

Awara IT Privacy Policy

Effective Date: 15 May 2025

Awara IT Solutions S.L, a Spanish company located at Edificio Hightech Av. Diagonal, 131, 08018 Barcelona, Spain, NIF: B67289892, VAT Number: ESB67289892 ("Company", "we", "our", or "us") values your privacy. This Privacy Policy explains how we collect, use, share, and protect personal data collected through our website www.awara-it.com (the "Site") and other means if applicable, and outlines your rights under applicable privacy laws including the **General Data Protection Regulation (GDPR - Regulation (EU) 2016/679)**, the **California Consumer Privacy Act (CCPA - Cal. Civ. Code § 1798.100 et seq.)**, and other relevant privacy laws in the United States. This is a group Privacy Policy which means that it is applicable to the activities of all our affiliates.

1. Information We Collect

We collect information in several ways:

a. Personal Information You Provide

When you fill out forms, make a purchase, subscribe to our newsletter, or contact us directly, we may collect personal information such as:

- Full name
- Email address
- Phone number
- Mailing or billing address
- Payment and transaction details
- Any additional data you submit through forms or communications

b. Information Collected Automatically

When you visit our Site, we automatically collect certain information through cookies and other tracking technologies, including:

- IP address
- Browser type and version
- Pages visited and time spent on the site
- Device type and operating system
- Referring URLs

This data helps us analyze website performance, improve user experience, and detect technical issues.

2. How We Use Your Information

We use the collected data for various purposes, such as:

- To provide and manage our services and website functionality

- To personalize your experience and deliver content relevant to your interests
- To process transactions and send confirmations
- To communicate with you, including customer support, updates, and promotional emails (with consent)
- To analyze and improve our Site, services, and user engagement
- To comply with legal obligations under regulations such as GDPR and CCPA

3. Legal Bases for Processing (GDPR)

For individuals in the European Economic Area (EEA), we process your personal data under the GDPR using the following legal bases:

- **Consent** (Article 6(1)(a) GDPR): When you explicitly provide permission for specific processing
- **Contract performance** (Article 6(1)(b) GDPR): When processing is necessary to fulfill a contract or pre-contractual request
- **Legal obligation** (Article 6(1)(c) GDPR): When we must comply with legal requirements
- **Legitimate interests** (Article 6(1)(f) GDPR): When processing is necessary for our legitimate business interests, balanced against your rights and freedoms

4. Your Rights Under GDPR

If you reside in the EEA, under the GDPR you have the following rights regarding your personal data:

- **Access** (Article 15 GDPR): Request a copy of your data
- **Correction** (Article 16 GDPR): Request correction of inaccurate or incomplete data
- **Erasure** (Article 17 GDPR): Request deletion of your data when it is no longer needed
- **Restriction** (Article 18 GDPR): Request limitation of processing under certain conditions
- **Objection** (Article 21 GDPR): Object to processing based on legitimate interests
- **Data portability** (Article 20 GDPR): Request your data in a structured, commonly used format
- **Withdraw consent** (Article 7(3) GDPR): Withdraw previously given consent at any time

To exercise these rights, contact us at the email specified in Section 13 below.

5. Your Rights Under U.S. Privacy Laws (e.g., CCPA)

If you are a California resident, you have the following rights under the **California Consumer Privacy Act (CCPA)** and its amendments under the **California Privacy Rights Act (CPRA)**:

- **Right to know** (Cal. Civ. Code § 1798.110): Learn what personal information we collect and how we use it

- **Right to access** (Cal. Civ. Code § 1798.100): Request a copy of the personal data we hold about you
- **Right to deletion** (Cal. Civ. Code § 1798.105): Request deletion of your personal information
- **Right to opt-out** (Cal. Civ. Code § 1798.120): Opt out of the sale or sharing of personal data (if applicable)
- **Right to non-discrimination** (Cal. Civ. Code § 1798.125): You will not be discriminated against for exercising these rights

To make a request, please contact us at the email specified in Section 13 below.

6. Cookies and Tracking Technologies

We use cookies, web beacons, and similar technologies to:

- Recognize and remember your preferences
- Analyze traffic and performance
- Enable certain features or functions

You can manage your cookie preferences through your browser settings. Some features of the Site may not function properly without cookies.

Our use of cookies complies with applicable laws, including GDPR (Recital 30 and Article 5(3) of the ePrivacy Directive) and the CCPA.

6A. Cookie Policy

Our Cookie Policy explains what cookies are, how we use them, the types of cookies we use (i.e., the information we collect using cookies and how that information is used), and how to control cookie preferences.

What Are Cookies?

Cookies are small text files that are stored on your device when you visit a website. They help the site remember your actions and preferences over a period of time.

Types of Cookies We Use:

- **Essential Cookies:** Necessary for the website to function and cannot be switched off.
- **Performance Cookies:** Help us understand how visitors interact with our website.
- **Functional Cookies:** Enable enhanced functionality and personalization.
- **Targeting Cookies:** May be set through our site by advertising partners to build a profile of your interests.

Managing Cookies:

You can set your browser to block or alert you about these cookies, but some parts of the site may not work if you do so. Consent for non-essential cookies will be obtained where required by law, in line with Article 5(3) of the ePrivacy Directive and GDPR guidelines.

7. Data Retention

We retain personal data only as long as necessary for the purposes stated in this policy, or as required by applicable law, including Article 5(1)(e) of the GDPR. Factors affecting retention periods include:

- Legal obligations
- Contractual requirements
- Business needs
- Security and fraud prevention considerations

Once data is no longer needed, it is securely deleted or anonymized.

8. Data Security

We implement industry-standard security measures to protect personal data from unauthorized access, disclosure, or destruction. These measures include:

- Secure servers and encryption
- Access controls and authentication protocols
- Regular security audits and vulnerability assessments

These practices align with Article 32 of the GDPR and other relevant security obligations under U.S. privacy laws.

9. Third-Party Sharing and Services

We may share your data with:

- **Service providers:** Companies that perform functions on our behalf (e.g., hosting, payment processing, analytics)
- **Legal authorities:** When required to comply with legal obligations under GDPR (Article 6(1)(c)) or U.S. laws
- **Business transfers:** In case of a merger, acquisition, or sale of assets

All third parties are required to uphold privacy standards consistent with this policy and applicable laws.

10. International Data Transfers

If you are accessing the Site from outside the United States, please be aware that your data may be transferred to and processed in the United States or other countries with different data protection laws. We take steps to ensure appropriate safeguards are in place, such as:

- **Standard Contractual Clauses (SCCs)** approved by the European Commission (under Article 46 GDPR)
- **Data Processing Agreements (DPAs)** with service providers to ensure adequate protection

11. Children's Privacy

Our Site is not intended for use by children under the age of 13 (or 16 in the EU). We do not knowingly collect personal data from minors. If we become aware that we have collected personal data from a child, we will take steps to delete it promptly. This complies with the **Children's Online Privacy Protection Act (COPPA)** and GDPR Article 8.

12. Changes to This Privacy Policy

We may update this Privacy Policy periodically to reflect changes in our practices or legal obligations. When we make changes, we will revise the "Effective Date" above and notify you by posting the updated policy on this page.

13. Contact Us

If you have questions about this Privacy Policy or wish to exercise your data rights, please contact us:

Awara IT Solutions S.L.

info@awara-it.com

Mailing Address: Edificio Hightech Av. Diagonal, 131, 08018 Barcelona, Spain,