

## Privacy Policy

For the sake of compliance with **Regulation (EU) 2016/679 of the European Parliament and of the Council, of April 27th, 2016**, regarding the protection of natural persons with regard to the processing of personal data and the free circulation of these data, as well as **Organic Law 3/2018, of December 5th, on Protection of Personal Data and Guarantee of digital rights**, this privacy policy is developed.

The necessary technical and organizational measures are adopted at all times to guarantee the security and integrity of the personal data it deals with, as well as to prevent its loss, alteration and/or access by unauthorized third parties.

### 1. Who is responsible for data processing?

HUMAN ANALYTICS (B-52555307)

Parque Científico Tecnológico de Gijón

C/ Avda. Los Prados, 166 – 33203 GIJON (Asturias) España

Phone: +34 649 694 801

email: [info@spodha.com](mailto:info@spodha.com)

Website Domains: <https://humanalytics.net> ; <https://spodha.com>

### 2. What is the legitimacy for the processing of your data?

By completing the form and accepting the privacy policy, you give your consent, which will be expressly informed in each of the forms or sections of the web where they are required.

The legal basis for the processing of your data is your consent.

The data that is requested through the web in fields marked with an asterisk, are mandatory, since they are necessary for the provision of an optimal service to the user. In the event that not all the data is provided, it is not guaranteed that the information and services provided will be completely adjusted to your needs.

### 3. For what purpose do we process the personal data provided?

- Manage contact with the person concerned through the ways of communication provided in order to resolve the queries sent to us through the channels enabled for this purpose.
- Respond to inquiries and requests that are sent through the contact forms.
- Internal use of personal data for job selection processes, for their incorporation into the HUMAN ANALYTICS Job Bank and for the offer and management of possible job offers or collaboration that may be generated.
- Manage contact with the interested person through the ways of communication provided in order to manage notices and coordinate actions for the management of the selection process by the people responsible for HUMAN ANALYTICS.
- Collection and processing of personal data contained in the CVs registered through the HUMAN ANALYTICS website in order to manage the employment exchange in relation to current and future job offers of the entity.

### 4. How long do we keep your personal data?

HUMAN ANALYTICS, through SPODHA, only keeps your personal data for the time essential and necessary for each purpose of the treatment, without prejudice to the fact that consent can be

revoked at any time, therefore, the period of conservation of your data will depend of the purposes for which we treat them, as established below:

PURPOSE	CONSERVATION PERIOD
Manage contact with the person concerned through the ways of communication provided in order to resolve the queries sent to us through the channels enabled for this purpose:	As long as the relationship of lawfulness of treatment is maintained or the interested person does not request its deletion.
Management of contact with the interested person through the ways of communication provided in order to manage notices and coordinate actions for the management of the selection process by the people responsible for HUMAN ANALYTICS:	12 months from receipt, in order to keep them updated, without prejudice to the fact that you exercise your right to object beforehand or revoke your consent. In the event that the person is hired, the data will be kept during the term of the contract, except for the retention periods established in the sectoral regulations.
Collection and processing of personal data contained in the CVs registered through the HUMAN ANALYTICS website in order to manage the employment exchange in relation to current and future job offers of the entity:	12 months from receipt, in order to keep them updated, without prejudice to the fact that you exercise your right to object beforehand or revoke your consent. In the event that the person is hired, the data will be kept during the term of the contract, except for the retention periods established in the sectoral regulations.

## 5. Recipients

The data will not be communicated to third parties, except in the cases of those in charge of treatment of entities contracted or subcontracted for the execution of certain activities, for the same purposes described in the purpose section and with which the corresponding contract is formalized according to the regulations on data protection.

## 6. Rights of the interested party

The interested person may exercise the following rights:

- Right to request access to your personal data.
- Right of access to your personal data, as well as to request the rectification of inaccurate data or, where appropriate, request its deletion.
- Right to request the limitation of the processing of your data.
- Right to object to the processing of your personal data.
- Right to the portability of the data by which they can obtain the personal data that concern them in a structured format of common use and mechanical reading and to transmit them to another person in charge.
- Right to withdraw the consent given, at any time.

These rights may be exercised by going to the email address [info@spodha.com](mailto:info@spodha.com), having to prove the identity and indicating the right to be exercised.

## 7. Modification in the privacy policy:

HUMAN ANALYTICS reserves the right to make as many modifications, variations or deletions in the contents and form of this privacy policy in order to adapt it to new legislation or jurisprudence. In such cases, these variations will be notified via contact email.

## 8. Summary of data privacy

### Collection and sale of data

- Do we sell your personal information? **No**
- Do we share aggregated information? **Yes**
- Do we share your data with third-party API (Application Programming Interface) partners? **Yes, with your consent**
- Do we use categories of sensitive data, such as health information? **Yes, with your consent**
- Do we use your contact list if you allow us access? **Yes**
- Do we delete your data when you request to delete the account? **Yes**
- Do we keep your data for as long as we need it, unless you request its deletion? **Yes**

### Privacy tools and controls

- Can you control who sees your activity and content? **Yes**
- ¿Puede usted controlar quién ve su actividad basada en la ubicación? **Sí**
- Can you control who sees your activity based on location? **Yes**
- ¿Los controles de privacidad están configurados en "Todos" de forma predeterminada? **Sí**
- Are the privacy controls set to "All" by default? **Yes**
- Can you download and delete your data? **Yes**
- Do all members around the world have the same set of tools and controls? **Yes**

### Tracing

- Do we track the location of your device to offer you SPODHA? **Yes**
- Do we keep track of the location of your device while you are not using the application? **No**
- Do we use cookies? **Yes**
- Do we track your browsing activities on other sites? **No**
- Can we hear you with the microphone of your device? **No**

### Communication

- Do we notify you in advance when we make important changes to our Privacy Policy? **Yes**
- Do we send you commercial communications with the option to unsubscribe? **Yes**
- Do we send you push notifications with the option to unsubscribe? **Yes**