

## PRIVACY POLICY

### BASIC INFORMATION ON DATA PROTECTION

Controller	SEMIDYNAMICS TECHNOLOGY SERVICES, S.L. (B66824772) Muntaner 447 P.4 Pta.1 08021 Barcelona (Spain) Telephone: +34 934068704 <a href="mailto:dpo@semidynamics.com">dpo@semidynamics.com</a> <a href="http://www.semidynamics.com">www.semidynamics.com</a>
Purposes	<ul style="list-style-type: none"> <li>- Management of the contractual relationship with Data Subject</li> <li>- Commercial information</li> <li>- Management of job offers and applications</li> <li>- Organization and management of corporate events</li> <li>- Compliance with legal, accounting, tax and administrative obligations</li> </ul>
Legal Basis	<ul style="list-style-type: none"> <li>- Data Subject Consent</li> <li>- Legitimate interest</li> <li>- Compliance with legal obligations</li> </ul>
Recipients	<ul style="list-style-type: none"> <li>- Authorized SEMIDYNAMICS' employees or representatives acting on SEMIDYNAMICS' behalf, subject to current and applicable data protection regulations.</li> <li>- Any company of the SEMIDYNAMICS Group</li> <li>- Administrations, Authorities, and Public Institutions, including Courts and Tribunals, when required by applicable regulation.</li> <li>- Suppliers necessary for SEMIDYNAMICS' infrastructure or for its Products and/or Services. This list of suppliers will be updated on a regular basis.</li> <li>- In the case of corporate events: sponsors, media and/or social networks indicated in the data collection form</li> </ul>
Rights of Data Subjects	Access, rectification, erasure, restriction, opposition and/or portability, as detailed in the Additional Information
Additional Information	Additional and detailed information on Data Protection can be found on our website <a href="https://www.semidynamics.com/privacypolice/">https://www.semidynamics.com/privacypolice/</a>

### ADDITIONAL INFORMATION ON PRIVACY POLICY

#### CONTROLLER

**Data Controller:** The Controller of the Data identified in this Privacy Policy is:

SEMIDYNAMICS TECHNOLOGY SERVICES, S.L. (B66824772)  
Muntaner 447 P.4 Pta.1  
08021 Barcelona (Spain)  
Telephone: +34 934068704  
[dpo@semidynamics.com](mailto:dpo@semidynamics.com)  
[www.semidynamics.com](http://www.semidynamics.com)

This Privacy Policy applies to the personal information and data collected when you a) interact with our website for any purpose (request of information, apply for a job, report a complaint in the Whistleblowing Channel,...); b) sign a contract with SEMIDYNAMICS TECHNOLOGY SERVICES, S.L. or its affiliates (collectively referred to as SEMIDYNAMICS); c) register to any of SEMIDYNAMICS' corporate event; or, d) otherwise interacts with us.

**Data collection and processing:** Prior to the collection of personal data ("Data"), and in accordance with the principles of lawfulness, loyalty and transparency, the owners of the Data ("Data Subject") are informed of the

existence of this Privacy Policy so that they can give their explicit consent in a free, specific, informed and unequivocal manner as required by 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").

Personal Data will only be requested if strictly necessary for the fulfilment of the purposes ("Purposes") for which they are collected and will not be used for other purposes.

The Data shall be adequate, relevant and not excessive in relation to each of the Purposes and shall be updated whenever necessary. They will in all cases be processed in a fair, lawful and transparent manner.

**Acceptance:** By accepting this Privacy Policy, the Data Subject expressly accepts and consents to the collection, use and, where appropriate, transfer of their Data under the terms indicated below.

**Possibility of withdrawing consent:** The Data Subject has the right to withdraw consent at any time by contacting [dpo@semidynamics.com](mailto:dpo@semidynamics.com), without this affecting the lawfulness of the processing based on the consent prior to its withdrawal.

**Possibility of complaining to the supervisory authority, the Spanish Data Protection Agency (AGPD):** The Data Subject may address any claims arising from the processing of their Personal Data to the Spanish Data Protection Agency ([www.agpd.es](http://www.agpd.es)).

**Source of Data:** As a general rule, Personal Data are collected directly from the following sources:

- Data Subject: the Personal Data that we collect directly from the Data Subject includes the following:
  - If Data Subject a) expresses an interest in obtaining additional information about our products and/or services; b) uses our "Contact Us" or similar features in the website; c) signs a contract; d) signs up in our website or for an event; e) makes a complaint or reports an irregularity in the Whistleblowing Channel, we will require that Data Subject provides to us the contact information, such as name, job title, company name, address, phone number, email address or username and password;
  - If Data Subject attends an event where we scan Data Subject's attendee badge, we will collect Personal Data from the attendee badge or from the scanned QR such as name, title, company name, address, country, phone number and email address;
  - If Data Subject uses and interact with our websites or emails, we automatically collect information about Data Subject's device and usage of our websites or emails through cookies, web beacons or similar technologies;
  - If Data Subject visits our offices, Data Subject will be required to register as a visitor and to provide name, email address, phone number, company name and time and date of arrival.
  - If Data Subject uses and interact with our websites or emails, we automatically collect certain data during the Data Subject's visit such as IP, IP address assigned to Data Subject's computer by its Internet provider, date and time of the visit to the site as well as the pages consulted, computer's operating system and browser software, login in case Data Subject is browsing in section with limited access, or the duration of the connection. These Data is processed with Data Subject's content when required by law or on the basis of our legitimate interest to improve navigation of the site and for the purpose of statistical analysis. Please see our [Cookies Policy](#).
- Other sources: in certain exceptions, the Data may be collected through third parties, partners, entities or services other than the Data Subject. With regard to this point, it will be communicated to the Data Subject through the informed consent clauses within a reasonable period of time, once the Data have been obtained, and within 1 (one) month at the latest.

**Security** SEMIDYNAMICS is aware of the importance and confidentiality of Personal Data and therefore takes the security measures required by current legislation on data protection, including the General Data Protection Regulation (GDPR), in order to ensure that this information is processed, stored and maintained securely against loss of data and unauthorized access. In the event of a security incident that could pose a risk to the rights and freedoms of the Data Subject, SEMIDYNAMICS will notify the Data Subject immediately and, at the latest, within 72 (seventy-two) hours of becoming aware of the incident.

## **PURPOSES**

**Purposes of processing:** When we process usage and analytical information, as well as statistical and aggregate Data, we do so anonymously.

The specific Purposes for which SEMIDYNAMICS collects Personal Data are indicated in the informative clauses for each of the different means of Data collection (online forms, paper forms, informative notes, events badges and contracts).

Personal Data are collected for the following purposes:

- *Managing the contractual relationship with the Data Subject*
  - Performance of a contract with the Data Subject in its capacity as client, partner or employee, or taking pre-contractual steps at Data Subject's request. Failure to provide Personal Data may mean that SEMIDYNAMICS cannot enter into the contract.
  - Provide and operate the requested services and support, including the management, administration, documentation, invoicing, provision, monitoring, expansion and improvement of the content, information and services offered by any of the companies of the SEMIDYNAMICS Group.
  - Sending updates of Products and/or Services and any technical and operational information that may be required regarding the Products licensed and/or the requested Services and/or regarding activities related to those Products and/or Services.
  - Analysis for statistical purposes in connection with our Products and/or Services in order to evaluate and improve them and our business operations, develop new Products and/or Services and features, and for internal quality control.
- *Commercial information*
  - Sending commercial information about news and activities related to the contracted Products and/or the Services
  - Sending information, by any means, about new products or services, promotions, newsletters and other marketing contents, news and events or requests for demonstrations
  - Managing and improving our advertising campaigns in order to better reach people with relevant content
- *Management of job offers and applications*
  - Management and processing of vacancies and job applications
  - Carrying out selection processes for positions available in any of the companies of the SEMIDYNAMICS Group.
  - Other purposes related to dealing with offers posted and applications received
- *Organization and management of corporate events*
  - Planning, organization and management of events and functions for which the Data Subject registers
  - Publication in the media, on our website and/or on Social Media, of photographs and images of Data Subjects taken at events
  - Other purposes related to the management and organization of corporate events and functions
- *Compliance with legal, accounting, tax, and administrative obligations*
  - Compliance with legal, accounting, tax and administrative obligations to which SEMIDYNAMICS is subject

**Data categories and retention periods:** SEMIDYNAMICS will only collect the Data necessary to achieve the purposes for which they are collected and will keep them for as long as they are necessary to fulfil these Purposes or as long as the Data Subject does not indicate otherwise exercising the rights of deletion, cancellation and/or restriction of the processing of their Data. The Data will be subsequently cancelled, without any use being made of them, remaining blocked and at the disposal of the Public Authorities, Judges and Courts to cover any possible liabilities arising from the processing of the Data until legal obligations based on current regulations are met regarding retention. Once this period has expired, the Data shall be destroyed.

Notwithstanding the above, SEMIDYNAMICS may keep anonymized information and Data relating to our Products and/or Services, with the aim of improving their quality.

Purpose	Category of data processed
Management of the contractual relationship with Data Subject	<ul style="list-style-type: none"> <li>- Client/Partner: Professional contact details and billing information (name of contact person, company name, address, e-mail, telephone, professional or academic title...)</li> <li>- Navigation data: Name of the internet service provider, details of the website from which Data Subject visit us, web browser and operating system used, IP address assigned by Data Subject's internet service provider, files requested, volume of data transmitted, downloads and file exports, details of the websites accessed from our site, including date and time. For technical security reasons (in particular, to intercept any attempts to hack our web server), this data is stored in accordance with Art. 6(1) (f) EU GDPR. Anonymization in the form of truncation of the IP address takes place within no more than seven days, hence no link is created to the user.</li> </ul>
Commercial information	<ul style="list-style-type: none"> <li>- Client's or Partner's professional contact details (identification, postal and/or e-mail addresses, Email and/or phone number, professional or academic title.)</li> <li>- Navigation data: Name of the internet service provider, details of the website from which Data Subject visit us, web browser and operating system used, IP address assigned by Data Subject's internet service provider, files requested, volume of data transmitted, downloads and file exports, details of the websites accessed from our site, including date and time. For technical security reasons (in particular, to intercept any attempts to hack our web server), this data is stored in accordance with Art. 6(1) (f) EU GDPR. Anonymization in the form of truncation of the IP address takes place within no more than seven days, hence no link is created to the user.</li> </ul>
Management of job offers and applications	<ul style="list-style-type: none"> <li>- Candidates' or Employees' contact details (identification, postal and/or e-mail addresses, academic and employment history) SEMIDYNAMICS TECHNOLOGY SERVICES, S.L. will never ask you to provide information that is not necessary for a selection process. In particular, we will never collect information about your racial or ethnic origin, political opinions, religious beliefs, trade union membership or sex orientation.</li> <li>- Other data necessary to comply with legal obligations</li> </ul>
Organization and management of corporate events	<ul style="list-style-type: none"> <li>- Registered participants' Data (identification, postal and/or e-mail addresses, telephone number, professional or academic title, photographs and/or images taken during their participation in the event)</li> </ul>
Compliance with legal, accounting, tax and administrative obligations	<ul style="list-style-type: none"> <li>- Legal, accounting and tax data</li> </ul>

### LEGAL BASIS

**Legitimation for the processing of the Data:** As a general rule, before processing personal data, SEMIDYNAMICS obtains the explicit and unequivocal consent of the owner of the Data. The Data Subject is responsible for the legality and veracity of the Data provided.

Purpose	Legal Basis
Management of the contractual relationship with Data Subject	Performance of a contract Legitimate interests

Commercial information	Data Subject Consent
Management of job offers and applications	Data Subject Consent
Organization and management of corporate events	Data Subject Consent
Compliance with legal, accounting, tax and administrative obligations	Compliance with legal obligations Legitimate interests

## RECIPIENTS

**Transfer of data to third parties and international data transfers:** To the extent necessary for the Purposes described above, the Data provided by the Data Subject may be transferred to the entities listed below, and with which SEMIDYNAMICS has signed the corresponding data processing agreements in order to ensure the security of Data in accordance with the requirements and standards demanded by European regulations on the protection of Personal Data.

In the case of processors located outside the EEA, standard data protection clauses adopted by the European Commission (Commission Implementing Decision (EU) 2021/915) have been used and, when Data is transferred to the US, SEMIDYNAMICS ensures that the processor company participates in the EU-U.S. Data Privacy Framework ("DPF").

By accepting this Privacy Policy, the Data Subject consents that the Data may be transferred to:

- Authorized SEMIDYNAMICS' employees or representatives acting on SEMIDYNAMICS' behalf, subject to current and applicable data protection regulations.
- Any company of the SEMIDYNAMICS Group
- Administrations, Authorities, and Public Institutions, including Courts and Tribunals, when required by applicable regulation.
- Suppliers necessary for SEMIDYNAMICS' infrastructure or for its Products and/or Services [Subprocessors List]. This list of suppliers will be updated on a regular basis.
- In the case of corporate events: sponsors, media and/or social networks indicated in the data collection form

LEGAL ENTITY NAME AND REGISTERED ADDRESS	NATURE AND PURPOSE OF PROCESSING	DATA LOCATION	ADDITIONAL INFORMATION (PRIVACY POLICY)	ADEQUACY
IONOS Group SE Elgendorfer Straße 57 56410 Montabaur Germany	Data hosting	EU	<a href="https://www.ionos-group.com/privacy-policy.html">https://www.ionos-group.com/privacy-policy.html</a>	DPA
AMAZON WEB SERVICES EMEA SARL 38, Avenue John F. Kennedy L-1855 Luxemburg	Data hosting	EU/USA	<a href="https://aws.amazon.com/privacy/">https://aws.amazon.com/privacy/</a>	DPA  Certified Data Privacy Framework DPF participant according to the adequacy decision for the EU-U.S. Data Privacy Framework
GOOGLE IRELAND LIMITED Gordon House, Barrow Street Dublin 4 - Ireland	Cloud Service Provider IT Services Prevention of data processing abuse attempts (Google reCAPTCHA)	EU/USA	<a href="https://policies.google.com/privacy?hl=en-US">https://policies.google.com/privacy?hl=en-US</a>	DPA  Certified Data Privacy Framework DPF participant according to the adequacy decision for the EU-U.S. Data Privacy Framework

MICROSOFT IRELAND OPERATIONS Ltd. One Microsoft Place South County Business Park Leopardstown Dublin 18 - Ireland	Cloud Infrastructure (IaaS), Storage	EU/USA	<a href="https://privacy.microsoft.com/en-gb/privacystatement">https://privacy.microsoft.com/en-gb/privacystatement</a>	DPA  Certified Data Privacy Framework DPF participant according to the adequacy decision for the EU-U.S. Data Privacy Framework
LINKEDIN IRELAND UNLIMITED Company Wilton Plaza Wilton Place Dublin 2 - Ireland	Brand promotion, advertising Recruiting	EU/USA	<a href="https://www.linkedin.com/legal/privacy-policy">https://www.linkedin.com/legal/privacy-policy</a>	DPA  Certified Data Privacy Framework DPF participant according to the adequacy decision for the EU-U.S. Data Privacy Framework
ADOBE SYSTEMS SOFTWARE IRELAND Limited 4-6 Riverwalk City West Business Campus Dublin 24 - Ireland	Adobe sign electronic signatures	EU/USA	<a href="https://www.adobe.com/privacy/policy.html">https://www.adobe.com/privacy/policy.html</a>	DPA  Certified Data Privacy Framework DPF participant according to the adequacy decision for the EU-U.S. Data Privacy Framework
ORACLE Corporation (NetSuite) 500 Oracle Parkway Redwood Shores, California USA	Billing and accounting	EU/USA	<a href="https://www.oracle.com/trust/">https://www.oracle.com/trust/</a> <a href="https://www.oracle.com/es/legal/privacy/">https://www.oracle.com/es/legal/privacy/</a>	DPA SCC
ZOOM VIDEO COMMUNICATIONS, INC. 55 Almaden Blvd, 6th Floor San Jose, CA United States of America	Virtual meetings and communications	EU/USA	<a href="https://explore.zoom.us/en/privacy/">https://explore.zoom.us/en/privacy/</a>	DPA  Certified Data Privacy Framework DPF participant (according to the adequacy decision for the EU-U.S. Data Privacy Framework)

**SEMIDYNAMICS profiles on social networks** SEMIDYNAMICS has a profile on LinkedIn and X (formerly, Twitter). When a Data Subject becomes a follower of our page in those social networks, the processing of Data will be governed by the corresponding conditions of use and privacy policies. SEMIDYNAMICS will process Personal Data for commercial purposes only.

## RIGHTS OF DATA SUBJECTS

**Rights of Data Subjects:** Data Subjects, as owners of their Personal Data, have the following rights:

1. Right to request access to their Personal Data.
2. Right to rectify erroneous or inaccurate Data.
3. Right to erasure of their Personal Data
4. Right to object to the processing of their Personal Data.
5. Right to request a restriction of their Personal Data processing
6. Right to portability of their Personal Data (if applicable).
7. The right to transparency in the information received.

8. The right not to be subject to automated individual decisions.
9. The right to withdraw consent given for the processing of their Personal Data.

The Data Subject may exercise their personal data protection rights at any time by sending a letter to SEMIDYNAMICS TECHNOLOGY SERVICES, S.L., Muntaner 447 P.4 Pta.1 - 08021 Barcelona (Spain), or via an email to [dpo@semidynamics.com](mailto:dpo@semidynamics.com). An identification document (ID card, passport or equivalent) may be required in order to prove the applicant's identity.

Models, forms and more information about your rights are also available on the website of the Spanish Data Protection Agency: [www.agpd.es](http://www.agpd.es).

#### **CHANGES TO THIS PRIVACY POLICY**

SEMIDYNAMICS reserves the right to modify this Privacy Policy at any time and, when required by law, we will notify you of any changes to this Privacy Policy. In the event that we make a material change, we will notify you before the change becomes effective.