

BARCINO HOMES PRIVACY POLICY

1. GENERAL

1.1 This privacy policy describes how BARCINO HOMES (owned by Inna Tolmacheva with NIE x9284012q and license AICAT 5525), gathers and uses personal information (from here on referred to as “BARCINO HOMES”).

1.2 As part of our commitment to privacy, we have established procedures to ensure that your information is handled responsibly and in accordance with applicable data protection and privacy laws. We therefore provide you with this privacy policy, to explain what personal information we collect about you and how we use and protect it. This privacy policy also describes your rights and how to contact us if you have any questions about how we use your personal information.

2. HOW WE COLLECT AND HANDLE YOUR PERSONAL INFORMATION

2.1 General

The term “personal information” refers to all the information related to an identified or identifiable physical person, and to any data which can identify a person directly or indirectly (“personal data”).

In this section, we describe what types of personal data we gather about you and why, what juridical basis we have for that process, and how long we keep your personal data for. To make our privacy policy as accessible as possible, we have divided this section into different categories of people.

2.2 If you visit BARCINO HOMES website

2.2.1 *What type of personal information do we handle?*

When you visit our website, BARCINO HOMES collects and handles the following personal information:

- information about how you use our website; and
- technical data like your IP address or other unique data that can identify the device you are using, as well as the operating system, the browser type, and general location information.

2.2.2 *Why do we use your personal information?*

BARCINO HOMES uses your personal information for the following reasons:

- to guarantee technical operation of our website; and
- to analyse how you use our website, so that we can improve and develop it.

2.2.3 *Juridical basis for using your personal information*

The juridical basis for using your personal information, such as technical data and your IP address when you visit our website, is that this is necessary for BARCINO HOMES’s legitimate interest in assuring the technical operation of the website, as well as in developing and improving it.

2.2.4 *For how long will we store your personal information?*

Your IP address will only be saved temporarily, as long as you are visiting our website. As for cookies, read below.

2.3 If you visit BARCINO HOMES or start a client relationship with BARCINO HOMES’s office

2.3.1 *What type of personal information do we handle?*

BARCINO HOMES collects and uses the following personal information when you register for a visit on the BARCINO HOMES website or contact BARCINO HOMES:

- first and last name;
- e-mail address;
- telephone number;

- address (if you choose to enter your address); and
- details about the visit you have registered for.

If, during or after the visit, you express direct interest in participating in a bid, BARCINO HOMES may ask you to provide additional information in order to manage offers, for example, to specify if you have received a provisional loan approval from your bank or not.

2.3.2 Why do we use your personal information?

BARCINO HOMES uses your personal information for the following reasons:

- to manage visits;
- to contact you after the visit and to respond to any questions you may have had during it;
- if you have expressed interest in receiving information about later offers, to be able to manage these;
- if you have expressed interest in a particular type of housing/real estate, to be able to respond to any questions and to help you find housing/real estate that may be of interest to you.

2.3.3 Juridical basis for using your personal information

Any use that conforms to the previous descriptions is based on our legitimate interest in (as appropriate):

- managing visits;
- contacting you to answer any questions you may have asked about the visit;
- managing any later offer;
- when you request it, responding to any questions, and, furthermore, helping you find housing/real estate that may interest you;
- promoting our business, our services, events, etc.

2.4 If you make an offer on housing or a property offered by BARCINO HOMES

2.4.1 What type of personal information do we handle?

BARCINO HOMES collects and uses the following personal information when an offer is sent for any housing/real estate that BARCINO HOMES offers:

- first and last name;
- contact details;
- details about the housing/real estate you have bid on;
- time of the bid; and
- details about the offer you have made, as well as the amount and, if you proceed, the terms of the offer.

As BARCINO HOMES engages in financial transactions you may be asked to provide additional information, such as the personal and financial information required to process those transactions. In each case, we only collect as much information as is necessary or appropriate for fulfilling our legal obligation to refrain from suspicious operations that may be funded by the means resulted from the money laundering and terrorism financing. You can always refuse to supply personally identifying information, with the caveat that it may prevent you from engaging in certain activities.

2.4.2 Why do we use your personal information?

BARCINO HOMES uses your personal information for the following reasons:

- to manage offers and inform the seller and relevant bidders about them;
- to comply with the legal requirements; and
- to document the sales processes and to defend ourselves against any legal complaints.

2.4.3 Juridical basis for using your personal information

The data usage carried out according to the previous statements is necessary for BARCINO HOMES to comply with its legal obligations under Constitutional Law 3/2018, from December 5, on the Protection of Personal Information and on the guarantee of digital rights and the obligatory regulation that the law describes.

2.5 If you contact BARCINO HOMES because you are interested in selling your housing or if you value your property through BARCINO HOMES

2.5.1 What type of personal information do we handle?

If you choose to fill out our contact form on the BARCINO HOMES website, we will collect the following personal information about you:

- first and last name;
- e-mail address;
- telephone number;

BARCINO HOMES will contact you and, according to the personal information you provide, BARCINO HOMES will also collect the following personal information:

- address;
- information about your current residence;
- your national identification number; and
- your passport number.

If you decide to hire BARCINO HOMES to value your property, we will also collect the details on the valuation done of your property.

2.5.2 Why do we use your personal information?

BARCINO HOMES uses your personal information for the following reasons:

- to contact you according to your instructions;
- to provide you with information you have requested;
- to be able to reserve a valuation of your property; and
- to promote BARCINO HOMES, our services, events, and housing/real estate.

2.5.3 Juridical basis for using your personal information

The usage is necessary for BARCINO HOMES to be able to take measures and provide information you have requested before coming to any agreement with BARCINO HOMES for mediation of your property.

The usage of your personal information for commercial purposes is based on our legitimate interest in commercializing our business, our services, events, and more.

2.6 If you buy or sell housing through BARCINO HOMES

2.6.1 What type of personal information do we handle?

BARCINO HOMES collects and uses the following personal information when you buy or sell housing/real estate through BARCINO HOMES:

- first and last name;
- address;
- telephone number;
- e-mail address;
- your passport number;
- personal identification number or equivalent foreign identification number;
- details about the housing/real estate you have bid on;
- the buying price and any other term under the transference agreement; and
- date of purchase or sale;
- information we request in relation to the law on money laundering, such as information on annual statements, employer, political activity.

2.6.2 Why do we use your personal information?

BARCINO HOMES uses your personal information for the following reasons:

- to offer the relevant housing/real estate according to the brokerage contract;
- to comply with the legal requirements; and
- to defend lawsuits.

2.6.3 Juridical basis for using your personal information

Any usage according to the previous statements is based on the following juridical bases:

- Usage is necessary to comply with the brokerage contract with the seller;
- Usage is necessary to comply with the requirements of BARCINO HOMES under the law; and

- Usage is necessary for BARCINO HOMES' legitimate interest in defending against legal complaints in the future.

2.7 If you send an e-mail to BARCINO HOMES

2.7.1 What type of personal information do we handle?

BARCINO HOMES uses the following personal information if you contact us by e-mail:

- name;
- e-mail address;
- any other personal information you provide in the e-mail sent to us.

2.7.2 Why do we use your personal information?

We use your personal information for purposes of responding to your *e-mail*.

2.7.3 Juridical basis for using your personal information

Usage in accordance with previous statements is based on BARCINO HOMES' legitimate interest in responding to your e-mail and continuing to communicate with you if you wish.

3. TO WHOM DO WE RELEASE YOUR PERSONAL INFORMATION?

3.1 BARCINO HOMES will not sell or loan your personal information to third parties. However, BARCINO HOMES may share your personal information with those associates, with whom they have agreements for purposes of being able to provide our services according to our commitment. Those associates may have access to your personal information when they provide services for us, in order to comply with the intent of using your personal information, but they will never be able to use your personal information for any other purpose.

3.2 BARCINO HOMES may share personal information as required by law or governmental requirements or, if it is necessary, to protect our legal interests or to detect or prevent fraud or other security issues.

4. HOW WE PROTECT YOUR PERSONAL INFORMATION

4.1 You should always feel safe when you send us your personal information. Therefore, BARCINO HOMES has taken the necessary safety measures to protect your personal information against unauthorized access, modifications, and deletion.

4.2 BARCINO HOMES has strict security policies in place to ensure that your data is protected from misuse, loss or alteration. We will not share your personal information with third parties unless we are required to do so by law, or if we believe in good faith that disclosure is reasonably necessary to protect our property, rights or those of third parties. BARCINO HOMES declares that it has established all technical methods within its means to avoid the loss, wrongful use, alteration, non-authorized access or theft of the data you may supply.

5. YOUR RIGHTS

Access, modifications, and additions

5.1 You always have the right to know what personal information of yours we are using and to have access to it. That means that you may request a registry extract about how we use your personal information. You also have the right to receive a copy of the personal information that is used. Moreover, you may always request that we modify or update your personal information.

Limitation, deletion, and portability of information

5.2 In particular circumstances (according to what is established in applicable information protection legislation), you have the right to request that BARCINO HOMES limits the use of your personal information or deletes your personal information. You also have the right to the portability of information. That involves the right, under certain

conditions, to extract and transfer your personal information in a format that is structured, in common use, and machine readable to another party in charge of handling it.

Objection

5.3 You have the right to object to the use of personal information that takes place after a consideration of interests. If you object to this use, we will only continue it if there are legitimate reasons for this use that prevail over your interests.

Inquiries and complaints

5.4 Do not hesitate to contact BARCINO HOMES if you have any questions about this privacy policy, the use of your personal information, or in order to exercise any of your rights as previously explained.

5.5 If you are not satisfied with our use of your personal information, do not hesitate to contact us, and we will do everything possible to respond to your remarks. Your privacy is very important to us, and we always strive to handle your personal information in the best and safest way possible. If you think that we are not meeting that goal, you have the right to present any complaints related to the usage of your personal information by BARCINO HOMES to the Information Protection Agency. You will find contact information for the Information Protection Agency at <https://www.aepd.es>

6. CONTACT

You may contact us by sending a letter to: BARCINO HOMES, Provensals, 10b, Barcelona, Spain, calling us at +34 647 183 074, or sending us an e-mail to ines@barcinohomes.com.