

## **Privacy Policy**

### **of Metro España App (“Application”)**

In order to receive information about your Personal Data, the purposes and the parties the Data is shared with, contact **Metro España** (“Owner”) via contact details specified below.

**Owner contact email:** dev.ios.sp@icloud.com

### **Types of Data collected**

Most of the information that we collect about you comes directly from you when you visit the Application. In general, the information we collect about you relates to the type of device you are using, information that helps us identify your device, how you use the Application and may include information that you submit to us when you voluntarily contact us. We may also collect information from app store platforms and partners and other third parties such as information about your interests and in-app purchases (provided that we never receive your payment or credit card information).

Personal Data may be freely provided by the User, or, in case of Usage Data, collected automatically when using the Application. We may receive Personal Data about you from third-party sources or services specified in this Privacy Policy. We may get your personal information for example when you installed our Application and prior to installing you have clicked an advertisement for the same Application.

Complete details on each type of Personal Data collected are provided in the dedicated sections of this privacy policy or by specific explanation texts displayed prior to the Data collection.

Unless specified otherwise, all Data requested by the Application is mandatory and failure to provide this Data may make it impossible for the Application to provide its Services. In cases where the Application specifically states that some Data is not mandatory, Users are free not to communicate this Data without consequences to the availability or the functioning of the Service.

Users who are uncertain about which Personal Data is mandatory are welcome to contact the Owner.

Any use of Cookies – or of other tracking tools — by the Application or by the owners of third-party services used by the Application serves the purpose of providing the Service required by the User as described in the present document.

### **Mode and place of processing the Data**

#### **Methods of processing**

The Owner takes appropriate security measures to prevent unauthorized access, disclosure, modification, or unauthorized destruction of the Data.

The Data processing is carried out using computers and/or IT enabled tools, following organizational procedures and modes strictly related to the purposes indicated. In addition to the Owner, in some cases, the Data may be accessible to certain types of persons in charge, involved with the operation of the Application (administration, sales, marketing, legal, system administration) or external parties (such as third-party technical service providers, mail carriers, hosting providers, IT companies, communications agencies) appointed, if necessary, as Data Processors by the Owner. The updated list of these parties may be requested from the Owner at any time.

The Application uses third-party services specified below in this Privacy Policy, which process data on behalf of the Owner. These services may process Data outside the User's jurisdiction, including in the United States.

### **Place**

The Data is processed in places where the parties involved in the processing are located. Depending on the User's location, data transfers may involve transferring the User's Data to a country other than their own. To find out more about the place of processing of such transferred Data, Users can check the section containing details about the processing of Personal Data.

### **Retention time**

Unless specified otherwise in this document, Personal Data shall be processed and stored for as long as required by the purpose they have been collected for and may be retained for longer due to applicable legal obligation or based on the Users' consent.

### **Cookies and other Trackers**

The Application uses technologies that help the Application to achieve the purposes described below. Such technologies allow the Owner to access and store information (for example by using a Cookie) or use resources (for example by running a script) on a User's device as they interact with the Application.

For simplicity, all such technologies are defined as "Trackers" within this document – unless there is a reason to differentiate. For example, while Cookies can be used on both web and mobile browsers, it would be inaccurate to talk about Cookies in the context of mobile apps as they are a browser-based Tracker. For this reason, within this document, the term Cookies is only used where it is specifically meant to indicate that particular type of Tracker.

Some of the purposes for which Trackers are used may also require the User's consent. Whenever consent is given, it can be freely withdrawn at any time following the instructions provided in this document.

The Application uses Trackers managed directly by the Owner (so-called "first-party" Trackers). The Application may also use third-party Trackers to collect anonymized data for analytics purposes. These third-party Trackers may include device

identifiers, app interaction data, and demographic information, used solely to improve the Application and provide statistical insights.

The validity and expiration periods of first-party and other Trackers may vary depending on the lifetime set by the Owner. Some of them expire upon termination of the User's browsing session.

### *Necessary*

The Application uses so-called "technical" Cookies and other similar Trackers to carry out activities that are strictly necessary for the operation or delivery of the Service.

Given the objective complexity surrounding tracking technologies, Users are encouraged to contact the Owner should they wish to receive any further information on the use of such technologies by the Application.

### *Measurement*

The Owner may use Trackers to measure traffic and analyse User behaviour to improve the Application, namely for the purpose of:

- Analytics
- Beta Testing
- Marketing

### *Remarketing and behavioral targeting*

The Owner may use Trackers to deliver personalised marketing content based on User behaviour and to operate, serve and track ads.

## **Detailed information on the processing of Personal Data**

We cannot provide all services necessary for the successful operation of the Application by ourselves. We must, therefore, share collected information with third parties for the purposes of developing and delivering our services, displaying advertisements, conducting analysis and research and for measuring our and our partners' advertising campaign performance. We also reserve the right to disclose your information (including personally identifiable information) when we are legally required to do so, to disclose your information in an anonymous and aggregated manner, meaning you could not be personally identified from it.

We may engage third parties to process (i.e. without limitation to collect, record, organise, structure, store, adapt or alter, retrieve, consult, use, disclose by transmission, disseminate or otherwise make available, align or combinate, restrict, erase or destruct) your personal information.

Please be aware that some of the following partners may act as independent data controllers (businesses) and thus determine their own purposes and means of processing in respect of your personal information, without any further assistance, control or endorsement from the Owner. In order to stay fully cognizant of the privacy

practices that may apply to the processing of your personal data, please get acquainted with the privacy statements of our processing partners that are placed below.

Personal Data is collected for using the following third-party services:

Partner's Name	Link to Partner's Privacy Statement	Partner's Functions	Personal Data processed
Google LLC Google Ireland Limited	<a href="#">Policy Business Data page</a> <a href="#">Firebase Privacy Policy</a>	Firebase Analytics	Trackers; Usage Data, including but not limited to device information, app usage patterns, and crash reports. These tools may also collect demographic data and anonymized identifiers
Meta Platforms, Inc. Meta Platforms Ireland Limited	<a href="#">Privacy Policy</a>	Facebook SDK	Trackers; Usage Data (e.g., app usage, device identifiers, and ad interaction); Approximate location data; Demographic data (if personalization is enabled). Data may include anonymized or pseudonymized identifiers.
Google LLC / Google Ireland Limited	<a href="#">Google Privacy Policy</a> <a href="#">AdMob Privacy Policy</a>	Google AdMob	Trackers; Usage Data (e.g., app usage, device identifiers, and ad interaction); Approximate location data; Demographic data (if personalization is enabled). Data may include anonymized or pseudonymized identifiers.

### Further Information for Users

#### Legal basis of processing

The Owner may process Personal Data relating to Users if one of the following applies:

- Users have given their consent for one or more specific purposes.
- provision of Data is necessary for the performance of an agreement with the User and/or for any pre-contractual obligations thereof;
- processing is necessary for compliance with a legal obligation to which the Owner is subject;

- processing is related to a task that is carried out in the public interest or in the exercise of official authority vested in the Owner;
- processing is necessary for the purposes of the legitimate interests pursued by the Owner or by a third party.

In any case, the Owner will gladly help to clarify the specific legal basis that applies to the processing, and in particular whether the provision of Personal Data is a statutory or contractual requirement, or a requirement necessary to enter into a contract.

The Application processes Data collected by third-party services specified in this Privacy Policy on the basis of legitimate interests pursued by the Owner, such as understanding how Users interact with the Application and improving its functionality.

### **Further information about retention time**

Unless specified otherwise in this document, Personal Data shall be processed and stored for as long as required by the purpose they have been collected for and may be retained for longer due to applicable legal obligation or based on the Users' consent.

Therefore:

- Personal Data collected for purposes related to the performance of a contract between the Owner and the User shall be retained until such contract has been fully performed.
- Personal Data collected for the purposes of the Owner's legitimate interests shall be retained as long as needed to fulfill such purposes. Users may find specific information regarding the legitimate interests pursued by the Owner within the relevant sections of this document or by contacting the Owner.

The Owner may be allowed to retain Personal Data for a longer period whenever the User has given consent to such processing, as long as such consent is not withdrawn. Furthermore, the Owner may be obliged to retain Personal Data for a longer period whenever required to fulfil a legal obligation or upon order of an authority.

Once the retention period expires, Personal Data shall be deleted. Therefore, the right of access, the right to erasure, the right to rectification and the right to data portability cannot be enforced after expiration of the retention period.

### **Children Privacy**

The Application does not address anyone under the age of 16 ("**Children**"). When we collect personal information, we do not know the age of our Users. We do not knowingly collect personally identifiable information from Children. If you are a parent or guardian and you are aware that your Children have provided us with personal information, please contact us. If we become aware that we have collected personal information from a child under the age of 16 without verification of parental consent, we will take steps to remove that information from our servers.

Please note: When you download our Application from app stores, such as Google Play or Apple App Store, you will find published age recommendations in the apps' descriptions. However, these age or maturity classifications refer only to the content suitability (similar to movie ratings G, PG or PG-13 in the U.S., but related to animations, etc.) according to the respective rating body responsible for such ratings. As these ratings are done independently by a third party without our contribution, they are not necessarily in line with our policies.

For more info on how these categories are defined, visit such support websites (for example, those of Apple and Google).

## **The rights of Users based on the General Data Protection Regulation (GDPR)**

Users may exercise certain rights regarding their Data processed by the Owner.

In particular, Users have the right to do the following, to the extent permitted by law:

- **Withdraw their consent at any time.** Users have the right to withdraw consent where they have previously given their consent to the processing of their Personal Data.
- **Object to processing of their Data.** Users have the right to object to the processing of their Data if the processing is carried out on a legal basis other than consent.
- **Access their Data.** Users have the right to learn if Data is being processed by the Owner, obtain disclosure regarding certain aspects of the processing and obtain a copy of the Data undergoing processing.
- **Verify and seek rectification.** Users have the right to verify the accuracy of their Data and ask for it to be updated or corrected.
- **Restrict the processing of their Data.** Users have the right to restrict the processing of their Data. In this case, the Owner will not process their Data for any purpose other than storing it.
- **Have their Personal Data deleted or otherwise removed.** Users have the right to obtain the erasure of their Data from the Owner.
- **Receive their Data and have it transferred to another controller.** Users have the right to receive their Data in a structured, commonly used and machine readable format and, if technically feasible, to have it transmitted to another controller without any hindrance.
- **Lodge a complaint.** Users have the right to bring a claim before their competent data protection authority.

Users are also entitled to learn about the legal basis for Data transfers abroad including to any international organization governed by public international law or set up by two or more countries, such as the UN, and about the security measures taken by the Owner to safeguard their Data.

### **Details about the right to object to processing**

Where Personal Data is processed for a public interest, in the exercise of an official authority vested in the Owner or for the purposes of the legitimate interests pursued

by the Owner, Users may object to such processing by providing a ground related to their particular situation to justify the objection.

Users must know that, however, should their Personal Data be processed for direct marketing purposes, they can object to that processing at any time, free of charge and without providing any justification. Where the User objects to processing for direct marketing purposes, the Personal Data will no longer be processed for such purposes. To learn whether the Owner is processing Personal Data for direct marketing purposes, Users may refer to the relevant sections of this document.

### **How to exercise these rights**

Any requests to exercise User rights can be directed to the Owner through the contact details provided in this document. Such requests are free of charge and will be answered by the Owner as early as possible and always within one month, providing Users with the information required by law. Any rectification or erasure of Personal Data or restriction of processing will be communicated by the Owner to each recipient, if any, to whom the Personal Data has been disclosed unless this proves impossible or involves disproportionate effort. At the Users' request, the Owner will inform them about those recipients.

### **Additional information about Data collection and processing**

#### **Legal action**

The User's Personal Data may be used for legal purposes by the Owner in Court or in the stages leading to possible legal action arising from improper use of the Application or the related Services.

The User declares to be aware that the Owner may be required to reveal personal data upon request of public authorities.

### **Additional information about User's Personal Data**

In addition to the information contained in this privacy policy, the Application may provide the User with additional and contextual information concerning particular Services or the collection and processing of Personal Data upon request.

### **System logs and maintenance**

For operation and maintenance purposes, the Application and any third-party services may collect files that record interaction with the Application (System logs) or use other Personal Data (such as the IP Address) for this purpose.

Third-party services as specified in this Privacy Policy may collect system logs and usage statistics for diagnostic and troubleshooting purposes. These logs may include anonymized device and app interaction data.

### **Information not contained in this privacy policy**

More details concerning the collection or processing of Personal Data may be requested from the Owner at any time. Please see the contact information at the beginning of this document.

### **Changes to this privacy policy**

The Owner reserves the right to make changes to this privacy policy at any time by notifying its Users on this page and possibly within the Application and/or – as far as technically and legally feasible - sending a notice to Users via any contact information available to the Owner. It is strongly recommended to check this page often, referring to the date of the last modification listed at the bottom.

Should the changes affect processing activities performed on the basis of the User's consent, the Owner shall collect new consent from the User, where required.

### **Definitions and legal references**

#### **Personal Data (or Data)**

Any information that directly, indirectly, or in connection with other information — including a personal identification number — allows for the identification or identifiability of a natural person.

#### **Usage Data**

Information collected automatically through the Application (or third-party services employed in the Application), which can include: the IP addresses or domain names of the computers utilized by the Users who use the Application, the URI addresses (Uniform Resource Identifier), the time of the request, the method utilized to submit the request to the server, the size of the file received in response, the numerical code indicating the status of the server's answer (successful outcome, error, etc.), the country of origin, the features of the browser and the operating system utilized by the User, the various time details per visit (e.g., the time spent on each page within the Application) and the details about the path followed within the Application with special reference to the sequence of pages visited, and other parameters about the device operating system and/or the User's IT environment.

#### **User**

The individual using the Application who, unless otherwise specified, coincides with the Data Subject.

#### **Data Subject**

The natural person to whom the Personal Data refers.

#### **Data Processor (or Processor)**

The natural or legal person, public authority, agency or other body which processes Personal Data on behalf of the Controller, as described in this privacy policy.

#### **Data Controller (or Owner)**

The natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of Personal Data, including the security measures concerning the operation and use of



the Application. The Data Controller, unless otherwise specified, is the Owner of the Application.

**The Application**

The means by which the Personal Data of the User is collected and processed.

**Service**

The service provided by the Application as described in the relative terms (if available) and on this site/application.

**European Union (or EU)**

Unless otherwise specified, all references made within this document to the European Union include all current member states to the European Union and the European Economic Area.

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**Legal information**

This privacy policy relates solely to the Application, if not stated otherwise within this document.

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