PRIVACY AND DATA PROTECTION POLICY

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The Dancing Drops Privacy Policy describes the privacy practices of the Dancing Drops Services (as defined in our General Terms of Use) and anywhere we display or reference this policy.

If you reside within the European Union, your relationship is established with Eje Technologies S.L., the company that owns the Dancing Drops platform and application, which acts as the data controller for personal data collected through the platform, in accordance with Regulation (EU) 2016/679 of the European Parliament and of the Council of April 27, 2016, on the protection of natural persons with regard to the processing of personal data (hereinafter, GDPR), as well as Organic Law 3/2018, of December 5, on the Protection of Personal Data and guarantee of digital rights (hereinafter, LOPDGDD). Eje Technologies S.L. complies with the standards and policies that empower it to protect and keep your personal data confidential. The internal privacy contact is Sohit Shukla, accessible at privacy@dancingdrops.com.

If the content or information you store on the Dancing Drops Services contains the personal information of other individuals, you must have legal authorization to disclose such personal information to Dancing Drops.

SUMMARY OF KEY POINTS

At Dancing Drops, we take data privacy very seriously. We believe in transparency so you can control your data and make informed decisions about how it is used. Our commitment is to support and protect your privacy choices wherever you use our products and services.

Dancing Drops prioritizes putting you in control of your personal data in the following ways:

- This policy explains when we process personal information for our legitimate interests. You can ask us to stop processing this information.
- This policy also explains when we will obtain your consent before processing your personal data, as well as when it is necessary to do so because it is required by law.
- We use your personal information to allow you to register with Dancing Drops and to provide you with our Services.
- We provide interactive features that interact with social media sites, such as Facebook, Instagram, or TikTok. If you use these features, these sites will send us personal information about you.
- We use cookies and other technologies to track the use of our Services. For more information about opportunities to choose not to allow cookies. If you visit our website in a browser, this information is also available in our Cookie Policy.
- There are various places within the Dancing Drops Services that allow you to post comments, upload images, or submit content, which will be publicly available when you choose to participate in these activities.
- We also disclose personal information to advertising and sales partners, in accordance with your choices. We also disclose to third parties we hire to process personal information on our behalf, when the law requires such sharing, or in other specific situations.
- Your data protection rights are detailed in sections 8 and 9 of this Privacy Policy.

For any communication with the Dancing Drops team, the data provided will be processed in accordance with the provisions of this Privacy Policy.

1. DATA CONTROLLER

The data controller of the personal data collected through the Dancing Drops platform and application for the provision of its services, where it acts on its own behalf, is Eje Technologies S.L., owner of the Dancing Drops brand and platform (hereinafter, "Dancing Drops" or the "Controller"):

Identity	Eje Technologies S.L., owner of the Dancing Drops brand and platform
NIF/CIF	B26821868
Address	C/Antonio López 17, 1 Derecha, 28019, Madrid, Spain
Privacy Email	privacy@dancingdrops.com

2. DESCRIPTION OF THE PRIVACY POLICY

This privacy policy describes how Dancing Drops (also referred to as "we", "us", or "our") will use your information in the context of:

- Dancing Drops websites and web services (collectively referred to as "websites")
- Services that display or include a reference to this policy
- Dancing Drops marketing, sales, and advertising practices

This privacy policy applies when:

(i) Dancing Drops provides intermediary services directly to an individual (for example, when you access the Dancing Drops platform or app to request a laundry service) or,

(ii) Dancing Drops collects usage information from users who are employees of Dancing Drops commercial clients (unless a commercial client indicates otherwise).

In (i) and (ii), we are considered the "data controller" because we determine what personal data will be collected and how it will be managed, as detailed and permitted by this policy.

Conversely, Dancing Drops is considered the "data processor" and not the data controller when business clients use Dancing Drops products and services to support their own provision of products and services to individuals, since Dancing Drops acts under the direction of these business clients regarding any collection or processing of data on their behalf. This privacy policy does not apply to the data that Dancing Drops' business clients may collect from individuals or their uses of such data. If you have questions about the data practices of a specific organization in these scenarios, please contact the organization directly.

3. COLLECTION OF PERSONAL INFORMATION

3.1. USER Information

3.1.1. Purposes and bases of legitimization for the processing of personal data

Dancing Drops will process your personal data for the following purposes:

- For legal purposes
- For contractual purposes
- For security reasons
- For statistical and research purposes
- For commercial and marketing purposes
- For non-commercial purposes

Legal purposes:
Dancing Drops processes your personal data to:

i) Detect and investigate fraud and potential crimes committed against our platform and all users.

ii) Comply with applicable legislation in case any legal regulation requires us to retain your data for a period of time.

iii) Manage and fulfill your requests to exercise the rights established in the GDPR and local regulations.

iv) Bring, file, and defend legal actions against us.

v) In any of the aforementioned cases, Dancing Drops will have the right to use any of your data obtained or arising from your activity through our Platform in order to present and/or defend any claim and/or legal action that may be necessary, as well as to manage any incident arising in relation to User orders.

Contractual purposes
Dancing Drops processes your personal data to:

i) Grant the possibility of creating your own account,

ii) Provide you with the services you have requested and any other additional function of the Platform,

iii) Locate the nearest Partners and Courier (Mandatario) to the delivery point indicated by you. At launch, Dancing Drops will not continuously track the User's location. The User may optionally authorize access to their device's location to facilitate the entry or confirmation of the pickup or delivery address, being able to enter it manually in any case.

iv) Make payments and collections on your behalf,

v) Communicate your order to the Partner selected by you and keep you updated on the status of your order,

vi) Assist you in your decisions and in using the service, including the ability to quickly reorder from stores where you have placed orders in the past or suggest stores based on your past orders or popularity among new users. Additionally, we could assist you in your decisions through filters determined automatically by the history of orders you have placed in the past, providing specific content on the platform tailored to you in each case,

vii) Send you the receipt corresponding to your orders,

viii) Provide you with customer service to manage any incident related to your orders and be able to answer your questions or queries,

ix) Allow your direct contact with the Courier (Mandatario) in charge of your order,

x) Be contacted by our Partners in case of any incident with your orders,

xi) Process refunds and returns through both promotional codes and bank refunds,

xii) Notify you of changes or updates to our services, terms and conditions, privacy policy, cookie policy, and any other corporate document that may substantially affect you.

Security purposes
Dancing Drops processes your personal data to:

i) Use your device, location (including geolocation data, if you have accepted it), profile, usage data, and other data to prevent and detect malicious or unsafe activities; specifically, Dancing Drops uses your device's IP address to detect fraudulent activities on it.

...and keep the platform away from attackers attempting to access your account by spoofing your identity,

ii) Monitor all actions that could entail fraud or the commission of a crime related to the payment method used by you; if any irregularity is detected, Dancing Drops reserves the right to retain the data provided and share it with the competent Authorities to carry out the corresponding investigation,

iii) Ensure that you comply with the legal requirements related to the specific products you can order through the platform.

Statistical and research purposes
Dancing Drops processes statistics based on your personal data to:

i) Analyze trends, purchasing behavior, and their characteristics,

ii) Understand how you use our platform,

iii) Manage and improve the services offered, including the possibility of adding new or different features and services to improve service quality.

Commercial and marketing purposes
Dancing Drops processes your personal data to:

i) Carry out marketing, communication, research, and development activities,

ii) Analyze and investigate how to improve our services, both offline and on the platform, by using the data provided by you,

iii) Provide you with offers, promotions, discounts, and commercial communications only when you have voluntarily checked a non-pre-selected consent box (legal basis: consent, art. 6.1.a) GDPR and art. 21 LSSI-CE). You may withdraw consent at any time through the unsubscribe link included in each communication or by writing to privacy@dancingdrops.com.

iv) Carry out promotional activities for the delivery of samples or free products within the order placed by you, which may be of interest to you to promote Dancing Drops and our partners' products and services,

v) Carry out promotional activities such as contests, raffles, bidding questionnaires among users who have subscribed and/or submitted their data for such campaigns,

vi) Advertising audiences on Google or Meta: this functionality will not be active at launch and Dancing Drops will not send customer lists or personal data to these platforms to create custom audiences. If activated in the future, this Policy and the Cookie Policy will be updated, the corresponding consent mechanism will be implemented, and the guarantees provided in Section 7 will be applied.

vii) The use as commercial or marketing material published by you on your social media profiles when Dancing Drops has been expressly mentioned by you.

Non-commercial purposes
Dancing Drops processes your personal data to:

i) Generate and provide you with the receipts for each of your orders placed through our App,

ii) Inform you of any incident on the platform or in the operation of the services, including incidents related to your orders. This information may be sent by email or SMS message, and by any other messaging application that may be used between you and Dancing Drops at any time,

iii) Inform you of any changes in our General Conditions, privacy policy, cookie policy, services and, in general, inform you of any relevant non-commercial communication,

iv) Process incidents and claims with insurance companies only when a loss, damage, accident, casualty, or other event occurs that may be covered by an applicable policy.

3.1.II. Types of User data and method of collection

Dancing Drops has the following data about you:

1. Information provided directly by you:

1.1. Registration data: The information provided by you when creating an account on the Dancing Drops platform: username and email.

1.2. User profile information: information you enter into the platform to use Dancing Drops services, such as your mobile phone number and delivery address. You can view and edit the personal data in your profile whenever you want.

1.3. Payment information: payment information when processing your orders; card data will be processed by our electronic payment service providers, who will receive the data directly from you. Dancing Drops will have access to this information only to process the request of any competent authority.

1.4. Additional information: any type of information you may provide to Dancing Drops for other purposes, such as your photograph or billing address if you have requested to receive invoices.

1.5. Information from previous communications with Dancing Drops: information provided by you to resolve any query or complaint regarding the operation of the platform, whether through the contact form, by email, or by phone via customer service.

1.6. Information relating to accidents, damage, or loss: this will be processed only when an incident, claim, or insured event occurs, and only to the extent necessary to manage the case with the affected persons, suppliers, and insurance companies.

1.7. Information from conversations held with Dancing Drops: calls will not be recorded at launch. Queries and incidents received by email, phone, or messaging may be documented in writing to the extent necessary to provide assistance and manage incidents. If call recording is activated in the future, the data subject will be informed before the recording begins, and the retention period indicated in Section 10 will apply.

1.8. Internal chat system: this functionality will not be active at launch. If enabled in the future, communications between Users and Couriers (Mandatarios) will be private, and Dancing Drops will only access them when strictly necessary to provide support, resolve incidents or claims, comply with legal obligations, or protect the safety of the parties.

1.9. Any additional information you provide in your requests, comments, or questions.

2. Information provided indirectly by users:

2.1. Data derived from the use of the platform: Dancing Drops collects data derived from your use of the platform each time you interact with it.

2.2. Application and device data: Dancing Drops stores data on the device and application you use to access the services.

2.3. User origin data: if you arrive at the Dancing Drops platform through an external source (for example, a referral link, a promotional code, or an advertising campaign), Dancing Drops will collect technical data about that source of origin, such as the referring URL or campaign tracking parameters.

2.4. Data derived from incident management: if you contact the Dancing Drops platform through the contact form, we will collect the messages received in the format you use, and they may be used and stored for the management of current or future incidents.

2.5. Data from cookies: Dancing Drops may use its own cookies and, once the consent panel is implemented, analytics tools such as Google Analytics. Non-essential cookies shall not be activated until the User has given their consent, in accordance with the Cookie Policy.

2.6. User geolocation data: at launch, Dancing Drops will not carry out continuous or real-time tracking of the User. Location will only be collected when the User expressly authorizes it through device permissions to facilitate the identification of the pickup or delivery address. The User may withdraw permission at any time from their device settings or by manually entering the address.

2.7. Data from third parties:

- Dancing Drops collects personal data or confirmation from external third parties only if you authorize such third parties to share that information with Dancing Drops. For example, if you create an account through your social media or Google account, these platforms could disclose to us the personal data found in your profile.
- If you decide to send us messages from social media, we will collect the information you provide us for the purposes set out in this privacy policy, including responding to your query, providing customer assistance, and troubleshooting.

2.8. At Dancing Drops, your privacy is our priority. We want to remind you that Dancing Drops will never ask you for an ID (DNI) or related documents to verify your identity. Instead, we use secure and less intrusive methods to ensure your privacy. If you ever receive a request for personal documentation, such as an ID or any other related document, do not share it. In these cases, you can write to us immediately so we can help you check it.

3.1.III. Recipients of the data

Dancing Drops guarantees that all its commercial partners, technical partners, suppliers, or independent third parties contractually agree to process the information shared with them in accordance with Dancing Drops' instructions, this privacy policy, and the General Data Protection Regulation.

We will not disclose your personal data to any third party that does not act under our instructions, and no communication will involve the sale, rental, sharing, or disclosure of customers' personal data for commercial purposes, to the detriment of the commitments assumed through this privacy policy.

When placing an order, data may be shared with:

- The courier (mandatario) performing the task of picking up and delivering the product
- The establishment or premises in charge of the service. If you contact the aforementioned providers directly and provide them with your data directly, Dancing Drops will not be responsible for the use these providers make of the data thus provided.
- Customer service providers hired by Dancing Drops for the purpose of warning you of possible incidents or asking you for the reason for a negative assessment; personal data will be used to manage incidents that occur during the provision of services.
- The payment platform and payment service providers so that the amount is charged to your account.
- Telecommunications service providers, when used to send communications about orders or incidents related to them.
- Providers providing satisfaction survey services on behalf of Dancing Drops.

To continue providing the services offered through the Platform, Dancing Drops may share your personal data with:

- **Service providers:** service providers who send packages, carry out orders, and/or resolve delivery incidents have access to your personal information exclusively to the extent necessary to perform their functions. They must process this personal information as provided in this Privacy Policy and in applicable data protection legislation.
- **Payment service providers:** When you enter your card number in the App, it is directly stored by the Payment Platforms contracted by Dancing Drops, allowing the payment to be charged to your account. The payment service providers have been chosen based on their security measures and, in any case, complying with the security measures stipulated in payment services legislation, which comply with PCI regulations according to the Payment Card Industry Data Security Standard or PCI DSS. Dancing Drops does not store this data under any circumstances.
- **Fraud control service providers:** Dancing Drops will share your data with fraud control service providers to assess the risk of the transactions made.
- **Service providers for the anonymization of some personal data:** In order to prevent the misuse of your data by third-party service providers, your data may be anonymized so that it can be used solely for the provision of the service.

- **Security companies and Law Enforcement Agencies:** Dancing Drops may disclose the personal data of its customers' accounts if such disclosure is necessary to comply with the law, to enforce or apply the "Terms of Use", or to protect the rights, property, or safety of Dancing Drops, its users, or third parties. This includes exchanging information with other companies and organizations and with Law Enforcement Agencies to protect against fraud and reduce credit risk.
- **Call center and incident management services:** In order to provide Customer Service, measure your level of satisfaction, and provide administrative support services, your data may be communicated to providers located outside the European Economic Area. In such cases, Dancing Drops will ensure that transfers are made under the legally provided mechanisms in Art. 46 GDPR (standard contractual clauses or current adequacy decisions), as detailed in Section 7.
- **Telecommunications services:** In order to provide telephone contact services to you, Dancing Drops may contact telecommunications companies that provide secure lines and systems in order to contact you.

- **Social networks connected by users:** If you connect your Dancing Drops account to other social networks or a third-party platform, Dancing Drops may use the information provided to those social networks or third parties, in accordance with the privacy policy of the relevant social network or third-party platform.
- **Third parties associated with Dancing Drops for commercial communications purposes:** Dancing Drops may transfer your personal data to third parties associated with Dancing Drops, provided that you have given your express, informed, and unequivocal consent to such data transfer and that you know the purpose and recipient of the same.
- **Changes in ownership:** If the ownership of Dancing Drops changes or the majority of its assets are acquired by a third party, you are informed that Dancing Drops will transfer your data to the acquiring organizations so that they can continue providing the services subject to data processing.

As Dancing Drops continues to grow, we may buy or sell business units, assets, shares, or legal entities, so the personal data of their owners may also be transferred. When Dancing Drops obtains such personal data, it will be processed as described in this Privacy Policy. We inform you that such transfer may occur and that the new data controller may use your personal data for any of the purposes described in this Privacy Policy. The new data controller will comply with its information duty in accordance with Article 14 of the GDPR, informing users of its identity and any relevant changes in the processing conditions. Such transfer will be carried out within the framework of an agreement signed between the parties.

- **Insurance companies:** Dancing Drops may provide your data to those insurance companies and agencies with which it collaborates for the management and processing of claims and losses derived from the activity carried out by Dancing Drops and the subjects who collaborate with it.

3.2. COURIER (MANDATARIO) Information

3.2.1. Purposes and bases of legitimization for the processing of personal data

Dancing Drops will process your personal data for the following purposes:

- For legal purposes
- For contractual purposes
- For security reasons
- For statistical and research purposes

Legal purposes:
Dancing Drops processes your personal data to:

i) Detect and investigate fraud and potential crimes committed against our platform and its users.

ii) Comply with applicable legislation in case any legal regulation requires us to retain your data for a period of time.

iii) Manage and fulfill your requests to exercise the rights established in the GDPR and local regulations.

iv) Bring, file, and defend legal actions against us.

v) Manage and fulfill your claims related to an order, delivery problems, and different types of general incidents generated by the use of the platform.

Contractual purposes
Dancing Drops processes your personal data to:

i) Manage the activity of Dancing Drops, allowing you to access and communicate with the Dancing Drops platform to provide your services through it.

ii) Provide you with informative sessions prior to the start of the services and comply with the services offered by providers through the technological platform, as well as the obligations arising from the contractual relationship.

iii) Study the use you make of the platform and the performance of discussion groups with which you interact to know your opinion and receive comments on the services provided.

iv) Provide you with the necessary equipment and material for the provision of services, if you request it.

v) Activate and manage insurance only when a loss, damage, accident, casualty, or other covered event occurs during the provision of the service.

vi) Assign orders to you and show customers your position when delivering their orders.

vii) Help you during the provision of services to contact customer service centers.

viii) Notify you of changes or updates to our services, terms and conditions, privacy policy, cookie policy, and any other document that may substantially affect you.

Security purposes
Dancing Drops processes your personal data to:

i) Use device, location, profile, usage, and other data to prevent and detect improper payments and money laundering, especially when paying in cash (legal basis: legal obligation, art. 6.1.c) GDPR).

ii) At the request of any authority, administrative or judicial, to collaborate with Public Authorities whenever they ask Dancing Drops for useful information for the purpose of their investigation.

iii) Defend Dancing Drops' interests in cases of conflict between the parties related to the interpretation or execution of the contract.

iv) Comply with remunerative, accounting, tax, and economic obligations.

Statistical and research purposes
Dancing Drops processes statistics based on your personal data to:

i) Perform statistical and financial calculations based on delivered and non-identified data.

ii) Send optional satisfaction questionnaires or surveys after the service is provided. Whenever possible, they will be carried out anonymously; when they involve personal data, participation will be optional, and the corresponding purpose will be reported.

3.2.11. Types of Courier data and method of collection

Dancing Drops has the following data about you:

i) Name and surname: follow-up of the contractual relationship

ii) Identity document (DNI/NIE/Passport): follow-up of the contractual relationship, billing, and compliance with legal regulations.

iii) Bank and billing data: information for billing purposes, checking account or credit card numbers, if necessary to comply with contractual obligations and public safety.

iv) Photo: road safety, account fraud prevention, and public safety.

v) Image: video surveillance, account fraud prevention, and public safety.

vi) Voice (without biometrics) from Customer Service calls: for follow-up of the contractual relationship and compliance with legal regulations.

vii) Signature: follow-up to the contractual relationship.

viii) Face: facial biometric model (special category data pursuant to art. 9.1 GDPR). Its processing will only take place within the framework of the authentication process described in Section 3.2.III, when such functionality is activated. Until then, this data is not subject to active processing. The legitimizing basis of art. 9.2 GDPR applicable will be determined and declared prior to activation, following compliance with the impact assessment (DPIA) required by art. 35 GDPR.

ix) Date of birth: compliance with legal rules.

x) Residence data: compliance with legal rules.

xi) Insurance and claims data: will be processed only when there is a loss, damage, accident, claim, or other insured event.

xii) Driver's license: road safety.

xiii) Own vehicle: follow-up of the contractual relationship.

xiv) Vehicle insurance: follow-up of the contractual relationship

xv) Courier Geolocation: it will be used only while the Courier is available for a service or executing an assigned pickup or delivery, in order to assign orders, inform about the status of the service, manage safety, and resolve incidents. Tracking must be disabled when not necessary for the provision of the service.

xvi) Phone number and email: Follow-up of the contractual relationship and communication with the Courier by sending some communications through different channels.

xvii) Internet connection data (IP address and application access logs): follow-up of the contractual relationship and detection of unauthorized or fraudulent access to the Courier's account (legal basis: contractual execution, art. 6.1.b) GDPR, and legitimate interest, art. 6.1.f) GDPR).

xviii) Information on conversations with Couriers: calls will not be recorded at launch. Incidents and communications may be documented in writing to the extent necessary to provide assistance, ensure safety, and resolve claims. If recording is activated in the future, the Courier will be informed before its start.

3.2.III. Regarding the possibility of establishing an authentication process

Dancing Drops informs Couriers that the process of connecting to the APP for the provision of their professional services may be supplemented in advance by an authentication process necessary to verify that the person providing the service is really the Courier, is a party to the contract, and their identity has not been impersonated by a third party. If implemented, said authentication process will consist of facial recognition in which the biometric facial pattern from the Courier's identification document photograph will be compared with the facial pattern constituted by the different "selfie" photos requested from the Courier when connecting to the Dancing Drops APP. As an alternative to the automated process, the Courier may request a manual identity verification. In this case, an agent will verify the delivery person's identity by comparing a newly submitted photograph with visual records previously stored by the company. Currently, this functionality is not active, with Dancing Drops reserving the right to enable it when deemed necessary to ensure platform security.

The purpose of this process is to prevent the impersonation of the Courier in the execution of the contract, that is, that the Courier obligated to the contractual provision is replaced by another person considering that the impersonation of one of the essential parties in the contract can cause a high risk for the parties involved in case of commission of crimes against the end user, against the Partner businesses of our APP, and against Dancing Drops and/or third parties.

This data processing is therefore based on 1) the legitimate interest of Dancing Drops, in accordance with article 6.1.f) GDPR to prevent identity theft and fraud to customers and businesses, as well as to verify that the Courier is who they say they are, since the service can only be provided by the Courier and not another person who is not a party to the service provision contract, as well as 2) the legitimate interest of the Courier in accordance with article 6.1.f) GDPR to offer maximum confidence to customers and Dancing Drops by having passed a registration, selection, and authentication process, as well as to prevent breaches and crimes committed by another person spoofing their identity from being attributed to the Courier, 3) the contractual execution between Dancing Drops and the Couriers, in accordance with article 6.1.b) of the GDPR, with Dancing Drops complying with its obligation to prevent culpa in eligendo and culpa in vigilando of its suppliers, the legal obligation applicable to Dancing Drops, in accordance with article 6.1.c) of the GDPR, as guarantor of the prevention of crimes and damages that may be committed to the users of the platform due to the delivery services provided by the Couriers, and 4) the public interest of crime prevention provided for in article 6.1e) of the GDPR.

The Courier's personal data that will be processed by Dancing Drops within the framework of this authentication process: (1) identification data: name and surname, DNI or passport number, photograph of the DNI or passport, gender, nationality, date and place of birth, (2) contact details: address, phone, email, and (3) biometric data: facial pattern, will be retained until the date on which the contractual relationship with the Courier has been terminated or the professional relationship with the Courier has expired and may be kept for the maximum period in force in the country where the Courier has provided their professional services, for the defense and filing of claims by Dancing Drops.

Likewise, Dancing Drops informs Couriers that the data may be processed by external service providers, who will act as data processors, in accordance with data protection regulations, so that said providers provide registration and authentication services to Dancing Drops. The relationship between Dancing Drops and these providers will be regulated by a data processing agreement, in accordance with the provisions of applicable data protection regulations. Likewise, Dancing Drops will ensure that any provider involved in data processing offers sufficient guarantees regarding the application of security measures, continuity of service, and adequate mechanisms to protect the information. If the services provided by this provider involve international data transfers, Dancing Drops will ensure that these are carried out in accordance with legally established mechanisms, including standard contractual clauses, adequacy decisions, or additional guarantees that may be required.

Within the framework of this data processing commission, Dancing Drops will adopt all appropriate security measures to protect the personal data of the Couriers and will ensure that the recipient of the data complies with the security requirements and criteria necessary for such processing and adopts and implements, prior to any data transfer, a series of corporate policies in order to comply with current regulations in this area in the European Union.

Finally, Dancing Drops indicates to Couriers that this processing activity, considering its specific way of being carried out, would not imply the adoption of automated decisions. Thus, if an error were to occur in the authentication process, the immediate intervention of an operator will always be foreseen to determine and resolve the error. Therefore, the authentication process will always be the result of human intervention.

Furthermore, profiling activities will in no case be carried out, since predictions about the behavioral aspects of the Couriers will not be analyzed or made.

The Courier finally acknowledges and agrees to have received all the information regarding the possible authentication modality with biometric data for anti-fraud purposes, prior to the start of said processing activity, so that they have been able to choose between the online authentication methodology required by Dancing Drops and that of other companies, being at all times free and with knowledge of the details of the processing of their personal data.

3.2.IV. RECIPIENTS OF THE DATA

Dancing Drops guarantees that all its commercial partners, technical partners, suppliers, or independent third parties contractually agree to process the information shared with them in accordance with Dancing Drops' instructions, this privacy policy, and the General Data Protection Regulation.

We will not disclose your personal data to any third party that does not act under our instructions, and no communication will involve the sale, rental, sharing, or disclosure of customers' personal data for commercial purposes, to the detriment of the commitments assumed through this privacy policy.

The data may be shared with:

- Establishments with which Dancing Drops has a commercial contract.
- Users who have placed an order whose delivery will be carried out by the Courier.
- External service providers that offer commercial offers with advantages and/or discounts for Couriers.
- Advisors and consultants for the exercise of accounting, labor, tax, insurance, legal, and technical activities.
- Government agencies.
- State security forces, courts, and mediation and arbitration bodies.
- Satisfaction surveys on behalf of Dancing Drops.

The data may also be transferred inside and outside the European Union to companies or third parties in charge of archiving and managing computer data, solely for purposes related to the management of the contractual relationship between the parties and in full compliance with applicable data protection legislation. Dancing Drops informs that it has taken the necessary measures so that the disclosure of your data is carried out in accordance with the aforementioned legislation.

3.3. PARTNER INFORMATION

3.3.1. Purposes and bases of legitimization for the processing of personal data

Dancing Drops will process your personal data for the following purposes:

- Grant the possibility of creating your own account and maintaining the commercial relationship with Dancing Drops in order to provide you with technological intermediation for the generation of potential clients and the processing of payments and other services, as well as to manage incidents arising in the contractual relationship (legal basis: contractual execution, art. 6.1.b) GDPR).
- Provide you with customer service to answer your questions or queries.

3.3.11. Types of User data and method of collection

Dancing Drops has the following data about you:

- Registration data: the information provided by you when you create an account on the Dancing Drops platform: username and email.
- User profile information, phone number, and email: monitoring of the commercial relationship and to be able to communicate with the Partner by sending communications.
- Information on conversations with Dancing Drops: calls will not be recorded at launch. Queries and incidents may be documented in writing. If call recording is activated in the future, the interested party will be informed before it starts, and the recordings will generally be kept for 90 days, unless they must be kept longer due to a claim, incident, legal obligation, or judicial procedure.
- Any additional information you provide in your requests, comments, or questions.

3.4. PROSPECTIVE CLIENT INFORMATION

3.4.1. Purposes and bases of legitimization for the processing of personal data

Dancing Drops will process your personal data for the following purposes:

- Process requests to obtain the services offered by Dancing Drops and manage the possible relationship between both parties.
- Carry out marketing, communication, and research activities on Dancing Drops services, after obtaining the express consent of the prospective client (legal basis: art. 6.1.a) GDPR and art. 19 LSSI-CE). The prospective client may revoke their consent at any time, free of charge, following the unsubscribe instructions included in each communication or by writing to the privacy email indicated in Section 1.

3.4.11. Types of User data and method of collection

Dancing Drops has the following data about you:

- Registration data: the information provided by you when you request information about our services.
- Any additional information you provide in your requests, comments, or questions.

3.5. WEBSITE VISITOR INFORMATION

3.5.1. Purposes and bases of legitimization for the processing of personal data

Dancing Drops will process your personal data for the following purposes:

- Keep track of your comments on the Dancing Drops Website. This may include, based on your consent, notification of new comments on the article commented on by you, and information on new updates to our website.
- Provide you with an answer to your requests and queries.

3.5.11. Types of User data and method of collection

Dancing Drops has the following data about you:

- Registration data: the information provided by you when you request information about our services.
- Any additional information you provide in your requests, comments, or questions.
- Data derived from cookies: Dancing Drops uses its own and third-party cookies to facilitate the navigation of its users and for statistical purposes, which you can review in the Cookie Policy.

4. PROCESSING OF PERSONAL DATA ON DANCING DROPS WEBSITES OR APPLICATIONS

The platform may incorporate ratings, comments, and an internal chat system between Users and Couriers in the future. These functionalities will not be active at launch. Before their activation, Dancing Drops will update the applicable information and configure the corresponding privacy controls.

If the internal chat system is activated in the future, it will be private. Dancing Drops will access its content only when strictly necessary to provide support, resolve incidents or claims, comply with legal obligations, or protect the safety of the parties. Generally, chat records will be kept for 12 months, unless they must be kept longer due to a claim, incident, legal obligation, or judicial procedure.

5. PROTECTION OF PERSONAL DATA

We work hard to protect your personal data. We use administrative, technical, and physical security controls appropriate to the risk of processing, such as encryption of data in transit and at rest, two-step

verification for access to the platform, and contractual confidentiality obligations for employees, collaborators, and processors. In compliance with the principle of privacy by design and by default (art. 25 GDPR), Dancing Drops integrates data protection measures into the design of its systems and processes from their conception. Dancing Drops maintains a Record of Processing Activities in accordance with art. 30 GDPR. In the event of a security breach that poses a risk to the rights and freedoms of the interested parties, Dancing Drops will notify the Spanish Data Protection Agency within 72 hours of becoming aware of it (art. 33 GDPR) and, when the risk is high, will directly inform the affected parties without undue delay (art. 34 GDPR).

6. STORAGE OF PERSONAL DATA

Your personal information is stored on servers preferably located within the European Economic Area. When Dancing Drops hires service providers whose servers are located outside the EEA, it guarantees that the processing is carried out under the appropriate guarantees described in Section 7 of this Policy.

7. TRANSFER OF PERSONAL DATA OUTSIDE THE EUROPEAN UNION

Some of the service providers that Dancing Drops uses to provide its services are established outside the European Economic Area (EEA) or store data on servers located outside the EEA. In these cases, Dancing Drops guarantees that any international transfer of personal data is carried out in accordance with one of the mechanisms legally provided for in Chapter V of the GDPR: a) European Commission adequacy decision: for transfers to countries with a current decision (e.g., United Kingdom, Switzerland, Japan, Canada, Israel, New Zealand, South Korea). b) EU-US Data Privacy Framework (DPF): for transfers to providers established in the United States that are certified in the DPF, in force since July 2023. c) Standard Contractual Clauses (SCCs): for transfers to providers established in countries without an adequacy decision and not certified in the DPF, in accordance with the European Commission's Implementing Decision (EU) 2021/914, supplemented where necessary by additional technical and organizational measures.

The categories of providers that may process data or involve international transfers include: Contabo for hosting and infrastructure; Supabase/PostgreSQL for database and technical services; Stripe for payment processing; Google for analytics services, only when the corresponding cookie consent mechanism has been implemented; email services associated with support@dancingdrops.com; and communication and customer service services through the number +34 666 689 836. Dancing Drops will not use custom Google or Meta audiences at launch or send customer lists to these platforms. When a provider processes data outside the EEA, Dancing Drops will apply the mechanism provided for in this Section 7 and maintain an internal register of providers and guarantees available at the request of the interested party at privacy@dancingdrops.com.

8. USER RIGHTS OVER THEIR OWN PERSONAL DATA

Where applicable law provides, you may have the right to request a copy of your personal information from us, to correct, delete, or restrict processing (and stop any active processing) of your personal information, to obtain the personal information you provide to us for a contract or with your consent in a structured, machine-readable format, and to ask us to share (port) this information to another controller. You may have additional rights under applicable privacy laws in your jurisdiction. In

addition, you can object to the processing of your personal information in some circumstances (such as when we use the information for direct marketing).

These rights may be limited, for example, if fulfilling your request would reveal personal information about another person, or if you ask us to delete information which we are required by law to keep or have compelling legitimate interests in keeping (such as for defending against claims).

Dancing Drops will address your request within a maximum period of one month from its receipt, extensible by an additional two months in cases of special complexity, upon prior notification to the interested party (art. 12.3 GDPR). To exercise any of these rights (including deactivating your Dancing Drops account), you can contact Dancing Drops by writing to privacy@dancingdrops.com. Additionally, many of our Services allow you to edit your personal information by accessing the "My Profile" feature or other similar features of the service you are using. You can also delete files or photos you have saved in our Services and Software by logging in and using the available deletion features.

If you have unresolved concerns, you have the right to report them to your local privacy regulator or data protection authority and, where applicable, you will also have the right to lodge a complaint with Dancing Drops' lead supervisory authority.

When asked to provide personal information, you may decline. In addition, you can use web browser or operating system controls to prevent certain types of automatic data collection. However, if you choose not to provide or allow the use of information that is necessary for certain services or features, those services or features may not be available or fully functional.

9. CATALOG OF USER RIGHTS

In addition to the above rights, the User has the right to exercise the rights that assist them in matters of data protection in accordance with applicable regulations. To this end, we commit to ensuring the exercise of your rights in a transparent manner. In this regard, you are informed that the User may exercise the following rights:

- **Access to your data:** The User has the right to obtain confirmation as to whether at Dancing Drops we are processing personal data concerning them and, if so, to access such data.
- **Rectification or deletion of your data:** Under certain circumstances, the User has the right to rectify inaccurate personal data concerning them that are subject to processing by us or even to request their deletion when, among other reasons, the data are no longer necessary for the purposes for which they were collected.
- **Limitation of the processing of your data:** Under certain circumstances, the User has the right to request the limitation of the processing of their data, in which case we inform you that we will only keep them for the exercise or defense of claims.
- **Portability of your data:** Right to receive the personal data concerning them, which they have provided to us, in a structured, commonly used and machine-readable format, and to transmit them to another data controller.
- **Opposition to the processing of your data:** Under certain circumstances and for reasons related to their particular situation, the User shall have the right to object to the processing of their data, in which case, we would stop processing them unless there are compelling legitimate grounds, or for the exercise or defense of possible claims.
- **Right not to be subject to individual automated decisions:** The User has the right not to be subject to a decision based solely on automated processing, including profiling, which produces legal effects on them or similarly significantly affects them (art. 22 GDPR). In the context of Dancing Drops, the platform may use automated processes for order assignment and service recommendation; however, these decisions do not produce legal effects or significantly affect the user within the meaning of art. 22 GDPR. The Courier authentication system, when active, always incorporates human intervention, so it does not constitute a fully automated decision.
- **Withdrawal of consent:** If the User has provided their consent for the processing of their personal data for any of the purposes described in this Policy, they may withdraw it at any time, without this affecting the lawfulness of the processing based on consent prior to its withdrawal. Withdrawal is as simple as granting consent: it can be done by accessing the privacy settings of your account in the application, or by writing to privacy@dancingdrops.com.

The User may exercise the referenced rights in the terms provided in the data protection regulations by sending a communication to privacy@dancingdrops.com, indicating the right they wish to exercise and providing, when necessary, the information reasonably required to verify their identity.

Similarly, the User may file the claims they deem appropriate before the competent supervisory authority.

10. PERSONAL DATA RETENTION TIME

When you register for an account and create a profile on Dancing Drops, we process and retain most of the personal information we process on your behalf, as long as you actively use our Services. We delete certain information we collect about you when we no longer have a commercial reason to retain it. In addition, there is some personal information that we need to retain even after you close your account, to comply with legal and corporate requirements, such as personal information related to our contract and our business transactions with you.

When we process personal information for commercial purposes or with your consent, we process the information until you ask us to stop doing so, but we continue doing so for a short period after this (to be able to implement your requests). We also keep a permanent record of the fact that you have asked us not to send you direct marketing or not to process your information, so that we can respect your request in the future.

GENERAL DATA RETENTION PERIODS

	Period	**Description**	**Legal Ref.**
Data Protection	3 years	The statute of limitations for offenses are: - Very serious: after 3 years - Serious: after 2 years - Minor: after 1 year	Organic Law on Data Protection
Personal actions in civil matters	5 years	Personal actions that do not have a special period prescribe after five years from when the fulfillment of the obligation can be demanded. In continuous obligations to do or not to do, the period will begin each time they are breached.	Spanish Civil Code, art. 1964.2
Accounting and tax documentation	6 years	For commercial purposes: books, correspondence, documentation and receipts concerning your business, duly ordered, for six years, starting from the last entry made in the books, except as established by general or special provisions. This obligation applies to mandatory books, as well as documentation and supporting documents for the entries contained in the books.	Commercial Code

Relevant information for criminal actions	4 years 10 to 15 years	For tax purposes: accounting books and other mandatory registration books in accordance with applicable tax legislation, as well as documentary evidence justifying entries in the books must be kept at least during the period in which the tax authorities have the right to verify and investigate and, therefore, to assess and report the tax due. Any information and documentation that may be relevant for the prosecution or defense of criminal proceedings related to the criminal liability of legal persons, according to the Criminal Code (LO 10/1995) and the Criminal Procedure Law (LECrim). This may include invoices, receipts, claims or complaints, delivery routes with geolocation, tax documentation and, in general, any other information of any personal data subject that may be useful to defend the legal interests of Dancing Drops or the interested parties.	General Tax Law 58/2003 of December 17, Section 3, arts. 66 to 70.

USERS

	Period	**Description**	**Legal Ref.**
Users and consumers	3 years	Claims to demand compliance with the service as a result of a lack of conformity with the contract prescribe three years after the delivery of the product.	Royal Legislative Decree 1/2007, of November 16, approving the revised text of the General Law for the Defense of Consumers and Users and other complementary laws, art. 124.
Electronic commerce and information society services	3 years	The statute of limitations for offenses are: - Very serious: 3 years - Serious: after 2 years - Minor: after 6 months	Law 34/2002, of July 11, on Information Society Services and Electronic Commerce, art. 45.
Money laundering	10 years	Documents formalizing compliance with the obligations provided by law	Law 10/2010, of April 28, on the Prevention of Money Laundering and Terrorist Financing, art. 25.
User Geolocation	Up to 90 days	The optional location used to facilitate a pickup or delivery will be deleted or anonymized when it is no longer necessary and, generally, within a maximum period of 90 days. It may be kept longer if it is linked to a claim, incident, legal obligation or judicial procedure.	Art. 5.1.e) GDPR
Chat records (if activated)	12 months	Chat records will generally be kept for 12 months from the communication, unless they must be kept longer due to a claim, incident, legal obligation or judicial procedure.	Art. 5.1.e) GDPR

Call recordings (if activated)	90 days	Recordings will generally be kept for 90 days, unless they must be kept longer due to a claim, incident, legal obligation or judicial procedure.	Art. 5.1.e) GDPR

COURIERS (MANDATARIOS)

	Period	**Description**	**Legal Ref.**
Commercial agreements or contracts	6 years	The agreements signed between the Courier and Dancing Drops to regulate their commercial relations.	Commercial Code, art. 30
Users and consumers	3 years	Claims to demand compliance with the service as a result of a lack of conformity with the contract prescribe three years after the delivery of the product.	Royal Legislative Decree 1/2007, of November 16, approving the revised text of the General Law for the Defense of Consumers and Users, art. 124
Electronic commerce and information society services	3 years	The statute of limitations for offenses are: - Very serious: after 3 years - Serious: after 2 years - Minor: after 6 months	Law 34/2002, of July 11, on Information Society Services and Electronic Commerce, art. 45.
Couriers Geolocation	90 days	Location data linked to a pickup or delivery will generally be kept for 90 days. They may be kept longer if they are linked to a claim, security incident, fraud investigation, legal obligation or judicial procedure.	Art. 5.1.e) GDPR

11. CHANGES TO THE PRIVACY POLICY

Occasionally, we may update this Privacy Policy to adapt it to new technologies, industry practices, regulatory or statutory changes, or for other purposes. If we do so, we will change the "last updated" date at the top of this policy, and the revised policy will be posted on this page so that you are aware of the information we collect, how we use it, and under what circumstances we may disclose it. We recommend that you regularly review our privacy policy for the latest information on our privacy practices. Under certain circumstances (for example, with certain material changes or where required by applicable privacy laws) we will notify you of these changes and, where required by applicable law, obtain your consent. Notice may be sent to you by email, by posting a notice of such Services, or by other means in accordance with applicable law.