

PRIVACY POLICY

The protection of your personal data and your privacy is important to us. We process your data for limited purposes only and in a confidential manner and only based on and in accordance with the applicable laws, in particular in accordance with the General Data Protection Regulation (GDPR).

In this Data Privacy Policy, we would like to inform you about the nature, scope and purposes of the collection and use of your personal data and inform you about the legal basis of the processing, deletion periods, and about your respective rights.

Where we operate in jurisdictions outside of the European Union or where GDPR does not apply (such as in the United States of America), these descriptions and in particular the outlined rights and obligations and limitations to processing do not necessarily apply and nothing in this Data Privacy Policy may be interpreted to establish rights or obligations that go beyond what is mandated by the respectively applicable data protection legislation.

We may change this Privacy Policy from time to time. In the event of modifications, we will notify you via the website or by other means, so that you can be aware of the new Privacy conditions. By continuing to use the functionalities made available by our company after we have notified you of such changes, you agree to such changes, except in cases where your express consent is required.

In compliance with the provisions of the GDPR, the Portal User is informed of the following:

DATA CONTROLLER

- The personal data provided by the User through the completion of any form on the website or that may be provided in the future will be collected and processed automatically by Phoenix Tower International Investments LLC (hereinafter, PTI), located at 999 Yamato Road, Suite 100, Boca Raton, FL 33431, United States.
- To guarantee the proper management of the processing of your data, PTI has designated a Privacy Office, to whom you can address any questions you may have and whom you can contact at the following e-mail address privacy@phoenixintl.com

WHAT DATA IS PROCESSED, FOR WHAT PURPOSE AND ON WHAT BASIS?

The personal data processed through this website or through other channels made available by PTI may be processed by PTI for the following purposes:

- 1. Statistical analysis of the use of the services**

- **Description of purpose:** analysis of browsing on the website to optimise and improve the User's experience. In any case, these are non-invasive analyses that allow for the improvement of the services and the technology applied to them.
- **Data processed for this purpose:** (1) identification data (navigation identifier), (2) personal and social characteristics (if applicable). The data are obtained from the User's own browsing of PTI.
- **Legal basis:** Article 6(1)(f) GDPR. PTI's legitimate interest in the continuous improvement of the business model offered on the website, as well as the correction of any deficiencies that may be detected in the delivery of the service.

2. Contact

- **Description of purpose:** To maintain contact between PTI and the User and to manage queries submitted by the User through the contact forms made available on the website.
- **Data processed for this purpose:** (1) Email address and, if you provide such information to us, (2) First name and (3) Last name. Also, the content of the communication (including personal data you may indicate) will be processed by us for the purpose of responding to your request.
- **Legal basis:** Article 6(1)(b) GDPR. Execution of the established contractual relationship.

3. Own commercial communication

- **Description of purpose:** If the User consents, we will send him/her commercial communications about our products and services that may be of interest to him/her by telephone or electronic means (e-mail, SMS and similar means).
- **Data processed for this purpose:** Identification data (name, surname, telephone number, email.). These data are provided directly by the User in the corresponding form.
- **Legal basis:** Article 6(1)(a) GDPR. The express consent of the User, which is given by ticking the box provided for this purpose on the forms.

4. Fulfilment of legal obligations

- **Description of purpose:** Fulfilment of those legal obligations that are applicable to PTI.

- **Data processed for this purpose:** Any categories of data processed in the context of the above purposes.
- **Legal basis:** Article 6(1)(c) GDPR. The legal obligations applicable to PTI that require the processing of personal data in accordance with the service provided.

5. When you apply for a job

- **Description of purpose:** Evaluate and manage your job application and, where appropriate, to carry out the necessary actions to manage your application and the different phases or tests that make up our selection process.
- **Data processed for this purpose:** we process the following information: (1) Email address and, if you provide such information to us, (2) First name and (3) Last name (4) Your CV.
- **Legal basis:** Article 6(1)(a) GDPR. The express consent of the User, which is given by ticking the box provided for this purpose on the forms.

At any time, the user has the right to object to the processing carried out based on legitimate interest, by contacting the address privacy@phoenixintl.com.

THIRD PARTIES' PERSONAL DATA

If the personal data provided belong to a third party, the User guarantees that he/she has informed him/her of the Privacy Policy and has obtained his/her consent to provide his/her data to PTI for the aforementioned purposes.

Likewise guarantees that the data provided are accurate and up to date, being responsible for any damage or loss, direct or indirect, that may be caused because of the non-fulfilment of this obligation.

TIME LIMITS FOR THE STORAGE OF PERSONAL DATA

Logfiles obtained *when you visit our website* are normally erased after 14 days. They may be stored for a longer period if necessary, including if this is required under European Union or national laws or for the exercise of our legal rights.

Personal data processed in the context of *our communications with you (i.e., via the "Contact" form online or via email)* are normally erased after a period of 5 years after processing the request. They may be stored for a longer period if necessary, including if this is required under European Union or national laws or for the exercise of our legal rights.

We reserve the right to retain the candidate's CV for future selection processes, for a maximum period of one year.

At the end of the foreseen storage period (depending on the purpose), the personal data may be kept, duly blocked, during the periods of prescription of the legal actions and responsibilities that may derive, in each case, from the specific processing activity carried out, after which they will be completely erased.

TRANSFERS AND RECIPIENTS OF PERSONAL DATA

All transfers of personal data that PTI will carry out are necessary for the fulfilment of the purposes indicated, or are carried out to comply with a legal obligation, with respect to the following Companies and Public Bodies:

- (i) If necessary, to PTI Group companies that can be consulted at privacy@phoenixintl.com, for administrative and customer relationship management purposes, based on the legitimate interest of PTI for this purpose. The legitimate interest of PTI for the aforementioned purpose of the communication would consist of ensuring a better organisation and optimisation, as well as a unified management of the resources of the business group in those cases in which, internally, it is necessary for the effective execution of the activity carried out.
- (ii) Public Administrations and the Administration of Justice.

As a global company, we may share your data within Phoenix Tower International. Appropriate safeguards for personal data transfers within Phoenix Tower International will be ensured through *Standard Contractual Clauses* approved by the European Commission to legitimise the international transfer of data to third parties.

Further information on international transfers can be obtained by contacting our Privacy Office at privacy@phoenixintl.com.

YOUR DATA PROTECTION RIGHTS

We remind you that as a User you may exercise to PTI, if applicable, the rights of access, rectification or suppression, limitation of processing, opposition, portability and to oppose automated individual decisions. The User may revoke his/her consent in the event that he/she has given it for a specific purpose and may modify his preferences at any time.

The User may exercise his/her rights at the following e-mail address: privacy@phoenixintl.com

The User is informed that he/she may address any complaints regarding the protection of personal data to the Supervisory Authority of his/her jurisdiction.

This website also stores cookies on your computer. These cookies are used to improve your website experience and provide more personalized services to you, both on this website and through other media. To find out more about the cookies we use, see our [Cookie Policy](#) (Insertar link a la Cookie Policy)

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