

PRIVACY POLICY

IDENTITY OF THE DATA CONTROLLER AND PROCESSOR

Pursuant to applicable regulations on data protection, Quantum Marketing Solutions S.L, a Spanish company registered at Calle Mandri 38, 2-2, 08022 Barcelona (Spain), holder of VAT number B-64873060, and owner of this website (<https://hlycard.com>), hereby declares that it is the Data Processor as it provides the service of redemption and activation of prizes to the Data Controller.

PURPOSE OF PROCESSING DATA

The collection and processing of personal data has the sole and exclusive purpose of enabling the redemption of the Top-up Card prize, as a result of participation in promotions for said gift.

This promotion is not intended for children under the age of 18.

In accordance with applicable regulations on data protection, the Data Processor, on behalf of the Data Controller, informs participants and winners (hereinafter, also the Data Subjects) that the personal data provided to participate in this promotion will be processed in accordance with the following terms and conditions:

- a) Purposes of the processing and transfers of the data of data subjects: The data of participants will be processed for the following purposes:
 - To manage participation and check that the Data Subject meets the necessary requirements.
 - To inform the Data Subject of instructions on the prize obtained. The data provided by the Data Subject at the time of registration or subscription will be deemed to be correct.
 - To provide the Data Subject with the necessary information so that their participation complies with the terms & conditions of use.
 - To verify the absence of fraudulent actions or actions contrary to the terms & conditions of use.

- b) Consent of the Data Subject for processing: The registration and participation of the Data Subject in this promotion implies the full and explicit acceptance of the processing of their personal data for the indicated purposes of processing. Therefore, if the Data Subject does not consent to the processing of their data in any way, they will refrain from participating in this promotion. Notwithstanding the foregoing, at any time the Data Subject may exercise their right of access, right to rectification, right to erasure, right to restrict processing, right to data portability, right to object, and right not to be subject to a decision based solely on automated processing.

- c) Updating of data: The Data Subject is hereby informed that, as the owner of the data provided, they are obliged to communicate, in the shortest time possible, any variation of their data in order for the aforementioned entity to duly update it. Otherwise, it will be understood that the data provided by the Data Subject is accurate and up to date.
- d) Scope of the content of the processing of the personal data of the Data Subject: The provisions of the terms & conditions of the promotion which will award these gifts, in relation to the content of the processing of personal data of participants and winners, is complementary and not exclusive of any other legal texts communicated to said Data Subjects by means of coupons, registration forms, privacy policies and other documents in any phase of their participation.
- e) Exercise of the right of access, right to rectification, right to erasure, right to restrict processing, right to data portability, right to object, and right not to be subject to a decision based solely on automated processing: Participants, winners and any other Data Subjects may exercise their rights by contacting the Data Processor via the email address info@helloyalty.com.
- f) The Data Processor hereby informs the Data Subject that their personal data will not be transferred to third parties unless there is a legal obligation to do so. Meanwhile, service providers which carry out functions related to the described purposes of the processing may have access to their personal data as Sub-Processors, in which case the Controller and the Processor guarantee that they will adopt the data protection policies and measures required for the correct processing of said data.

Likewise, their data may be transferred, in order to comply with the purposes of processing, to companies outside the scope of the GDPR, in which case the Data Processor guarantees that it has adopted the necessary protection measures in order to standardise and guarantee the processing of data according to the applicable regulations within the European Union.

COOKIE POLICY

Cookies are used when the User browses the website. The cookies used are temporary, so they are not stored on the User's hard drive. In addition, when the User closes the website, cookies will not remain on said hard drive. The cookies used cannot read data on the User's hard drive or read the cookie files created by other providers. We use cookies to store information and personalise experiences on our websites. For example, cookies allow our sites to recognise the User's browser as a previous visitor, and in this way save and remember the preferences set while browsing our website. The User has the choice to set up their browser to give an on-screen warning when cookies are being sent.

The User should check the instructions and manuals of their browser for further information. If the User has any questions, they may contact us by sending an email to info@helloyalty.com.

SECURITY MEASURES

The company Quantum Marketing Solutions, S.L, in its capacity as Data Processor, has adopted the legally required security measures in accordance with the provisions of the applicable regulations on the protection of temporary data. Likewise, it guarantees the confidentiality of personal data, except in the case of information required by law or any other applicable and mandatory regulation.

QUALITY MANAGEMENT PRINCIPLE

The Data Controller will ensure, through its Data Processor, the quality of the data provided, ensuring that it is appropriate, relevant and not excessive for the legitimate purpose of the processing.

The User guarantees and assures, on all occasions, the truthfulness, accuracy, validity and authenticity of the personal information provided and undertakes to keep it updated.

If the Data Protection Policy were to be modified as a result of legislative changes or criteria emanating from the Spanish Data Protection Agency, the User will be duly informed of any variation which may be necessary in order to comply with the law.