

PRIVACY POLICY

This policy sets out how your personal data and the information you provide to Aleksandra Czajka (hereinafter, "ACX LEGAL PARTNERS") are processed, in order to protect your privacy in accordance with Regulation (EU) 2016/679, General Data Protection Regulation (hereinafter, GDPR), and Organic Law 3/2018, of December 5, on the Protection of Personal Data and guarantee of digital rights (hereinafter, LOPD-GDD).

1. ACCEPTANCE AND CONSENT

By accepting this Privacy Policy, you give your express, informed, free, and unequivocal consent for the data you provide, to which the security, technical, and organizational measures provided in current regulations apply, to be processed by ACX LEGAL PARTNERS as the data controller.

Furthermore, by providing your data through electronic channels, you guarantee that you are over 14 years old and that the data provided are true, accurate, complete, and up to date. For these purposes, you confirm that you are responsible for the truthfulness of the data communicated and that you will keep this information duly updated so that it corresponds to your real situation, making yourself responsible for any false or inaccurate data you may provide, as well as for any direct or indirect damages that may arise.

2. WHO IS RESPONSIBLE FOR PROCESSING YOUR DATA?

- Holder: Aleksandra Czajka
- Trade Name: ACX LEGAL PARTNERS
- NIF: X9993858J
- Address: Calle Príncipe de Vergara, 60 - 28006 Madrid (Madrid) SPAIN
- Email: aleksandra.czajka@acxlegalpartners.com
- Website: www.acxlegalpartners.com

3. GENERAL PRINCIPLES APPLICABLE TO THE PROCESSING OF PERSONAL DATA

ACX LEGAL PARTNERS will process the personal data of clients and users in accordance with the principles established by the European Data Protection Regulation, which are explained below:

1. Principle of "lawfulness, fairness, and transparency": Data will be processed lawfully, fairly, and transparently in relation to the data subject.
2. Principle of "purpose limitation": Data will be collected for specified, explicit, and legitimate purposes, as indicated in section 6 of this Policy.

3. Principle of "data minimization": ACX LEGAL PARTNERS will only process data that are adequate, relevant, and limited to what is necessary for each specific purpose of processing, limiting the retention period and accessibility as necessary.
4. Principle of "accuracy": ACX LEGAL PARTNERS commits to taking reasonable measures to ensure that data are accurate and up-to-date, and to delete or rectify them without delay when they are inaccurate concerning the purposes for which they are processed.
5. Principle of "storage limitation": Data will be kept for no longer than it is necessary to fulfill the purposes of each data processing. These periods are indicated in section 8 of this Policy. Once these purposes have been achieved, the data will be deleted, blocked, or, failing that, anonymized (i.e., stripped of any element that allows the identification of data subjects).
6. Principle of "integrity and confidentiality": This implies that ACX LEGAL PARTNERS establishes the necessary technical and organizational measures to guarantee the integrity, availability, and confidentiality of the personal data it processes.
7. Principle of "accountability": This obliges ACX LEGAL PARTNERS, as the data controller, to maintain due diligence to protect and guarantee the rights and freedoms of natural persons whose data is processed.

4. WHAT PERSONAL DATA ARE COLLECTED ON THIS WEBSITE?

In accordance with the GDPR and the principles detailed above, only data that are adequate, relevant, and limited to what is necessary concerning the purposes for which they are provided will be processed, which in turn must be specified, explicit, and legitimate (information about these purposes is provided later).

ACX LEGAL PARTNERS collects and processes the personal data detailed below, the collection of which will depend on the different services you request on this Website:

- Identification data: name and surname and DNI (National Identity Document).
- Contact data: email address, postal address, and telephone number.
- Browsing data: IP address, device type and identification, browser type, domain through which you access the Website, browsing data, activity on the Website. To know clearly and precisely the cookies we use, you can consult the Cookie Policy.

5. HOW ARE THESE PERSONAL DATA COLLECTED? CAPTURE SYSTEMS

ACX LEGAL PARTNERS collects your personal information through the website contact form, but you will always be informed at the time of collection, through informative clauses, about the data controller, the purpose and legal basis of the processing, the recipients of the data, and the retention period of your information, as well as how you can exercise the rights that assist you in data protection matters.

In addition, ACX LEGAL PARTNERS uses social networks to offer content and interact with you. The information collected through the messages and communications you post may contain personal information that is available online and accessible to the public. These social networks have their own privacy policies where they explain how they use and share your information, so it is recommended that you consult them before using them to confirm that you agree with the way your information is collected, treated, and shared.

Through this website, ACX LEGAL PARTNERS collects personal information related to your browsing through the use of cookies. To know clearly and precisely the cookies used, their purposes, and how you can configure or disable them, consult the Cookie Policy.

6. FOR WHAT PURPOSES ARE YOUR DATA PROCESSED?

ACX LEGAL PARTNERS makes different forms available to you, and the information collected in each of them is used as follows:

- Contact Form: for inquiries, suggestions. In this case, your name, email address, and telephone number will be used to respond to inquiries and send the information that the user requests through the website.

7. WHAT IS THE LEGAL BASIS FOR PROCESSING THESE DATA?

ACX LEGAL PARTNERS processes your personal data with the following legal bases:

- The application of pre-contractual measures, to attend to your information request or send commercial information related to services similar to those that were the subject of contracting.
- The user's consent in relation to the sending of commercial communications, if applicable; whether via WhatsApp, email, or cookies.
- The legitimate interest of the data controller to provide the customer service you request and to protect users of the website www.acxlegalpartners.com from abuse and fraud in the use of my products and/or services.

8. HOW LONG ARE THE DATA RETAINED?

ACX LEGAL PARTNERS will only keep your information for the period necessary to fulfill the purpose for which it was collected, comply with legal obligations imposed, and attend to possible liabilities that may arise from fulfilling the purpose for which the data were collected.

Specifically, the following periods are established depending on the type of data in question:

- Data of potential non-subscriber clients: the data will be retained, in any case, during the validity of the established commercial relationship and, once concluded, for two more years, being deleted after that period or at the moment you request it.

9. WHAT ARE YOUR RIGHTS REGARDING THE USE OF YOUR DATA? HOW CAN YOU EXERCISE THEM?

The law grants you a series of rights as the owner of the personal data processed by ACX LEGAL PARTNERS, which are the following:

- Right of access to your personal data.
- Right to request rectification of inaccurate data.
- Right to request deletion when, among other reasons, the data are no longer necessary for the purposes for which they were collected.
- Right to request the limitation of processing of your data, in which case ACX LEGAL PARTNERS will only keep them for the exercise or defense of claims.
- Right to object to the processing of your data.
- Right to request the portability of your personal data to another data controller when technically possible.
- Right not to be subject to automated individual decisions.

You also have the option to unsubscribe from any of the subscription services provided by ACX LEGAL PARTNERS.

These rights are characterized by the following:

- Their exercise is free of charge, except in the case of manifestly unfounded or excessive requests (e.g. repetitive nature), in which case ACX LEGAL PARTNERS could charge a fee proportional to the administrative costs incurred or refuse to act.
- You can exercise the rights directly or through your legal or voluntary representative.
- ACX LEGAL PARTNERS must respond to your request within one month, although, considering the complexity and number of requests, the period may be extended by two more months.
- ACX LEGAL PARTNERS has the obligation to inform you about the means to exercise these rights, which must be accessible and cannot deny you the exercise of the right solely because you choose another means. If the request is submitted electronically, the information will be provided by these means when possible unless you request otherwise.
- If ACX LEGAL PARTNERS does not act on the request, it will inform you, no later than within one month, of the reasons for not acting and the possibility of filing a complaint with a Supervisory Authority.

To facilitate their exercise, below is the link to the website of the Spanish Data Protection Agency where you can find additional information, as well as links to the application form for each of the rights: <https://www.aepd.es/es/derechos-y-deberes/conoce-tus-derechos>

Likewise, the consent given, both for the processing and for the transfer of the data of the interested parties, is revocable at any time, communicating it to ACX LEGAL PARTNERS under the terms established in this section. This revocation will not have retroactive effects in any case.

To exercise your rights, ACX LEGAL PARTNERS offers you the following means of communication:

1. By written and signed request addressed to ACX LEGAL PARTNERS Aleksandra Czajka, Calle Príncipe de Vergara, 60 - 28006 Madrid (Madrid). Email: aleksandra.czajka@acxlegalpartners.com, indicating as Ref. "Exercise of LOPD Rights".
2. Sending a scanned and signed form to the email address aleksandra.czajka@acxlegalpartners.com, indicating in the subject "Exercise of LOPD Rights".

In both cases, you must prove your identity by attaching a copy of your DNI or equivalent document, to verify that the response is only given to the interested party. If you submit your request through a legal representative, you must also provide a document accrediting the representation.

Also, and especially if you consider that you have not obtained full satisfaction in the exercise of your rights, you may file a complaint with the national Supervisory Authority, addressing for these purposes the Spanish Data Protection Agency, C/ Jorge Juan, 6 – 28001 Madrid.

10. TO WHICH RECIPIENTS WILL YOUR DATA BE COMMUNICATED?

In general, ACX LEGAL PARTNERS does not share your personal information, except for those transfers that must be made based on imposed legal obligations. In the case of being transferred to any third party, you would be informed in advance and your consent requested.

Although it is not a transfer of data itself, to provide you with the requested service, it may be that third-party companies, acting as suppliers of ACX LEGAL PARTNERS, access your information to carry out the service that ACX LEGAL PARTNERS has contracted (for example, web development and maintenance company, hosting company, payment processing services, order processing, analytics, marketing campaign management, website management, and email distribution and other similar service providers). These processors access your data following the instructions of the controller and without being able to use them for a different purpose, maintaining the strictest confidentiality.

Also, your personal information will be available to Public Administrations, Judges, and Courts, for the attention of possible liabilities arising from the processing.

In compliance with the principles of information and transparency, we inform you of the third parties that may access your data as data processors:

- Wix: web platform in charge of the company Wix.com Inc., based in New York, NY, USA, which is adhered to the adequacy decision for EU-US data flow "Data Privacy Framework" adopted by the European Commission on 07/10/2023. Here you have access to their privacy policy: <https://es.wix.com/about/privacy>
- Ionos: provides web hosting, email server, and domain management, through the company IONOS Cloud S.L.U., located at Avenida de la Vega, 1 Edificio Veganova 3 Planta 5 Puerta C Alcobendas 28108 Madrid, Spain. You can consult their privacy policy here: <https://www.ionos.es/terms-gtc/politica-de-privacidad/>

- Microsoft Office 365 Teams: provides office services, storage, and cloud organization, as well as videoconferencing. The company MICROSOFT CORPORATION is located in Redmond, Washington, United States, and is adhered to the adequacy decision for EU-US data flow "Data Privacy Framework" adopted by the European Commission on 07/10/2023. You can consult their privacy policy here: <https://privacy.microsoft.com/es-es/privacystatement>

11. SEGMENTATION AND PROFILING

The registration of personal data provided at the time of interaction with the web and any other data provided during navigation, including the information supplied by cookies in relation to browsing habits, will be used in order to be segmented or categorized with the purpose of applying them to activities related to general administration management, information, analysis of proposals requested by users/clients, statistical study of services and content used, tastes and preferences, and surveys or forms.

Profiling, through the analysis of your automated individual decisions, consists of using your Personal Data to evaluate certain personal aspects, such as the analysis and prediction of your economic situation, personal preferences, interests, behavior, location, movements, and attitudes. The logic applied to obtain these profiles is the use of statistical procedures. The consequence of this processing of your data by profiling is the sending of personalized communications of your interest.

The legal basis for the processing of your data for the indicated purposes and the making of automated individual decisions by profiling is the consent granted by checking the box "I accept to receive personalized commercial communications" in the subscription forms, or by expressly accepting advertising cookies.

The data used in profiling and shown to advertisers are not data that allow users to be identified; only the type of audience, their age, country, gender, etc., will be displayed in a graph.

12. INTERNATIONAL DATA TRANSFERS

We have contracted services from providers located outside the European Economic Area ("Third Countries"). Through this policy, ACX LEGAL PARTNERS declares that it proceeds to make (in such cases) the pertinent international transfers to be able to carry out the service/functionality you have requested, always safeguarding the security of your data and ensuring that they comply with the data protection requirements contained in the GDPR.

These providers have signed the corresponding confidentiality and data processing contracts required by the regulations for providers located in Third Countries, applying the necessary guarantees and safeguards to preserve your privacy. These guarantees and safeguards consist of adequacy decisions of the European Commission, standard contractual clauses (SCC) approved by the European Commission, or other legal mechanisms permitted by the GDPR.

13. HOW IS YOUR INFORMATION PROTECTED?

ACX LEGAL PARTNERS is committed to protecting your personal information; for which it uses reasonably reliable and effective physical, organizational, and technological measures, controls, and procedures aimed at preserving the integrity and security of your data and guaranteeing your privacy.

In the case of contracts that ACX LEGAL PARTNERS signs with suppliers, clauses are included in which they are required to maintain the duty of secrecy regarding the personal data to which they have had access by virtue of the commissioned task, as well as to implement the necessary technical and organizational security measures to guarantee the confidentiality, integrity, availability, and permanent resilience of the systems and services processing personal data.

This website includes an SSL certificate. This is a security protocol that makes your data travel in an integral and secure manner; that is, the transmission of data between a server and the web user, and in feedback, is fully encrypted.

However, absolute security cannot be guaranteed, and no security system is impenetrable, so, in the event that any information subject to processing and under the control of ACX LEGAL PARTNERS is compromised as a result of a security breach, the data controller will take appropriate measures to investigate the incident, notify it to the Control Authority and, where appropriate, to those users who could have been affected so that they take appropriate measures.

14. CHANGES IN THE PRIVACY POLICY

ACX LEGAL PARTNERS reserves the right to modify this policy to adapt it to legislative or jurisprudential developments, as well as to industry practices. In such cases, you will be informed through the website or through other means, so that you can be aware of the new privacy conditions introduced.

This Privacy Policy has been last updated on 11/21/2024.