

MACHINAS DATA PROTECTION POLICY

Policy brief & purpose

Our Machinas Data Protection Policy refers to our commitment to treat information of employees, customers, stakeholders and other interested parties with the utmost care and confidentiality.

With this policy, we ensure that we gather, store and handle data fairly, transparently and with respect towards individual rights.

Your privacy is important to us. This Data Protection Policy outlines how your Personal Data will be managed properly to protect your Personal Data. Please take a moment to read this Data Protection Policy so that you know and understand the purposes for which we may collect, use and/or disclose your Personal Data.

This Data Protection Policy supplements but does not supersede nor replace any other consents which you may have previously provided to us nor does it affect any rights that we may have at law in connection with the collection, use and/or disclosure of your Personal Data. Please note that this Data Protection Policy outlines how your Personal Data will be managed in connection with your employment or prospective employment with Machinas Digital Development SL ("Machinas") only.

We may from time to time update this Data Protection Policy to ensure that this Data Protection Policy is consistent with our future developments, industry trends and/or any changes in legal or regulatory requirements. For the avoidance of doubt, if you are an employee of Machinas, this Data Protection Policy forms a part of your employment terms and conditions ("Terms and Conditions") and should be read in conjunction with such Terms and Conditions. In the event of any conflict or inconsistency between the provisions of this Data Protection Policy and the Terms and Conditions, the provisions of this Data Protection Policy shall prevail.

Scope

This policy refers to all parties (employees, job candidates, customers, suppliers etc.) who provide any amount of information to us.

Who is covered under the Data Protection Policy?

Employees of our company and its subsidiaries must follow this policy. Contractors, consultants, partners and any other external entity are also covered. Generally, our policy refers to anyone we collaborate with or acts on our behalf and may need occasional access to data.

Policy elements

As part of our operations, we need to obtain and process information. This information includes any offline or online data that makes a person identifiable such as names, addresses, usernames and passwords, digital footprints, photographs, social security numbers, financial data etc.

Our company collects this information in a transparent way; and only with the full cooperation and knowledge of interested parties. Once this information is available to us, the following rules apply.

Our data will be:

- Accurate and kept up-to-date
- Collected fairly and for lawful purposes only
- Processed by the company within its legal and moral boundaries
- Protected against any unauthorized or illegal access by internal or external parties

Our data will not be:

- Communicated informally
- Stored for more than a specified amount of time
- Transferred to organizations, states or countries that do not have adequate data protection policies
- Distributed to any party other than the ones agreed upon by the data's owner (exempting legitimate requests from law enforcement authorities)

In addition to ways of handling the data the company has direct obligations towards people to whom the data belongs. Specifically, we must:

- Let people know which of their data is collected
- Inform people about how we'll process their data
- Inform people about who has access to their information
- Have provisions in cases of lost, corrupted or compromised data
- Allow people to request that we modify, erase, reduce or correct data contained in our databases

Actions

To exercise data protection, we are committed to:

- Restrict and monitor access to sensitive data
- Develop transparent data collection procedures
- Train employees in online privacy and security measures
- Maintain secure networks to protect online data from cyberattacks
- Establish clear procedures for reporting privacy breaches or data misuse include contract clauses or communicate statements on how we handle data establish data protection practices (document shredding, secure locks, data encryption, frequent backups, access authorization etc.)

Disciplinary Consequences

All principles described in this policy must be strictly followed. A breach of data protection guidelines will invoke disciplinary and possibly legal action.

Retention of personal data

You understand and agree that Machinas may retain documents containing your Personal Data for such period as Machinas considers in its reasonable discretion necessary for legal or business purposes.

Your rights

Under the General Data Protection Regulation (GDPR) you have a number of rights with regard to your personal data. You have the right to request from us access to and rectification or deletion of your personal data, the right to restrict processing, object to processing as well as in certain circumstances the right to data portability.

If you have provided consent for the processing of your data, you have the right (in certain circumstances) to withdraw that consent at any time which will not affect the lawfulness of the processing before your consent was withdrawn.

You have the right to lodge a complaint to the Information Commissioners' Office if you believe that we have not complied with the requirements of the GDPR regarding your personal data.

Contacting us – Access and correction of your personal data

If you have any questions, complaints relating to your Personal Data, or you would like to obtain access and make corrections to your Personal Data records, please contact privacy@machinas.com.

Revisions to this Privacy Policy

Machinas may from time to time make changes to this Privacy Policy to reflect changes in its legal or regulatory obligations or in the manner in which we deal with your personal information.

We will communicate any revised version of this Privacy Policy.

Any changes to this Privacy Policy will be effective from the time they are communicated, provided that any change that relates to why we collect, use or disclose your personal information will not apply to you, where your consent is required to such collection, use or disclosure, until we have obtained your consent to such change.

This Privacy Policy was last reviewed May 24, 2018.