

Privacy Policy

The Data Controller hereby informs you of its Privacy Policy regarding the processing and protection of personal data belonging to users and customers that may be collected while browsing, purchasing a product, or contracting a service through the Website: <https://instituto nutrigenomica.com>

In this regard, the Data Controller guarantees compliance with current regulations on the protection of personal data, as set forth in Organic Law 3/2018 of December 5 on the Protection of Personal Data and the Guarantee of Digital Rights (LOPD GDD). It also complies with Regulation (EU) 2016/679 of the European Parliament and of the Council of April 27, 2016, on the protection of natural persons (GDPR).

Use of the Website implies acceptance of this Privacy Policy as well as the terms included in the Legal Notice.

Identity of the Data Controller

- Data Controller: Instituto Nutrigenómica, s.l.
- Tax ID: ESB-98621444

Registered in the Madrid Commercial Registry, volume 32,285, book , section 8, page 168, sheet M-581086, entry 3.

- Address: Plaza Santa Bárbara, 6, 2nd floor left, Madrid - Spain.
- Email: info@nutriprivilege.com
- Website: global.nutriprivilege.com

Principles Applied to Data Processing

When processing your personal data, the Data Controller will apply the following principles, which comply with the requirements of the new European General Data Protection Regulation (GDPR):

- Principle of lawfulness, fairness, and transparency: The Data Controller will always require consent for the processing of personal data, which may be for one or more specific purposes about which the Data Controller will inform the User in advance with complete transparency.
- Principle of data minimization: The Data Controller will request only the data strictly necessary for the purpose or purposes for which it is requested.

- Principle of storage limitation: The Data Controller will retain the collected personal data for the time strictly necessary for the purpose or purposes of the processing. The Data Controller will inform the User of the corresponding retention period according to the purpose.

In the case of subscriptions, the Data Controller will periodically review the lists and delete those records that have been inactive for a considerable period of time.

- Principle of integrity and confidentiality: The personal data collected will be processed in such a way that its security, confidentiality, and integrity are guaranteed.

The Data Controller takes the necessary precautions to prevent unauthorized access or misuse of its users' data by third parties.

Collection of Personal Data

You are not required to provide any personal data to browse the website.

You may provide your personal data in the following cases:

- When contacting us via the contact forms or sending an email.
- When leaving a comment on an article or page.
- When purchasing a product or contracting a service.
- When signing up for a subscription form or newsletter managed by the Data Controller via Active Campaign.

Rights

The Data Controller informs you that regarding your personal data, you have the right to:

- Request access to the stored data.
- Request rectification or erasure.
- Request restriction of processing.
- Object to processing.

You cannot exercise the right to data portability.

The exercise of these rights is personal and must therefore be exercised directly by the data subject by submitting a request directly to the Data Controller. This means that any customer, subscriber, or collaborator who has provided their data at any time may contact the Data Controller to request information about the data

stored and how it was obtained, request the correction of such data, object to its processing, restrict its use, or request the deletion of that data from the Data Controller's files.

To exercise your rights, you must send your request along with a photocopy of your National Identity Card or equivalent to the email address: info@nutriprivilege.com

The exercise of these rights does not include any data that the Data Controller is required to retain for administrative, legal, or security purposes.

You have the right to effective judicial protection and to file a complaint with the supervisory authority, in this case, the Spanish Data Protection Agency, if you believe that the processing of personal data concerning you violates the Regulation.

Purpose of Personal Data Processing

When you access the Website to send an email to the Data Controller, post a comment on an article or page, subscribe to the newsletter, or purchase a product or service, you are providing personal information for which the Data Controller is responsible. This information may include personal data such as your IP address, first and last name, physical address, email address, phone number, and other information. By providing this information, you consent to your information being collected, used, managed, and stored by — Raiola Networks — solely as described on the following pages:

[Legal Notice](#)

[Privacy Policy](#)

The personal data collected and the purpose of its processing by the Data Controller vary depending on the information collection method:

- **Contact forms:** The Data Controller requests personal data, which may include: first and last names, email address, phone number, and website address, for the purpose of responding to User inquiries, providing information and demonstrations of the Data Controller's products and services, including quotes.

For example, the Data Controller uses this data to respond to messages, questions, complaints, comments, or concerns that Users may have regarding the information included on the Website, the products and services provided through the Website, the processing of personal data, matters regarding the legal texts

included on the Website, as well as any other inquiries the User may have that are not subject to the Website's terms and conditions or the terms of service.

- **Feedback forms:** The Data Controller requests personal data, which may include: first and last names, email address, and website address, for the purpose of responding to User comments.
- **Product or service order forms:** The Data Controller requests personal data, which may include: first and last names, identification document (tax ID number, foreigner ID number, passport, or residence permit), email address, mailing address, phone number, and payment information (payment methods or bank details) for the purpose of maintaining a business relationship with the User, shipping orders, providing the contracted services, and billing and collecting payment for the contracted products or services.
- **Content Subscription Forms:** The Data Controller requests the following personal data: first and last names, email address, phone number, and website address to manage the subscription list, send newsletters, promotions, and special offers. The personal data provided to the Data Controller will be stored on the servers of ActiveCampaign, LLC ("ActiveCampaign"), located in the United States.

The Data Controller processes personal data for other purposes as well:

- To ensure compliance with the terms set forth in the Legal Notice page and with applicable law. This may include the development of tools and algorithms that help the Website ensure the confidentiality of the personal data it collects.
- To support and improve the services offered by this Website.
- To analyze user browsing behavior. The Data Controller collects other non-identifying data obtained through the use of cookies that are downloaded to the User's computer when browsing the Website; the characteristics and purpose of these cookies are detailed on the Cookie Policy page.
- To manage social media. The Data Controller maintains a presence on social media. If you follow the Data Controller on social media, the processing of personal data will be governed by this section, as well as by the terms of use, privacy policies, and access regulations applicable to the relevant social media platform in each case, which you have previously accepted.

You can view the privacy policies of the major social media platforms at these links:

- Facebook
- Twitter
- LinkedIn
- YouTube
- Instagram

The Data Controller will process your personal data for the purpose of properly managing its presence on the social media platform, informing you of its activities, products, or services, as well as for any other purpose permitted by the social media platforms' regulations.

Under no circumstances will the Data Controller use followers' social media profiles to send individualized advertising.

Personal Data Security

To protect your personal data, the Data Controller takes all reasonable precautions and follows industry best practices to prevent its loss, misuse, unauthorized access, disclosure, alteration, or destruction.

The website is hosted by: Raiola Networks. Data security is guaranteed, as they take all necessary security measures to ensure it. You can consult their privacy policy for more information.

Content from Other Websites

Pages on this website may include embedded content (e.g., videos, images, articles, etc.). Embedded content from other websites behaves exactly as if you had visited the other website.

These websites may collect data about you, use cookies, embed additional third-party tracking code, and monitor your interaction using this code.

Cookie Policy

This website requires cookies to function properly; cookies are pieces of information stored in your web browser.

You can find all information regarding our cookie collection and processing policy on the Privacy Policy page.

Legal Basis for Data Processing

The legal basis for the processing of your data is:

- The data subject's consent.
- Performance of the contract or implementation of pre-contractual measures with the data subject, in order to provide a product or service purchased from the Data Controller.
- To comply with legal obligations.

Categories of Personal Data

The categories of personal data processed by the Data Controller are:

- Identifying data.
- No categories of specially protected data are processed.

Retention of personal data

The personal data provided to the Data Controller will be retained until you request its deletion.

Recipients of Personal Data

- ActiveCampaign ActiveCampaign, LLC ("ActiveCampaign"), based in the United States.

For more information, visit: <https://activecampaign.com>

ActiveCampaign, LLC processes the data for the purpose of providing its email marketing services to the Data Controller.

- Google Analytics is a web analytics service provided by Google, Inc., a Delaware corporation with its principal office at 1600 Amphitheatre Parkway, Mountain View, California, CA 94043, United States ("Google").

Google Analytics uses "cookies," which are text files placed on your computer, to help the Data Controller analyze how Users use the Website. The information generated by the cookie regarding your use of the Website (including your IP address) will be transmitted to and stored by Google on servers in the United States.

More information at: <https://analytics.google.com>

You can learn how Google handles privacy regarding the use of cookies and other information on Google's Privacy Policy page:

<https://policies.google.com/privacy?hl=es>

You can also view a list of the types of cookies used by Google and its partners, as well as all information regarding their use of advertising cookies, at:

- Types of cookies used by Google
- How Google uses cookies for advertising.

Web Browsing

When browsing the Website, non-identifying data may be collected, which may include your IP address, geolocation, a record of how you use the services and sites, browsing habits, and other data that cannot be used to identify you.

The Website uses the following third-party analytics services:

- Google Analytics.

The Data Controller uses the information obtained to gather statistical data, analyze trends, administer the site, study browsing patterns, and collect demographic information.

The Data Controller is not responsible for the processing of personal data carried out by websites that you may access through the various links contained on the Website.

Accuracy and Truthfulness of Personal Data

You agree that the data provided to the Owner is correct, complete, accurate, and current, and you agree to keep it duly updated.

As a User of the Website, you are solely responsible for the truthfulness and accuracy of the data submitted to the Website, thereby releasing the Owner from any liability in this regard.

Acceptance and Consent

As a User of the Website, you declare that you have been informed of the terms and conditions regarding the protection of personal data, and you accept and consent to the processing of such data by the Data Controller in the manner and for the purposes set forth in this Privacy Policy.

To contact the Data Controller, subscribe to a newsletter, or post comments on this Website, you must accept this Privacy Policy.

Changes to the Privacy Policy

The Data Controller reserves the right to modify this Privacy Policy to adapt it to new legislation or case law, as well as to industry practices.

These policies will remain in effect until they are replaced by others that are duly published.

PRIVACY POLICY

We have adapted our privacy protocols and policies to comply with the European General Data Protection Regulation 679/2016 (GDPR), as we are committed to the security and protection of the data we process.

1.- WHO IS THE DATA CONTROLLER

INSTITUTO NUTRIGENOMICA SL, located at PZA SANTA BARBARA, No. 6 – 2nd FLOOR, 28004 MADRID (MADRID), is responsible for the proper processing of your data. You may inquire about this processing via the following info@nutriprivilege.com

2.- WHAT WE USE YOUR DATA FOR AND HOW LONG WE RETAIN IT

At INSTITUTO NUTRIGENOMICA SL, we process the information provided by data subjects for the following purposes:

- To fulfill the services and obligations agreed upon with the client
- To process and manage requests related to products and services.
- Send advertising or promotional information about products and/or services.
- Manage subscriptions to newsletters and/or the blog on a regular basis.

The personal data provided will be retained for as long as the contractual relationship remains in effect and the data subject does not request its deletion.

There is certain data that, by its nature, we must retain even if you withdraw your consent due to the existence of a legal obligation

3.- WHAT IS THE LEGAL BASIS FOR DATA PROCESSING

The use of the data you have provided is necessary for the proper management of our relationships with customers and partners, as well as to comply with legal obligations.

You may object to the use of your data at any time, thereby halting any processing of such data; your data will remain blocked only for the period required by law. Please be advised that failure to consent may make it impossible for us to provide our services.

4.- WILL MY DATA BE SHARED?

In principle, data will not be shared unless required by law.

However, your data may be transferred to professionals and/or suppliers of this Entity solely for the purpose of contractual compliance, or to service providers of this Entity, such as consulting firms, IT services, cloud storage services, etc.

5.- HOW LONG WE WILL RETAIN YOUR PERSONAL DATA

We will only retain your personal data for as long as we maintain a contractual relationship, for as long as there is a legal requirement to do so, and for as long as you do not exercise any of the rights that would prevent us from processing your data.

6.- HOW CAN I EXERCISE MY RIGHTS

As the data subject, you have control over your data and may therefore exercise your rights at any time by sending an email to info@nutriprivilege.com.

The rights you may exercise are:

- Right to request access to personal data concerning the data subject
- Right to request the rectification or erasure of such data
- Right to request the restriction of processing
- Right to object to processing
- Right to data portability

Users are informed that they have the right to withdraw their consent at any time, without this affecting the lawfulness of processing based on consent prior to its withdrawal.

Data subjects are also informed that they may file a complaint with the competent Data Protection Supervisory Authority, particularly when they have not received a satisfactory response regarding the exercise of their rights.

You may exercise all your rights by providing your name and submitting a photocopy of your identification along with your request.

NOTICE REGARDING THE COLLECTION OF DATA THROUGH WEB FORMS

We inform you that the personal data obtained through this form, as well as your email address, have been included in the CLIENTS/SUPPLIERS or WEB USERS database, for which INSTITUTO NUTRIGENOMICA SL is responsible, for the purpose of responding to your inquiries and sending you information related to the organization that may be of interest to you.

INSTITUTO NUTRIGENOMICA SL undertakes to use the data collected through this form solely for the aforementioned purpose.

The data subject declares that they are aware of the purpose and use of the personal data collected by reading this clause.

Sending this email implies acceptance of the foregoing.

If you wish to exercise your rights of access, rectification, erasure/right to be forgotten, objection, restriction of processing, and data portability under the terms established in the EU GDPR, you may do so by contacting INSTITUTO NUTRIGENOMICA SL, PZA SANTA BARBARA, No. 6 – 2nd Floor, 28004 MADRID (28008-MADRID)

CONSENT TO THE PROCESSING OF PERSONAL DATA

The data collected, in accordance with the GDPR (EU) 679/2016, under this contract will be included in a file named CLIENTS/SUPPLIERS or WEB USERS, owned by INSTITUTO NUTRIGENOMICA SL (hereinafter “Data Controller”) with Tax ID: B98621444

This data will be stored in our database for the duration of our agreed-upon relationship. The purpose of this collection is the management of your personal data.

If you agree to the processing of your data under the terms provided, you may consent by checking the corresponding box for the following purposes:

ADMINISTRATIVE MANAGEMENT OF MY DATA

MANAGEMENT FOR COMMERCIAL COMMUNICATIONS

Otherwise, it will be understood that you do NOT give your consent.

Consequently, as the data subject, you hereby give your consent and authorization to the Data Controller to include your data in the aforementioned database. If you, as the data subject, do not give your consent, this could affect our relationship in the following way: It would make it impossible to carry out the procedures described above.

The data subject declares that they are informed of the conditions and transfers detailed in this clause and, in any case, may exercise their rights of access, rectification, erasure/right to be forgotten, restriction of processing, data portability, and objection (always in accordance with the provisions of current legislation) free of charge by contacting INSTITUTO NUTRIGENOMICA SL, located at PZA SANTA BARBARA, No. 6 – 2 IZDA 28004 MADRID (28008-MADRID), indicating in the communication “EXERCISE OF RIGHTS”; or, prior to taking such action, request at the same address that the forms provided by the Data Controller for this purpose be sent to you.

Therefore, for the record and for all relevant purposes, you hereby express your agreement with the terms detailed in this clause.

ACCEPTANCE OF THESE TERMS

By using this website, we assume that the user has read this document carefully and has understood and followed its guidelines. If the user does not agree with this privacy policy or with the guidelines provided herein, please do not use our website. We reserve the right to modify these terms of use whenever we deem it necessary. Your continued use of this and other websites of INSTITUTO NUTRIGENOMICA SL after such changes have been implemented will constitute your full acceptance of them.

ABOUT COOKIES

Cookies are a tool used by web servers to store and retrieve information about their visitors or users. They are simply text files that some servers install while you browse, allowing them to gather information such as: the location from which you access the site, the duration of your session, the device you use (desktop or mobile), the operating system and browser used, the most visited pages, the number of clicks made, and data regarding your online behavior. They do not

provide references that allow the user's first and last names to be deduced, and they cannot read data from your hard drive or install viruses on your devices. Furthermore, they cannot read cookies stored on the user's hard drive by other servers.

Why are they important?

The website is accessible even if cookies are not enabled; however, disabling them may prevent the site from functioning properly.

From a technical standpoint, cookies allow websites to operate more efficiently and adapt to user preferences, such as storing the language, country currency, or detecting the device used to access the site.

They establish levels of protection and security that prevent or hinder cyberattacks against the website or its users.

They allow media managers to access statistical data collected to improve the quality and experience of their services.

They help optimize the advertising we show to users, offering content that best matches their interests.

Authorization for the use of cookies

A Cookie Notice appears on the website that the user or visitor can accept, thereby expressly consenting to the use of cookies as indicated below.

The user can configure their browser to reject all cookies by default or to receive an on-screen notification upon the receipt of each cookie and decide whether or not to install it on their hard drive.

Browser Settings

INSTITUTO NUTRIGENOMICA SL reminds its users that the use of cookies may be subject to their consent during the installation or update of the browser they use.

This consent may be revoked through the content and privacy settings available in the browser. The Data Controller recommends that users consult their browser's help section or visit the help pages of the major browsers: Firefox, Internet Explorer, Safari, and Chrome.

If you would like more information on how to revoke your consent or on the procedure for disabling cookies, as well as to ask any questions regarding the

Cookie Policy, you may contact the Data Controller via the following email address: info@nutriprivilege.com

or info@nutriprivilege.com, indicating “Cookie Policy” in the subject line.

Types of Cookies Used on the Website

Users browsing the Website may encounter cookies placed directly by the data controller, or cookies placed by entities other than the data controller, as detailed in the following sections:

- Session cookies expire when the user leaves the page or closes the browser; that is, they remain active for the duration of the visit to the website and are therefore deleted from your computer upon leaving.

- Persistent cookies expire once they have served their purpose or when they are manually deleted; they have an expiration date and are typically used during online purchases, for personalization, or during registration, so you don't have to enter a password repeatedly.

Depending on the entity that manages the device or domain from which the cookies are sent and processes the data obtained, we can distinguish between first-party and third-party cookies.

- First-party cookies are those sent to the user's computer and managed exclusively by us to ensure the Website functions optimally. The information we collect is used to improve the quality of our service and your user experience.

- Third-party cookies: When the user interacts with the content on our website, third-party cookies may also be set (for example, when clicking social media buttons or viewing videos hosted on another website). These are cookies set by a domain other than our website. We cannot access the data stored in cookies from other websites when you browse those websites.

Browsing this website means that the following types of cookies may be installed:

COOKIE TYPE DESCRIPTION EXAMPLE OF USE

PERFORMANCE

- These cookies are used to improve your browsing experience and optimize the performance of our websites.

- They store service settings so you don't have to reconfigure them every time you visit us.
- Volume settings for video and audio players.
- Optimal video streaming speeds.
- Stores purchases made in a "shopping cart" on e-commerce services.

GEOLOCATION

- These cookies are used to store geolocation data from your computer or devices to provide you with more relevant content and services.
- Content tailored to your country, city, language, etc.

REGISTRATION

- Registration cookies are created when you register or log in to one of our websites.
- You can remain logged in even if you close your browser; thus, when you return, you will still be logged in unless you log out or close the session.
- To access certain areas of our websites, for example, to participate in a contest.

ANALYTICS

- These cookies collect information about your browsing experience on our websites in a completely anonymous manner
- We can count the number of visitors
- We can determine if a user is a returning visitor
- This information can help us improve navigation and enhance our service

ADVERTISING

- These cookies collect information about the ads displayed to each anonymous user on the websites
- Tailor advertising to the type of device the user is connecting from.
- Provide ads managed by third parties that are displayed on the page in real time