

# Privacy Policy

## 1. Introduction

This Privacy Statement provides detailed information on how our law firm collects, processes and protects personal data in accordance with the General Data Protection Regulation (GDPR) (EU) 2016/679 and the Organic Law 3/2018 on Data Protection and Digital Rights (LOPDGDD).

## 2. Data Controller

CLICKMARK, domiciled in Spain, is the entity responsible for the processing of personal data. For any questions regarding data protection, please contact us at [trademark@click-mark.com](mailto:trademark@click-mark.com).

## 3. Categories of personal data collected

We may collect the following categories of personal data:

- Identification data: first name, last name, contact details (e-mail, telephone number, address).
- Professional data: Position, employer information and legal matters of interest.
- Legal case data: Any data necessary for the provision of legal services.
- Financial data: Billing information, bank details and payment records.
- Technical data: IP address, device information and browsing behavior collected through our website.

## 4. Sources of personal data

Personal data is obtained through:

- Direct interactions (for example, when you contact us to request legal services or send an inquiry).
- Third-party sources, such as regulatory agencies, legal databases and public registries.
- Our website and electronic communications.

## 5. Purpose of processing personal data

We process personal data for the following purposes:

- To provide legal services and advice.
- To comply with legal and regulatory obligations.
- To manage relationships and communications with clients.
- To process payments and invoices.
- To ensure cybersecurity and prevent fraud.
- To improve our website and services.

## 6. Legal basis for processing

We process personal data based on:

- Fulfillment of a contract: When necessary to provide legal services.
- Fulfillment of legal obligations: In accordance with Spanish and EU legislation.
- Legitimate interest: To improve and optimize our legal services.
- Consent: When necessary for specific activities such as marketing.

## **7. Data sharing and disclosure to third parties**

We may share personal data with:

- Regulatory and public authorities: Where required by law.
- Third-party service providers: Including IT support, cloud storage and payment processors.
- Legal professionals and counterparties: Where required for case processing.

## **8. International data transfers**

If data is transferred outside the European Economic Area (EEA), we ensure compliance by means of:

- Adequacy Decisions: Countries deemed adequate by the European Commission.
- Standard Contractual Clauses (SCC): Approved safeguards for international data transfers.
- Binding Corporate Rules (BCR): Where applicable.

## **9. Data Retention Policy**

We retain personal data only as long as necessary for:

- Legal and regulatory compliance.
- Contractual obligations.
- Legitimate business interests.

Once the retention period has elapsed, the data is securely deleted or anonymized.

## **10. Rights of data subjects**

According to the GDPR and the LOPDGDD, individuals have the right to:

- Access: Request information about how we process data.
- Rectification: Correct inaccurate or incomplete data.
- Deletion (Right to be forgotten): Request the deletion of personal data under certain conditions.
- Restriction of processing: Limit the processing of data.
- Data portability: Obtain a structured copy of the data.
- Opposition to processing: Challenge the processing based on legitimate interests.
- Withdraw consent: Withdraw previously granted consent.
- File a complaint: Before the Spanish Data Protection Agency (AEPD).

Any person with whom the firm or any of its members has had any interaction or shared information with us has the right to access, rectify, delete or limit the use of such personal data. This right may be exercised by contacting us at [trademark@click-mark.com](mailto:trademark@click-mark.com).

## **11. Security measures**

We implement technical and organizational measures to protect personal data against unauthorized access, alteration, disclosure or destruction.

## **12. Updates to this Privacy Statement**

We may update this Privacy Disclosure from time to time. Any changes will be communicated through our website.