

Privacy Policy

In compliance with personal data protection regulations and in accordance with Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data (GDPR), as well as Organic Law 3/2018 of 5 December on the Protection of Personal Data and the Guarantee of Digital Rights (LOPDGDD), NUMEN GAMES S.L. (“NUMEN”) provides the following information so that you are aware of all relevant aspects related to the processing of your personal data.

1. Who is responsible for processing your data?

- **Company name:** NUMEN GAMES S.L.
 - **Tax ID (CIF):** B70735949
 - **Registered address:** Calle Chile 10, Las Rozas, Madrid, Spain
 - **Email address:** gm@numengames.com
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2. When do we collect your personal data?

Your personal data may be collected in the following situations:

- **Through contact and/or registration forms:**
Our website includes different forms that request various types of data for different purposes, such as contacting us, requesting a demo, among others.
 - **Through cookies:**
Our website installs cookies that collect information about your browsing activity. We recommend that you read our Cookie Policy for full information in this regard.
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3. For what purposes and on what legal basis do we process your data?

Your personal data will be processed for the following purposes:

1. **To assist, manage, and respond to requests, comments, and/or inquiries.**
Processing is based on your consent when submitting a request or inquiry (Article 6(1)(a) GDPR), and/or on the execution of a contractual relationship or the application of pre-contractual measures (Article 6(1)(b) GDPR).
 2. **To send information about services, promotions, and products related to our activity,** provided that you have given your consent. Communications may be sent via the means you have provided (telephone, postal mail, email, SMS, and/or messaging systems, among others).
The legal basis is your consent (Article 6(1)(a) GDPR).
 3. **To comply with legal obligations, court rulings, and decisions issued by competent authorities.**
This includes the disclosure of personal data to law enforcement authorities when there are indications or suspicions of unlawful or criminal activity.
The legal basis is compliance with a legal obligation (Article 6(1)(c) GDPR).
 4. **To carry out anonymous statistical analysis** in order to understand the operation of our products and/or services and to improve their development and personalization.
The processing is based on NUMEN's legitimate interest in managing and improving its products and services (Article 6(1)(f) GDPR), always ensuring that such interest does not override your fundamental rights and freedoms.
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4. How long will we retain your personal data?

Your personal data will be processed for the period necessary to fulfill the purposes set out in this Privacy Policy, as well as to comply with applicable legal and regulatory requirements, particularly with regard to statutory limitation periods, and for the establishment, exercise, or defense of legal claims.

Retention criteria are determined by:

- (a) The purpose for which the data was collected and the fulfillment of that purpose (e.g., for the duration of our relationship);
- (b) The reasons for collecting the data (e.g., where consent is required, you may withdraw it at any time);
- (c) Mandatory storage periods required by contractual or legal obligations.

In certain cases, data may be retained for the time necessary to establish, exercise, or defend legal claims, requirements, responsibilities, and legal and/or contractual obligations, with such data being duly blocked.

5. To whom may your data be disclosed?

Your personal data will not be disclosed to third parties without your express consent. However, depending on the purposes for which personal data is collected, the following parties may have access to such information:

- Authorized employees and/or collaborators of NUMEN, subject to applicable data protection regulations;
- Competent public bodies and authorities, including law enforcement agencies, where required by law or where there are sufficient indications or suspicions of unlawful or criminal activity;
- Third-party service providers acting as data processors. Appropriate data processing agreements have been executed with all such providers in accordance with data protection regulations;
- In the event of non-payment of membership fees, outstanding debts may be communicated to legally authorized third-party entities responsible for managing unpaid financial obligations.

NUMEN does not transfer personal data outside the European Economic Area (EEA). Should such transfers occur in the future, NUMEN will ensure adequate protection through appropriate safeguards, in particular by using standard contractual clauses approved by the European Commission.

6. What are your rights when you provide us with personal data?

When we process your personal data, you have the following rights:

- **Right of access:** to confirm whether NUMEN is processing your data and to access such data;
- **Right to rectification:** to request correction of inaccurate data or completion of incomplete data;
- **Right to erasure:** to request the deletion of your personal data;
- **Right to restriction of processing:** in which case NUMEN will only retain the data for the exercise or defense of legal claims;
- **Right to object:** to request that we stop processing your personal data, except where processing is required for legitimate reasons or for the exercise or defense of legal claims;
- **Right to data portability:** to request the transfer of your data to another data controller, where technically feasible;

- **Right not to be subject to decisions based solely on automated processing,** including profiling.

If you have given your consent for any specific purpose, you may withdraw it at any time without affecting the lawfulness of processing based on consent prior to its withdrawal.

To exercise your rights, you may contact us by email at **hello@startupvalencia.org** or in writing at the postal address indicated in Section 1.

You may also lodge a complaint with the competent supervisory authority, in this case the **Spanish Data Protection Agency (AEPD):**

<https://www.aepd.es>

7. Modifications

We will only process your personal data in accordance with the Privacy Policy in force at the time your data is collected. If NUMEN makes any changes to the processing of personal data, you will be duly informed.

8. Additional information

- **Children's policy:**

Our services are intended exclusively for adults. We do not knowingly collect personal data from minors. If you are a parent, guardian, or legal representative and believe that a minor has provided us with personal data, please contact us at **gm@numengames.com**.

- **Special categories of data:**

NUMEN does not collect or process personal data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, genetic data, biometric data used for unique identification, health data, or data concerning sexual life or sexual orientation.

- **Links:**

The NUMEN website may contain links to other websites that we consider useful or informative. However, we do not endorse or recommend the content or services of such websites, nor are we responsible for their privacy policies. We encourage you to review the privacy policies of any website you visit. This Privacy Policy applies only to data collected and/or processed by NUMEN.

- **Contact us:**

If at any time you believe that we have not complied with the provisions set out in this

Privacy Policy, please notify us by sending an email to **gm@numengames.com**. If you wish to escalate a privacy-related issue or have any questions regarding this Privacy Policy, please contact us at the email address indicated above.