# Privacy policy

From **MIRAI ADVISORY**, **S.L.** (hereinafter, "**MIRAI**" or the "**Controller**"), we want to give you all the details about how we process the personal data you provide to us when interacting with us through our website. Thus, this privacy policy applies to all personal data provided to us by any means, specifically in places where there is a reference to this policy, including the forms provided on this website.

For us, privacy is an essential value, and following the provisions of both 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 and repealing Directive 95/46/EC ("GDPR") and Spanish Organic Law 3/2018, of December 5, on the Protection of Personal Data and guarantee of digital rights ("LOPDGDD"), below we provide you with both basic information and developed information on the processing of your data.

#### 1. Basic information about how we process your data.

Data Controller	<ul> <li>- Company name: MIRAI ADVISORY, S.L.</li> <li>- Registered office: Ponce de León 2, 1°C, 28010, Madrid, Spain.</li> <li>- Spanish Tax ID num. B-86759743.</li> </ul>
Purposes of the processing	Through this website we carry out a part of our activity, and for this, we may use your data to carry out some of the following purposes:  - To manage and improve the service of the website.  - To enable you to contact us and send us queries or requests for information, including receiving your CV if you have sent it to us.  - Through the form "Subscribe to the newsletter", to receive information that may be of interest to you.  - Through the form "Leave a comment in our blog section", to manage the entry in the Blog
Lawfulness of the processing	The processing is based on your consent, validly given by accepting the checkbox indicated in the various forms of contact with us, by contacting us directly through the means indicated, or by accepting the installation of cookies on the website.



#### Your personal data may be communicated to public authorities in **Data recipients** case of legal obligation of the controller or request by such authority. international data transfers No international transfers of personal data are foreseen. Personal data will be retained for as long as necessary to fulfill the purpose to which they are associated. Specially: - For queries or communications sent through the indicated means of contact, we will process the information while these are active. - In the case of CVs received, which we may receive through the means of contact indicated, we will keep them for a period of 2 years as long as you authorize us to do so. **Retention period** - In the case of sending comments on the Blog, or request to receive our newsletter, as long as you do not withdraw your consent. - As for the information collected from your navigation through the website, you have all the information in our Cookies Policy. Subsequently, we may keep them properly blocked for the period of time legally established to defend the interests of MIRAI against claims or legal obligations. You can exercise your rights of access, rectification, erasure and portability of your data, of restriction and objection to their Data subject's processing, as well as not to be subject to decisions based solely rights on the automated processing of your data, where appropriate and before MIRAI, through the mail address qdpr@mirai-advisory.com or through the postal address indicated at the beginning of the text. In case you do not agree with the processing that MIRAI has carried **Data Protection** out on your data or its performance against data access requests, **Authority** you can file a complaint with the Spanish Data Protection Authority (www.aepd.es).



The data that you decide to provide us through any of the enabled means, you provide them freely and you accept that these personal data are subject to the corresponding processing in each case depending on the purpose for which you have provided them to us and thanks to your freely given consent.

In accordance with the provisions of the GDPR, below we provide you with the information regarding the processing of your data that we will carry out more extensively, so that you have all the necessary information to give us your valid consent. Therefore, it is essential that you carefully read the information detailed below.

#### 2. What is the purpose for which we will process your data?

The personal data you provide us in the various means of contact that we offer on our website, we use them to carry out a number of purposes:

- To manage and improve the service of the website, through the installation of cookies if you accept it.
- Through the section "Contact us": The purpose of processing the data you provide (email address etc.) will be to manage your query, provide the information you request about our professional services, answer your questions, and if requested, to present you with an offer of our professional services, including receiving your CV if you have sent it to us.
- Through the form "Subscribe to the newsletter": The purpose of the processing of the data you provide will be to include you in a mailing list for the reception of our newsletter.
- Through the form "Leave a comment in our blog section": The purpose of the data processing will be to manage the entry or comment that you are interested in publishing in our blog.

## 3. What personal data do we process?

In order to achieve the aforementioned purposes, we process the following categories of data:

- Identifying and contact data of the user: name and surname and email.
- Data included in your Curriculum Vitae, in case of contacting us through our means of contact to take you into account in our selection processes.
- Personal data that you may include in your queries.
- Data derived from your navigation through the website.

#### 4. Under what legal basis do we use your personal data?

The legal basis for the processing of your data will be consent, as provided in Article 6.1.a) GDPR.

We need to process your personal information in order to respond to the request for communication or contact sent or to carry out the purpose of any of the forms provided for this purpose. In the same way, and where appropriate, you consent to the use of the installation of cookies on your device.



#### 5. Who do we share your data with?

Your personal data may be disclosed to public authorities if we must comply with a legal obligation or if we receive a request from such authorities.

No international data transfers are foreseen.

In case there is a communication of data, we will ensure that the processing of data is in full compliance with the law, entering into all necessary agreements to ensure that the flow of personal data guarantees the confidentiality, integrity and availability of our users, clients and partners.

## 6. How long will we keep your data?

We will keep the data as long as necessary to fulfill the purpose for which they were collected, to ensure the provision of the service and comply with our legal obligations, or until you withdraw your consent.

- For queries or communications sent through the means of contact established for this purpose, we will process the information while they are active.
- We will keep your CV in case you consider it appropriate and authorize us to do so by the means by which MIRAI contacts you for a period of 2 years.
- In the case of sending our newsletter or publishing your comments on our blog, as long as you do not withdraw your consent.
- As for the duration of the installation of cookies, you can find all the information related to it in our Cookies Policy.
- Once deleted by appropriate security measures, we will keep them properly blocked for the time necessary to respond to future claims and defend our interests.

#### 7. How do we keep your data?

In compliance with our obligation of secrecy regarding the personal data collected, as well as our duty to safeguard them, we undertake to adopt the necessary security measures to prevent their modification, alteration, loss, unauthorized access or processing, in accordance with the provisions of the GDPR.

In MIRAI we recognize and take very seriously our responsibility to protect your personal data. That is why we maintain security levels of personal data protection in accordance with the GDPR and we have established all the technical means at our disposal to prevent the loss, misuse, alteration, unauthorized access and theft of the data you have provided, without prejudice to inform you that Internet security measures are not 100% invulnerable.



# 8. How can you manage the processing of your data?

You can exercise your rights of access, rectification, erasure and objection, as well as those of restriction of the processing and portability, at any of the addresses we have given you at the beginning or at the email address gdpr@mirai-advisory.com indicating what action on our part you are requesting.

The exercise of all these rights is free of charge and, for the sake of transparency, we provide more information about these rights:

Right	Purpose
Access	You can request information about what data we process about you, either by referring to the totality of the information or to specific data
Rectification	One of the principles of the applicable regulations is the accuracy of the data, so you can request its rectification at any time, in order to keep them properly updated.
Erasure	You can request the deletion of personal data, which will also be deleted if they are no longer necessary for the purpose for which they were collected or when you exercise your right to object to them. Except if they are necessary for compliance with a legal obligation, public interest, or for the exercise or defense of possible claims.  The consequence of the deletion of the data will be the impossibility of the correct provision of services by MIRAI. In the case of sending CVs, the deletion of the data will mean that you cannot be taken into account for selection processes.
Objection	In certain circumstances and for reasons related to your particular situation, you may object to the processing of your data. MIRAI will stop processing the data, except for compelling legitimate reasons, for the exercise or defense of possible claims, or to comply with our legal obligations.
Restriction of the processing	In certain circumstances you may request to restrict the processing of your data, in which case we will only retain it to comply with our legal obligations.



Right	Purpose
Portability	You can receive, in the most appropriate format in each case, the personal data you have provided to us.
Consent withdrawal	You may withdraw your consent at any time without affecting the lawfulness of the processing. If you request cancellation of your data, we will stop processing your data, but please note that we will no longer be able to provide you with services and that, in certain cases where we have the relevant legal basis, we will continue to process your information after you have withdrawn your consent and requested deletion of your information.

We also inform you that you have the right to file a complaint with the Spanish Data Protection Agency www.aepd.es. In any case, due to our strong commitment to privacy, we invite you to contact us directly to solve any question related to your personal data; we will be pleased to be of service to you.

#### 9. Modification of this personal data policy

MIRAI reserves its right to modify this policy to adapt it to future legislative developments, as well as to industry practices, by previously informing users through our website. We recommend that you consult this page from time to time to review the most recent version. At the bottom of this document, we indicate the date of the last update. The new privacy notice will be effective from the time of its publication.

In no event will such changes affect any choices you have made about how MIRAI may process your personal information. If at any time we wish to use your data in a manner different from that established at the time of collection, we will notify you by e-mail, requesting your consent.

Likewise, MIRAI reserves the right to terminate the services it provides to those users who do not comply with the legal terms and conditions of use, as well as with current legislation.

Last updated on September 2023.

