

PRIVACY POLICY

At **SHACKLETON, S.A.** we are committed to protecting and respecting your privacy, and therefore all our personal data processing operations strictly comply with the requirements set forth in 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 (**General Data Protection Regulation** or **GDPR**) and in Organic Law 3/2018, of 5 December, on the Protection of Personal Data and the Guarantee of Digital Rights (**LOPDGDD** or **LOPD**, for its initials in Spanish).

1. WHO IS THE DATA CONTROLLER OF YOUR DATA?

- 1.1. Corporate name: **SHACKLETON S.A.** (hereinafter, "**SHACKLETON**").
- 1.2. Tax ID No. (CIF): A-83861633.
- 1.3. Postal address: Calle de Arturo Soria 245, C.P. 28033, Madrid, Spain.
- 1.4. Contact by email: info@shackletongroup.com or by post to the above address.

2. FOR WHAT PURPOSE DO WE PROCESS YOUR DATA?

We want to provide you with as much clarity and information as possible regarding the data processing operations we carry out and their intended purpose:

- 2.1. Maintain professional relationships as an advertising and digital marketing agency, in order to provide services such as: development of advertising campaigns for brands, including the possibility of contracting our services through our website www.shackletongroup.com, communication plans, digital marketing, audio-visual work, creative pieces and claims, promotion and events, and corporate identity design, among other services.
- 2.2. Managing your browsing experience through our Website. We process your personal data in order to be able to answer all your queries and provide a user service for the processing of any complaint or question you may have regarding the operation of our Website.
- 2.3. Assessment of your profile, professional skills and CV, submitted

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by you in response to a selection process of personnel or a position that we offer in one of the companies that are part of the

SHACKLETON GROUP.

2.4. Data that the website collects automatically while browsing, if you have previously given your consent in the terms specified in this Privacy Policy.

2.5. We collect information about how you use our Website through the use of cookie technology. For more information on how we use cookies, please see our Cookie Policy.

2.6. Lastly, if you have consented, sending commercial communications with information on new services, events, participations, collaborations or publications, among other content. We hereby inform you that the personal data processed by **SHACKLETON** will not be used for different or subsequent purposes. If necessary, we will inform you of any relevant changes in this regard and request your renewed consent.

3. HOW LONG WILL WE KEEP YOUR PERSONAL DATA?

We would like to inform you that, at **SHACKLETON**, we process and store your personal data as long as professional contact is maintained.

We are subject to various different storage and documentation obligations, so the period of retention of personal data may be subject to different variations, and may be stored for up to:

- 4 years: General Tax Law.
- 6 years: Article 30 Commercial Code (accounting records, invoices, etc.).
- 10 years: Article 25 Law of 10/2010, of 28 April, on the Prevention of Money Laundering and Terrorism Financing.

If you have accepted and consented to our sending you commercial communications, personalised advertisements, studies and surveys related to **SHACKLETON**, we will keep your data from the time you subscribe until you request to unsubscribe.

In the event that the data are no longer necessary for the fulfilment of contractual or legal obligations, they will be deleted periodically (approximately every 2 years), unless their further limited processing is necessary to fulfil the purposes and obligations cited above.

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4. WHAT IS THE LAWFULNESS OF THE PROCESSING OF YOUR PERSONAL DATA?

The lawful basis that allows us to process your personal data is consent and legitimate interest. The legitimate interest is to enable professional contact and subsequent execution of the agreement for the provision of professional services offered by **SHACKLETON** (advertising and digital marketing agency), if so agreed between the two parties, including the possibility of contracting these services directly through our Website.

The personal data collected through the authorised forms will be subject to automated processing and will be incorporated into the corresponding section in our internal register of processing activities carried out on personal data that are owned by and under the responsibility of **SHACKLETON**.

The lawful basis for sending commercial communications, personalised advertisements, studies and surveys by **SHACKLETON** is the additional express consent requested.

We hereby inform you that you may revoke your consent to the processing of your data, provided it is legally appropriate, by sending a notification to info@shackletongroup.com or to the postal address indicated above. Lastly, we inform you that you are responsible for ensuring that the information and data you provide us through the **SHACKLETON** Website are correct, and that you are responsible for keeping them up to date. Likewise, you will be responsible for all false or inaccurate information and data provided to us and for any damages that these may cause to **SHACKLETON** or to third parties.

5. TO WHAT RECIPIENTS DO WE COMMUNICATE YOUR DATA?

From the **SHACKLETON** team, we hereby inform you that your personal data will be communicated to the companies that form a part of the "**SHACKLETON GROUP**" for administrative/professional purposes and the provision of internal corporate services, including the processing of personal data of clients, employees and candidates participating in selection processes called by any company in the "**SHACKLETON GROUP**".

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The companies that form part of the “**SHACKLETON GROUP**” are:

CORPORATE NAME	TAX ID NO. (CIF)	LOCATION
SHACKLETON S.A. (PARENT COMPANY)	A-83861633	C/ ARTURO SORIA, 245 28033, MADRID.
SHACKLETON MADRID S.L.	B-85568087	C/ ARTURO SORIA, 245 28033, MADRID.
SHACKLETON BUZZ&PRESS S.L.	B-85567840	C/ ARTURO SORIA, 245 28033, MADRID.
SHACKLETON BARCELONA S.L.	B-85703130	C/ ARTURO SORIA, 245 28033, MADRID.
OPPORTUNITY SHCK S.A.	A-84460468	C/ ARTURO SORIA, 245 28033, MADRID.
GLOBAL PUBLIC FIRM, S.L.	B-88162458	C/ ARTURO SORIA, 245 28033, MADRID.
SHACKLETON CHILE S.A.	BAT: 763658139	CERRO EL PLOMO 5680, OFICINA 600 E4, LAS CONDES, SANTIAGO DE CHILE, CHILE

With regard to the latter recipient (Shackleton Chile, S.A.), you explicitly consent to the transfer of your personal data to this company, being aware of the risks involved in its being located in Chile, outside the European Economic Area (EEA), which may mean that the same level of protection does not exist, as there are no adequacy decisions or guarantees. We wish to inform you that your data will not be transferred to other third parties, unless there is a legal obligation to do so (e.g. police or public prosecutor).

However, we hereby inform you that processing operations on your personal data may be carried out by third parties. The lawful basis for the provision of these services is the corresponding agreements for the processing of personal data that have been signed, in accordance with the requirements set forth in applicable personal data protection regulations currently in force. All SHACKLETON service providers are carefully selected, and the services undertaken shall be described in writing in an agreement. Thus, service providers will follow the instructions that we provide them, guaranteeing that they comply with the technical and organisational measures required by the applicable regulations, and in particular by the General Data Protection Regulations (GDPR), in all processing operations performed on the personal data they have access to that are under the responsibility of **SHACKLETON**.

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6. WHAT ARE YOUR RIGHTS?

SHACKLETON would like to inform you that you have the right to obtain confirmation from us regarding the possible processing of your personal data. If we are not processing your data, we will inform you of this accordingly.

How to exercise your rights. We would like to inform you that, should you wish to exercise your rights, you may send a written communication to the registered office of **SHACKLETON** or to the following e-mail address info@shackletongroup.com. Whichever medium you choose, you must include a photocopy of your ID card (DNI) or any other similar valid identification document (passport, resident card, etc.).

With regard to your personal data, you may request to exercise the following rights:

- 1.** The right to request the rectification of data (if you believe they are incorrect or inaccurate) or to request their deletion, when, among other reasons, you consider that the data are no longer necessary for the purposes for which we collected them.
- 2.** The right to request a restriction of the processing of your personal data. In this case, **SHACKLETON** will only keep your data for the exercise or defence of possible claims.
- 3.** The right to object to processing, in which case **SHACKLETON** will stop processing the data in the manner you indicate, unless we have to continue processing your data for lawful reasons or for the exercise or defence of possible claims.
- 4.** The right to data portability. If you request that your personal data be processed by another entity, **SHACKLETON**, whenever technologically possible, will facilitate the portability of your personal data to the new data controller indicated to us.

We also inform you that you can obtain the relevant forms and more information on the rights listed above on the website of the Spanish Data Protection Agency (AEPD, for its initials in Spanish).

If you consider that there is any problem with the way **SHACKLETON** is processing your data, you may send your complaint via email to info@shackletongroup.com, or directly to the corresponding data protection authority, which in Spain is the Spanish Data Protection Agency.

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7. SOCIAL NETWORKS

SHACKLETON has a profile on some of the main social networks on the Internet (YouTube, Facebook, Twitter, Instagram, etc.), and we are responsible for the data published on our profiles.

The data processing that **SHACKLETON** carries out on each of the aforementioned social networks shall be, at most, that which the social network allows for corporate profiles, in accordance with its terms and conditions of use. Thus, when the law does not prohibit it, **SHACKLETON** may inform its followers by any means that the social network allows, about its activities, new features of the digital platform and events related to **SHACKLETON**, as well as provide a personalised customer service in the event that you request it.

We would like to emphasise that in no case will **SHACKLETON** extract data from social networks, unless your consent to do so is obtained specifically and expressly. You will always be informed of our intended purposes for such data, and you will always be redirected to this Privacy Policy.

8. SECURITY MEASURES IN THE PROCESSING OF YOUR PERSONAL DATA

We take appropriate technical and organisational measures to ensure the security of your data and, in particular, to protect your personal data and to prevent third parties from acquiring knowledge of it, or from it being mistakenly or intentionally modified, lost or destroyed.

We periodically review these measures and adapt them to the current state of technology when necessary.

9. UPDATES TO THIS PRIVACY POLICY

We may update this Privacy Policy from time to time in response to legal, technical or business developments. When we update our Privacy Policy, we will take appropriate steps to inform you, in accordance with the relevance of the changes made.

You can see when this Privacy Policy was last updated by checking the “last updated” date indicated at the top of this Privacy Policy.

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