

## PRIVACY POLICY

*The data controller is BIC IBERIA, S.A.U., whose registered offices are in Pol. Ind. Entrevies, s/n, 43006 Tarragona.*

### 1. Privacy declaration

BIC IBERIA, S.A.U., (hereinafter referred to as “BIC” or “We”) is committed to protecting your privacy whenever you visit our website [www.bichashtagcontest.com](http://www.bichashtagcontest.com) (the “Website”). The aim of this privacy policy (“Privacy Policy”) is to inform you about the types of information that we collect about you when you visit the Website, how we use this information, whether we pass it on to anyone else, and the decisions that you can make regarding its use.

Apart from the information related to how you use the Website, (for more information, please refer to Section 4 of this Privacy Policy) [and other technical information that we gather automatically, such as your IP address], we do not automatically collect any personal information about you when you visit the Website. Any other personal information that we gather will have been provided by you for a specific purpose, for example, when inserting your personal data for us to manage your participation in the “BIC® HASHTAG CONTEST 2018” Competition.

In some cases, if you do not provide your personal information, we will be unable to provide you with a service offered through the Website. We will let you know when you have to provide information for us to be able to provide a service.

### 2. Information about the collection and processing of personal data.

Please be reminded that in order to take part in the competition, participants are required to provide certain personal information about themselves (name and surname, email address, and postal address if necessary).

This collection of data requires the data subject to provide their explicit, free, specific, informed, and unequivocal consent, which will be provided via computer applications that ensure the provision of this consent. Without this consent, the visitor will not be able to take part in the competition.

Additionally, we kindly remind data subjects that they can withdraw this consent at any time, by contacting the data controller.

In accordance with article 13 of the European General Data Protection Regulation 2016/679, we hereby inform data subjects of the following points:

- The data controller: BIC IBERIA, S.A.U., registered under tax ID number A-08086878, with registered offices in Pol. Ind. Entrevies s/n, 43006 Tarragona.
- The data processor responsible for managing the contestants is the company WE ARE SOCIAL, S.R.L., whose registered offices are in Corso San Gottardo 42/A Milan 20136 (Italy), and whose tax ID number is 06969400966; The company responsible for sending prizes to the winners will be VANNG PUBLICIDAD E IMAGEN, S.L., whose registered offices are in C/ Guifré nº 100, Entlo 2, 08912 Badalona, registered under tax ID number 61832531.

- This data is processed in order to manage competition participation and the delivery of prizes. This data will be kept for a maximum period of 4 months starting from the end of the competition to handle any potential complaints or incidents.
- If there is such an option on the Website, we hereby inform any data subjects that have consented to being contacted after the competition that their personal data will only be processed so that they can receive marketing information about products and/or promotions for BIC® products. Under no circumstances will processing be carried out to create automatic profiles or similar. Data processing will be carried out using pseudonymised data wherever possible. This data will be kept for a period of 2 years starting from the date when it was provided.
- Personal data will not be passed on or processed for purposes other than those described in this document.
- Both the data controller of the personal data and the data processor possess the material, technical, and human resources to ensure the integrity and security of the data.

Data subjects will be able to exercise their rights to access, correct, or delete their personal data, limit or oppose its processing, as well as the right to ensure the portability of their personal data by sending an email to the following email address: [lopd.biciberia@bicworld.com](mailto:lopd.biciberia@bicworld.com); or by sending a request in the post to the following address of the Organiser:

BIC IBERIA, S.A.U.  
Departamento Legal  
Concurso BIC® HASHTAG CONTEST 2018  
Pol. Ind. Entrevies, s/n. Complejo BIC  
43006 Tarragona

### **3. Information that we gather about you:**

As explained in Section 1 of this Policy, when you visit our Website or use our services, we can automatically gather: (i) technical information, such as the IP address that you are using to connect your computer to the Internet; the types and versions of plugins used by the browser; and (ii) information about your visit to our Website and how you used our services.

We will use this information:

- To provide the information, products, and services that you have asked from us.
- To manage our Website in order to carry out internal operations, including those that aim to resolve problems, analyse data, carry out tests and studies, and compile statistics.
- To make sure that content is presented to you in an accessible and intuitive way.
- To help us to ensure the security and protection of our Website.
- To display advertising to you that you may be interested in.

### **4. ¿What is the legal basis for processing your personal information?**

We only process your personal information when we have a legal basis that allows us to do so. Depending on what we are processing your personal information for (as explained earlier in Section 2), the legal basis will be one of the following:

- **Implementing a contract:** for example, when we need it to process your personal information in order to process a request or subscription that you have made through our Website.
- **Your consent:** for example, if you have specifically given us your consent to process your data (participation in a competition, etc.).
- **For our own legitimate business interests or those of our third parties:** for example, when BIC has to process your personal information in order to prevent fraud (against intellectual property, etc.).
- **Complying with the law:** for example, when BIC is subject to a legal or regulatory obligation and has to use your personal information to fulfil this obligation.

## 5. Amount of time that the personal information that we collect is kept for

We take measures to ensure that the personal information that you provide is only kept for the amount of time necessary to carry out what it has been collected for. The personal information collected for processing requests made through our Website is normally kept for the duration of the contract plus an additional amount of time, in accordance with the legal time limit set by the jurisdiction in question.

Once we have collected your personal information with your consent but then have no other legitimate basis to continue processing it, you may withdraw or change your consent for us to use or process your personal information at any time, in accordance with legal restrictions. The withdrawal of your consent will be valid in terms of future processing and will not affect the legality of the processing that has already been carried out with this consent. Additionally, in case of any doubts, the amount of time that data is kept for is specified earlier in Section 2, in accordance with your consent every time processing takes place.

## 6. Use of cookies and other similar types of technology

Like many other websites, our Website is able to use a standard type of technology known as a “cookie”, or any other technology that is similar to a cookie, to gather and record information about your use of the Website. Cookies are designed in particular to help us to recognise your browser and, thanks to this, save and remember any preferences that you have set and to improve your user experience when you visit our Website again.

The cookies that we use cannot extract any other information from your hard drive nor do they carry computer viruses.

We are able to issue cookies that allow us to:

- Gather statistical data and determine the amount of traffic, as well as to measure how much the different sections of our Website (visited headers and content, clickstreams) are being used, which helps us to improve the value and usability of our services; to do this we can use Google Analytics or any other third-party analytical tool. The information that we collect is grouped together and cannot directly be identified. We can share this information with developers or other service providers that work with us on the Website. For more information about Google Analytics, visit: <http://www.google.com/analytics/learn/privacy.html>.
- Personalise the presentation of our Website according to the display settings of your data terminal (language, screen resolution, operating system, etc.) during your visit to our

Website, beginning with the hardware of your data terminal and your display and video software.

- Personalise the advertising that is displayed in our advertising space on your data terminal by taking the personal information that you have provided to us into consideration.
- Allow you to access the restricted and personalised areas of our Website, such as, for example, your account, based on the user names, passwords and any other information that you have previously provided to us.
- Improve your visit, personalise the homepages, identify which sections of a website have been visited, or keep a record of your preferences and track your movements across the pages of our Website.
- Implement security measures, such as, for example, having to start the session again in order to access certain content or services once a certain amount of time has passed.
- Store the information contained within forms that you have filled out on our Website in order to access restricted or personalised areas of this Website (your account) or any product, service, or information that you select on our Website (contents of your shopping basket).

We only use cookies to gather the information mentioned in this policy and not for collecting personal information that can identify you without your consent.

In any case, you can decide whether to allow or block the use of cookies. There are many ways to manage cookies, such as those described below. However, they may cause difficulties when browsing through our Website.

- You can set your browser to allow cookies to be stored on your data terminal, to automatically reject them, or to reject cookies originating from certain sources. You can also change your browser’s settings so that it immediately asks you whether to accept or reject cookies before they are stored onto your data terminal. Every browser has different ways of managing cookies and the various settings for these. How to change your browser’s settings is explained in your help menu, which also tells you how to change its cookies settings.
- Flash cookies that are used by Adobe Flash Player are managed in a different interface to the one used by your browser. “Adobe Flash Player”® is an application that allows you to quickly view dynamic content by using the computer language “Flash”. Flash and other similar applications store settings, preferences, and use data by using a technology similar to cookies. If it is possible for your data terminal to display content developed using Flash technology, go to the Flash cookies management tool directly available from <http://www.adobe.com>.
- Lastly, you can also go to [www.youronlinechoices.com](http://www.youronlinechoices.com), a website recommended by digital marketing professionals to help you to check, accept, or reject certain cookies on your browser.

## **7. Third-party cookies on our Website**

The issuing and use of cookies by third parties are subject to the protection of privacy policies and/or those regarding the cookies of these third parties.

There may be third-party software applications on our Website that allow you to share the content available on it with other people or to let them know about your visit or your opinion of the content of our Website. This is exactly what happens with “Share” and “Like” buttons on social networks such as “Facebook”, “Twitter”, “LinkedIn”, “Viadeo”, etc.

The social networks that use these buttons may use them to identify you even when you have not used them during your visit to our Website. In fact, these types of application buttons may allow the social network in question to keep a record of how you navigated throughout our Website simply due to the fact that your account on that social network was active on your data terminal (open session) whilst you were visiting our Website.

We have no control over the processes used by social networks to gather information about your visits to our Website, nor the personal information that these may hold. We kindly ask you to consult the privacy protection policies of these social networks to understand the objectives behind using these types of buttons to collect browsing data, especially regarding advertising. The policies of social networks have to allow you to exercise your right to choose through your account settings.

## **8. Links to or from other websites**

This Website may contain links to other websites. BIC does not control or assume any responsibility for the privacy practices of these websites. Please consult the privacy policies of every website that you visit.

## **9. Behavioural advertising**

We do not track your browsing activity on any other website, just on our own. We do not use the information obtained on our Website to take part in activities commonly known as behavioural advertising, and, by default, we do not track your browsing activity on any other website. Some browsers have a feature called “tracking protection”, which allows you to tell websites that you do not want them to track your online activities. This function has still not been standardised, therefore our Website responds to some of these indications, but not all of them.

## **10. Sharing with third parties**

Under no circumstances will your personal data be passed on, shared, or accessed by third parties without your consent or any other information, wherever applicable. Third-party suppliers store the information they need to carry out specific functions and are not authorised to use or share personal information for their own marketing or other types of objectives.

## **11. Security of your personal information**

We implement policies and procedures to protect your personal information from loss, unauthorised access, modification, or sharing. We have also implemented various technological protection measures, including security software, passwords, and firewalls, aimed at preventing unauthorised access to computers. In any case, it cannot be guaranteed that a system remains impenetrable in exceptional circumstances or that it will be able to resist future attacks.

## **12. Sending and storing information**

Your personal information is saved in secure locations and on servers located in the United States. We or our service providers are able to use servers located in the United States, for backup and emergency storage of this Website. Any electronic record generated by us or our service providers whilst you are interacting with the Website may be kept on these servers. Your personal information can therefore be shared, processed, and stored outside of your country of residence. However, we will take any measures deemed reasonably necessary to ensure that your data is processed securely and in accordance with this privacy policy. You can ask us about the privacy policies and the practices related to the processing of your personal information by contacting us via the methods mentioned below.

## **13. Online privacy of children**

We do not intentionally gather or store the personal information of children below the age of 13 or the age established by local legal regulations, nor do we contact them for commercial purposes.

Should there be a reason for us to do so, we will request the consent of their legal representative before collecting the personal information of any children whenever it is required by applicable laws and regulations (the age for which consent is required from a legal representative varies from one country to another).

## **14. Contacting us regarding this Privacy Policy or your personal information**

Any questions about this Privacy Policy, the collection or accuracy of your personal information, the processing of data, or requests to correct, modify, or delete your personal information can be sent to: [lopd.biciberia@bicworld.com](mailto:lopd.biciberia@bicworld.com).

This Privacy Policy may change at our own discretion. You should therefore regularly consult this Website to check for changes to this Privacy Policy. All changes will be published as soon as they take effect.

You also have the right to make a complaint to your local data protection authority, however, we recommended that you contact us before doing so, as we may be able to resolve any problem directly with you more efficiently.

**BIC IBERIA, S.A.U**

**SEPTEMBER 2018**