing to our NEWSLETTER.

- To respond to queries and/or provide information requested by the User;
- To manage User interaction in our Social Media platforms.
- To carry out the provision of services and/or products contracted or subscribed to by the User
- To use your data to contact you, both electronically and non-electronically, to obtain your opinion about the service provided and,
- To notify you about changes, important developments of the privacy policy, legal notices or cookies policy.
- Analysis of profiles and usability may be carried out.
- Client and/or supplier’s data will be processed, within the contractual relationship that links them with the person in charge, in compliance with the administrative, fiscal, accounting, and working obligations that are necessary under the current legislation.

Social media

We inform you that CVSTOM Co may have a presence on social networks. The processing of data that is carried out concerning the people who become followers on social networks (and/or carry out any link or connection action through social networks) of the official pages of CVSTOM Co will be governed by this section, as well as those conditions of use, privacy policies, and access regulations that belong to the social network that is appropriate in each case and previously accepted by the User.

CVSTOM Co will process your data with the purpose of correctly managing your presence on social networks, informing you of the provider’s activities, products, or services, as well as for any other purpose that the regulations of the social networks allow.

The publication of the following content is prohibited:

- That is unlawful by national, community, or international regulations or that they carry out activities that are presumably unlawful or contravene the principles of good faith.
- That threaten the fundamental rights of people, lack courtesy in the network, annoy or may generate negative opinions to our Users or third parties and in general whatever the content that CVSTOM Co deems inappropriate.
- In general, that contravene the principles of legality, honesty, responsibility, protection of human dignity, protection of minors, protection of public order, protection of privacy, consumer protection, and intellectual and industrial property rights.

Likewise, CVSTOM Co reserves the right to remove, without notice from the website or the corporate social network, those contents deemed inappropriate.

Communications sent through social networks will be incorporated into a file owned by CVSTOM Co and may send you information of interest.

You can access more information, as well as consult the companies that are part of CVSTOM Co, through the following link: www.empresa.com/politicadeprivacidad.

In any case, if you send personal information through the social network, CVSTOM Co will be exempt from liability in relation to the security measures applicable to this platform, which is the Users' responsibility to know, by checking the corresponding conditions particular to the network in question.

Security measures

The information you provide will be processed confidentially. The Provider has adopted all the technical and organizational measures and all the levels of protection necessary to guarantee the security in the processing of the data and to avoid its alteration, loss, theft, processing or unauthorized access, according to the state of technology and nature of the stored data. Likewise, it is also guaranteed that the processing and registration in files, programs, systems or equipment, premises and centres comply with the requirements and conditions of integrity and security established in the current regulations.

Sending of cv

In the event that the User submits his or her CV through any means established by CVSTOM Co, we inform you that the information provided will be processed to make him or her participant in the selection processes that may exist, carrying out an analysis of the applicant's profile in order to select the best candidate for the vacancy of the Company (Provider). We inform you that this is the only official procedure to accept your CV, so CVs submitted by another procedure will not be accepted. In case of any change in the data provided, please inform us in writing as soon as possible, in order to keep your data properly updated.

The data will be kept for a maximum period of one year, after which the data will be deleted guaranteeing a total respect to confidentiality both in the processing and in its subsequent destruction. In this sense, after the aforementioned deadline, and if you wish to continue participating in the selection processes of the Company (Provider), please re-submit your CV.

The data may be processed and/or communicated to the member companies of our group during the time of conservation of their curriculum and for the same purposes previously reported.

Changes in the present privacy policy

CVSTOM Co reserves the right to modify this policy to adapt it to new legislation or jurisprudence dispositions.