1. Who will process your personal data?

- **Holder:** ZINKIA ENTERTAINMENT, S.A.
- **Registered office:** Calle José Picón, 31 28028 Madrid, Spain
- **Tax identification number:** A82659061
- **Public registry:** Commerce Registry of Madrid, Tomo 15359, Folio 224, Sección 8, Hoja Número M-257615, Inscripción 23ª
- **Telephone:** (+34) 915 240 365
- **E-mail:** apps@zinkia.com

ZINKIA ENTERTAINMENT, S.A. (hereinafter, “ZINKIA”) is compromised with the respect of the privacy of its users along with the protection and security of their personal data. Therefore, ZINKIA informs the user about the way it collects, processes and protects the personal data that the users submit through its online platforms, applications or its website (hereinafter, the “Application”).

The user must read carefully this privacy policy which has been written plainly and simply to facilitate the understanding thereof so that the user may determine freely and voluntarily whether he or she wishes to submit his or her personal data to ZINKIA.

Additionally, the user guarantees that the submitted data are truthful, accurate, full and kept up to date, and that he or she shall be responsible for any damage, whether direct or indirect, that may derive from a violation of such compromise. In the event that the delivered data belonged to a third party, the user guarantees that he or she has informed the said third party of the aspects contained in this document and has obtained his or her authorisation to submit his or her personal data to ZINKIA for the indicated purposes.

With respect to under-sixteen years old, in no event shall ZINKIA permit them to directly submit any personal data. Instead, ZINKIA shall address their parents or legal guardians directly and may request confirmation by e-mail that the data has been indeed provided by adults. Nonetheless, ZINKIA may also request at any moment the written consent of parents or legal guardians to verify their knowledge and authorisation of the access of the children to the Application.

Moreover, ZINKIA also guarantees that this information shall not be processed for purposes other than the ones indicated in the data collection form or in the corresponding email. ZINKIA shall bear in mind the age, understanding capacity, consciousness and maturity of the under-sixteen and shall never request any information concerning the economic circumstances or personal data of their family.

Furthermore, ZINKIA shall facilitate parents and legal guardians the exercise of their legal rights, specified in section seven hereof and forewarns the under-sixteen users about the convenience of consulting to their parents or legal guardians before using the services of ZINKIA.

2. For what purposes do we process your data?

The collection of your personal data is performed solely and exclusively by means of the forms made available in the **Application** and the e-mails that our clients may remit to
ZINKIA by email to apps@zinkia.com, in order to request our services, communicate technical incidence, exercise their rights or raise any queries.

ZINKIA shall process the personal data of the user for the following specific purposes:

1) To sign up as user of the offered services
2) To permit the contracting of the Premium version of the Application, including the collection management.
3) To resolve queries, suggestions and claims raised by the users through the channels made available for that purpose (contact form, chat or email)
4) To analyse users’ comments posted in the places of the Application made available for that purpose, in order to solve the corresponding incidences.
5) To analyse the activity of the User in the Application in order to create a profile that allows ZINKIA to provide information of products and services of third parties.
6) To comply with legal obligations

3. Mandatory nature of the requested data

The data requested by ZINKIA in the forms located in the Application or the data received by email shall be necessary to comply with the contractually or legally established purpose, save indication on the contrary.

Therefore, if the user does not submit such data, ZINKIA will not be able to give the User access to the Application or to send an answer to the raised query.

4. On what grounds are we legitimated to process?

The legal ground for the processing of your data is the necessity for the execution of the offered service. In the event that the User contacts ZINKIA for any reason, the legal ground for the processing of your data is your consent.

5. With whom do we share your data?

If so consented by the User, Zinkia may inform third parties about the data obtained through the App, related to the user’s browsing and profile, in order to provide content related to the products and services of third parties. The data transferred will only be those that allow to offer the information through third-party websites.

However and notwithstanding the above, Zinkia doesn’t use or collect data/any information from TrueDepth API. In this sense, Zinkia doesn’t share any data with third parties. Zinkia doesn’t include third party analytics and advertising. In this particular sense Zinkia doesn’t share data with any third parties. Zinkia doesn’t collect any user or device data with third party analytics and advertising.

Save indication on the contrary, ZINKIA does not transfer personal data to third parties. Nevertheless, where required by an agreement enforceable between the parties or by the law, ZINKIA may be obliged to communicate personal data to third parties such as Courts or Tribunals.

Likewise, personal data may be shared with suppliers who render their services to ZINKIA. In this respect, ZINKIA guarantees that these suppliers shall always comply with the applicable legislation and that in no event shall ZINKIA process the personal data for purposes other than the ones indicated pursuant this Privacy Policy.
6. What are your rights as data subject?

The user may, at any time and free of charge, exercise his or her rights to access, to rectification, to erasure, to restriction, to data portability and to object by raising request to the postal or the e-mail addresses above-indicated in the terms established by the current legislation.

In all events, hereby the user becomes informed that where he or she considers that ZINKIA has violated or may have violated the rights granted by the applicable legislation on data protection, he or she may file a claim before the Spanish supervisory authority (Agencia Española de Protección de datos).

7. Withdrawal of consent

Where the processing is based on your consent and does not affect the data necessary to perform a contract between ZINKIA and the data subject, the consent of the user to the processing of his or her data shall always be reversible, without retroactive effects. In order to withdraw said consent the users may address ZINKIA by means of the channels above-mentioned.

8. Deadline for the storage of your data

ZINKIA shall store the personal data of the users for as long as it is deemed necessary to accomplish the purposes for which they were collected.

9. Changes in the Data Protection and Security Policy

ZINKIA reserves the right to arbitrarily modify its data protection and security data at any time and without prior notice, always under the Spanish current and applicable legislation on personal data protection.

Last amendment: July 23, 2021