

# Legal notice and privacy policy

## I. INTRODUCTION

Through this Legal Notice and Privacy Policy, ESTUDIO SAMPERE, S.A. with registered office at C/ Don Ramon de la Cruz, 83, 28006, Madrid, informs users of its website (hereinafter the "Web"), about the terms and conditions of use of the Web, as well as its privacy and personal data protection policy so that users can freely and voluntarily determine if they wish to provide the personal data that may be requested when using the services offered by ESTUDIO SAMPERE, S.A. through the mentioned means.

- 1. Owner of www.sampere.com website: ESTUDIO SAMPERE, S.A.
- 2. Registered office: C/ Don Ramón de la Cruz, 83, 28006, Madrid
- 3. Tax ID Number: A-78163805
- 4. Registered in the Mercantile Registry of Madrid, Volume 1462, Sheet 147, Page 67.746
- 5. Email address: sampere@sampere.com

# II. TERMS AND CONDITIONS OF USE

Any person accessing the Website is assumed to be a user, so they must commit to the observance and strict compliance with the provisions set forth herein, as well as any other legal provision that may be applicable.

The user agrees not to use this website for fraudulent purposes, as well as not to carry out any conduct that could damage the image, interests, and rights of ESTUDIO SAMPERE, S.A. In the event of a breach of the terms and conditions of use of this website by the user – or reasonable suspicion by the company that the user is not in compliance – ESTUDIO SAMPERE, S.A. reserves the right to limit, suspend or terminate their access to the Web, adopting any technical measure required for that purpose.

# PERSONAL DATA PROTECTION AND OTHER PORTAL USER'S DATA

In accordance with the provisions of Regulation (EU) 2016/679 of the European Parliament and of the Council, of April 27, 2016, on the protection of natural persons with regard to the processing of personal data and the free movement of these data, you will find below all the relevant information on how we process the personal data shared with us by you.

#### Who controls the processing of your data?

The Data Processing Controller is ESTUDIO SAMPERE, S.A., with Registered Office at C/ Don Ramon de la Cruz, 83, 28006, Madrid, Telephone +(34) 914314366, e-mail address: <a href="mailto:sampere@sampere.com">sampere@sampere.com</a>.

#### For what purpose do we process your personal data?

Estudio Sampere, S.A. shall process your personal data in order to manage your relationship with us, and also to send you commercial communications by any means – even once the relationship is finished – to keep you updated with our products and services similar to those requested by you.

Likewise, we inform you that, in order to be able to offer you the services of Estudio Sampere, S.A. or third Parties appropriate to your interests and to improve your user experience of our Web, we will elaborate a "commercial profile" based on both the information provided by you and that arising from your use and browsing habits or obtained from social networks.

Additionally, your personal data will be transferred to the following schools, which offer courses or programs chosen by you, including schools located outside the European Union if the school of your choice is outside the European Union:

#### **SALAMANCA:**

SALAMANCA SPANISH SCHOOL SL, CIF B-84450444, Cuesta de San Blas, s/n 37002 Salamanca

#### **CUBA:**

ASOCIACION CUBANA DE ESPERANTO, COOPERATIVA DE IDIOMAS Calle Vista Alegre num. 264 entre Juan Bruno Zayas y Luz Caballero La Víbora -La Habana (CUBA)

#### **ECUADOR:**

CENTRO DE ESPAÑOL CESCUENCA Calle Hermano Miguel núm. 3-43 Cuenca (ECUADOR)

Likewise, your data may be transferred to those responsible for the provision of services chosen by you, such as, for example, those in charge of your accommodation, transportation and/or socio-cultural and recreational activities, including those responsible for the provision of services outside the European Union if the school of your choice is located outside the European Union.

#### How long will we keep your data?

We shall keep personal data of users to the extent required to use them according to the purpose for which they were collected, and in accordance with the legal basis for their processing.

We will keep personal data as long as there is a contractual or commercial relationship with the user, in compliance with a legal obligation and during the time indicated by law and for commercial reasons. The personal data provided shall be kept as long as you do not exercise your right of deletion, opposition to the processing of your data for the purposes of direct marketing, withdrawal of consent, or when the processing controllers consider that the data are no longer necessary to develop commercial actions since they are not appropriate, relevant or are outdated.

In any case, ESTUDIO SAMPERE, S.A. reserves the right to keep your data duly blocked, without making any use of them, as long as they may be required for the exercise or defence of claims or for any type of judicial, legal or contractual responsibility that may arise from their processing for which data recovery is necessary.

ESTUDIO SAMPERE, S.A. shall comply with regulations in force regarding the duty to cancel personal information that has ceased to be necessary for the purpose or purposes for which it was collected, blocking it in order to be able to meet possible responsibilities arising from the data processing, and only during the limitation periods of such responsibilities. Once such periods have expired, this information shall be definitively removed by safe methods.

#### What is the legitimacy for the treatment of your data?

The legal basis for the processing of your personal data is to execute and manage the relationship with you, as well as the express consent that, where appropriate, you have provided us for additional processing which consists in sending our own or third-party commercial communications, the preparation of commercial profiles and the transfer of the mentioned data and profiles to the rest of the companies *having the purposes indicated in the preceding Section* "For what purpose do we process your personal data?".

We inform you that the personal data requested by telephone or in any of our forms in paper format at the time of registration on this website are strictly necessary to formalize and manage the relationship with you. In the case of not having them provided by you, we will not be able to maintain such a relationship. In any case, this main purpose is not subject to consent for the processing of data that is not required for such main activity.

As previously indicated, the prospective offering of own or third-party products and services – as well as the preparation of commercial profiles and the transfer of those profiles and their personal data to third companies – constitute additional processing based on the consent required, without in any case making the withdrawal of the consent conditional to the maintenance of your relationship with us.

#### To which recipients will your data be communicated?

Only with your consent will your personal data and, where appropriate, your commercial profile be communicated to the rest of the companies with the purposes indicated in the section "For what purpose do we process your personal data?" of the present privacy policy.

#### What are your rights when you share your data with us?

All individuals have the right to obtain confirmation on whether at Estudio Sampere, S.A. we are processing personal data that concerns them or not.

Likewise, those interested have the right to access their personal data, as well as to request the rectification of inaccurate data or, where appropriate, request its deletion when, among other reasons, the data is no longer necessary for the purposes for which they were collected.

Under certain circumstances, the Interested Parties may request the limitation of the processing of their data, in which case we will only keep them for the exercise or defense of claims.

Under certain circumstances and for reasons related to their particular situation, Interested Parties may object to the processing of their data. Estudio Sampere, S.A. shall cease to process the data, except on compelling legitimate grounds or for the exercise or defense of possible claims.

Likewise, Interested Parties have the right to receive their personal data shared with us – in a structured format, of common use and machine-readable – and transmit them to another processing controller.

Interested Parties may exercise the mentioned rights and withdraw the consents at any time, where appropriate, by letter addressed to Estudio Sampere, S.A. C/ Don Ramón de la Cruz, 83, 28006, Madrid, or by e-mail to soporte@sampere.com. In this regard, we inform you that you have the models for exercising the aforementioned rights at your disposal on the website of the Spanish Data Protection

Agency www.agpd.es/portalwebAGPD/CanalDelCiudadano/derechos/principales\_derechos.

If the interested Party deems it appropriate, they may file a claim before the Spanish Data Protection Agency, especially when the former considers that we have not duly fulfilled their rights. Such claim may be filed before the aforementioned authority through the different options offered by the website of the Spanish Data Protection Agency.

# III. COOKIES

Estudio Sampere, S.A. informs you that our Web uses cookies. Uninstalling them will prevent the page from working properly.

Cookies are a file that is downloaded to your computer when you access certain websites. Cookies allow a website, among others, to store and recover information about the browsing of a user or their equipment, and, depending on the information contained and the way they use their equipment, they could be used to recognize the user.

The types of cookies used by this Web are the following:

**Technical Cookies** are those that allow the user to browse through a website, platform or application and use their different options or services such as traffic control and data communication, session identification, access to restricted access areas, a compilation of the elements making up an order, performing the purchase process of an order, requesting registration or participation in an event, using security elements during browsing, storing content for the dissemination of videos or audios or sharing content through social networks.

**Personalization Cookies** are those that allow the user to access the service in the user's terminal with some predefined general characteristics based on a series of criteria.

Analysis Cookies are those that allow the processing controller to monitor and analyze the behavior of users of websites to which they are linked. The information collected through this type of cookies is used in the measurement of the activity of the website, application or platform, and for the elaboration of browsing profiles of users of those websites, applications, and platforms in order to introduce improvements according to the analysis of the use of data made by the users of the service.

The application we use to obtain and analyze the browsing information is Google Analytics: <a href="https://www.google.com/analytics">www.google.com/analytics</a>

This application – developed by Google – provides us the analysis service of our website audience. The mentioned company can use these data to improve its own services and to offer services to other companies. You can get to know these other uses from the indicated links.

This tool does not obtain data from user names, surnames, or postal addresses from where they connect. The information obtained is related, for example, to the number of pages seen, language used, a social network in which our news is published, city to which the IP address from which users access is assigned, number of users that visit us, frequency and reoccurrence of visits, visit time, browser used and operator or type of terminal from which the visit is made.

We use this information to improve our Web, detect new needs, and evaluate the improvements to be introduced in order to provide a better service to the users who visit us.

You can find out, allow, block or remove the cookies installed on your computer by configuring the browser options installed on it. You will find information on how to do it depending on your browser:

- Firefox: support.mozilla.org/es/kb/cookies-informacion-que-los-sitios-web-guardan-en-
- Chrome: support.google.com/chrome/bin/answer.py?hl=es&answer=95647
- Explorer: windows.microsoft.com/es-es/windows7/how-to-manage-cookies-in-internet-explorer-9
- Safari: support.apple.com/kb/ph5042
- Opera: help.opera.com/Windows/11.50/es-ES/cookies.html

# IV. LINKS TO OTHER WEBSITES

There are links to other websites available on our Web. These links are provided at the convenience of the user, but we do not review, control or monitor privacy practices of third-party websites. Our policy does not cover websites maintained by third parties. We are not responsible for the activities on those websites or transactions carried out by third parties. We encourage users to read the content of privacy statements published on the websites of collaborators, particularly if data of users are collected through these pages.

# V. SOCIAL NETWORKS

The user who becomes a fan, follower or similar of Estudio Sampere, S.A. in the different social networks is subject to compliance with this Legal Notice and the terms and conditions established by the relevant Social Network, so we recommend you to review Privacy Policies before creating a profile.

The user is responsible for the access and use made of the profile of Estudio Sampere, S.A. in the different social networks, and must take into account that the published data, comments and name of their profile, and the photograph included in it – where appropriate – may be accessible to other fans or members.

Profiles created by Estudio Sampere, SA, in different social networks are intended for legal age persons. In the event that minors or people under guardianship access any of these profiles, they must be in the company of their parents, guardians or legal representatives, who shall be considered responsible for all acts performed by them.

The data that social network users make available to Estudio Sampere, S.A. shall become part of a file of its responsibility and, therefore, used according to the protection policy included in clause 6 of the present Legal Notice.

Regarding rights of access, rectification, cancellation and opposition under Data Protection Law, the user must review the configuration of their profile or exercise the mentioned rights before the relevant social network. Estudio Sampere, S.A. can only consult or remove data in a restricted way since it has a specific profile. For any exercise of rights against Estudio Sampere, SA, please send a letter to C/ Don Ramón de la Cruz, 83, 28006. Madrid. Spain, including a copy of the National Identity Card or alternative documentation proving your identity.

# VI. MINORS AND PEOPLE UNDER GUARDIANSHIP

To make use of the services of <a href="www.sampere.com">www.sampere.com</a>, minors or people under guardianship must be in the company of their parents, guardians, teachers or legal representatives, who shall be considered responsible for all acts performed by the mentioned minors or people under guardianship.

Parents, guardians, teachers or legal representatives are obliged to control and restrict access to websites that are considered unsuitable for minors, and communicate to ESTUDIO SAMPERE, S.A. any type of anomaly on <a href="https://www.sampere.com">www.sampere.com</a> regarding its content.

## VII. INTELLECTUAL PROPERTY

The content of the Website is an original work protected by Intellectual Property Law with all rights reserved by ESTUDIO SAMPERE, S.A. The reproduction or transmission in any form or by any means of part or all the content of the material of this Web, including but not limited to contracts, text, graphics and design code, shall not be allowed without prior authorization from the author. At no time shall it be copied, modified or its source code decompiled by reverse engineering or any other technique for the purpose.

All logos and trademarks of this page are registered as trademarks in the corresponding public registers, enjoying public trust in the event of any type of controversy in this regard.

Logos other than those of ESTUDIO SAMPERE, S.A. that may appear on the Web are the property of their respective owners, being in any case responsible for any possible dispute that may arise regarding them. In any case, these logos shall be included on the Web only with the prior communication and approval of their owners.

The Web design – including its programming, edition, compilation and other elements necessary for its operation – is the property of ESTUDIO SAMPERE, S.A. Therefore, the express and written authorization of ESTUDIO SAMPERE, S.A. shall be required for its partial or total reproduction, as well as for operation, distribution and commercialization in general.

Claims that may be filed by users in relation to possible breaches of intellectual or industrial property rights over any of the Contents of this Web must be addressed to the following e-mail address: <a href="mailto:sampere@sampere.com">sampere@sampere.com</a>.

# VIII. REPORTING ILLICIT CONDUCT

In the event that any user or third Party considers that there are facts or circumstances that reveal the illicit nature of the use of any Content or the performance of any activity on the Web that could constitute an infringement of copyright, intellectual property rights, industrial property rights or other rights, they shall have the obligation to report it by sending a notification containing the following information:

Name, address, telephone number and e-mail address of the claimant.

Details of the alleged illicit activity carried out in the Portal and – particularly in the case of an alleged infringement of rights – a precise and concrete indication of the protected contents, as well as their location within the Website.

Facts or circumstances that reveal the illicit nature of the activity.

In the case of infringement of rights, handwritten signature or equivalent with the personal data of the owner of the rights allegedly infringed or those of the person authorized to act in their name and on their behalf.

Express and clear declaration under the responsibility of the claimant stating that the information provided in the notification is accurate and the unlawful nature of the use of contents or activities described.

In this regard, all Notifications made by ESTUDIO SAMPERE, S.A. to the user shall be considered valid if they are made using the data provided by them through the means indicated above. For these purposes, the user states that all data provided by them are true and correct, and undertakes to communicate all changes related to the notification data to ESTUDIO SAMPERE, S.A.

# IX. FINAL PROVISIONS

ESTUDIO SAMPERE, S.A. reserves the right to amend this Policy. The amendments shall be made through the publication of a new Policy on the Web. Amendments will become effective at the time of their implementation. Users are encouraged to periodically familiarize themself with the text of this Policy in order to be up-to-date on its amendments and provisions.

The use of this website implies full acceptance of this Policy. If the user does not accept it, ESTUDIO SAMPERE, S.A. cannot allow access to its services and the use of its services must cease immediately.

If not amicably settled, any disputes regarding this Policy shall be resolved before the court of competent jurisdiction.