



# PRIVACY POLICY



Last Updated: December 17, 2024

PLEASE READ THIS PRIVACY POLICY CAREFULLY, AS IT CONTAINS IMPORTANT INFORMATION ABOUT YOUR RIGHTS UNDER THE GENERAL DATA PROTECTION REGULATION (GDPR) AND OTHER APPLICABLE DATA PROTECTION LAWS.

This Privacy Policy outlines how Tribu World SL ("Tribu," "we," "our," or "us") collects, processes, uses, discloses, and protects your personal data when you use our website, applications, and services (collectively referred to as the "Services"). By using or accessing our Services, you acknowledge that you have read and understood this Privacy Policy and agree to our data practices.

## 1. Data Controller and Scope

Data Controller:

Tribu World SL

Carretera Nacional II, Km 651.5

Club Náutico El Balís Amarre 15

Sant Andreu de Llavaneres

08392, Barcelona, Spain

Email: [info@tribuworld.net](mailto:info@tribuworld.net)

This Privacy Policy applies to all personal data collected through our Services, including, but not limited to, information collected:

- *When you visit our website.*
- *When you register for or use our services.*
- *During communication and interaction with us via email, phone, or social media.*
- *Through any features or content available on our Services.*

## 2. Legal Framework and Compliance

This Privacy Policy is governed by the General Data Protection Regulation (EU) 2016/679 ("GDPR"), the Spanish Organic Law 3/2018 on the Protection of Personal Data and Guarantee of Digital Rights (LOPDGDD), and other applicable national laws. The terms used in this Privacy Policy, such as "personal data," "processing," "data subject," and "data controller," have the same meanings as defined in Article 4 of the GDPR.

### 3. Types of Personal Data Collected

We collect and process various categories of personal data as defined under Article 4(1) of the GDPR. These include:

#### *A. Personal Data You Provide Directly*

Identity Data: Full name, date of birth, gender, and other identifiers.

Contact Data: Address, email address, and phone number.

Financial Data: Payment card details, billing address, and transaction records.

Profile Data: Username, password, preferences, feedback, and survey responses.

Communication Data: Correspondence and messages exchanged between you and Tribu.

#### *B. Personal Data Collected Automatically*

Technical Data: IP address, device type, operating system, and browser information (Article 6(1)(f) - Legitimate Interests).

Usage Data: Information about how you use our website, applications, and services.

Tracking Data: Cookies, web beacons, and other tracking technologies (in compliance with Directive 2002/58/EC and local cookie laws).

#### *C. Data Collected from Third Parties*

We may receive personal data from third parties, such as payment processors, analytics providers, advertising networks, or social media platforms, in accordance with Article 14 of the GDPR.

### 4. Purposes and Legal Basis for Processing

Our processing activities comply with the principles outlined in Article 5 of the GDPR, including lawfulness, fairness, transparency, purpose limitation, data minimization, accuracy, storage limitation, integrity, and confidentiality.

#### *A. Service Delivery and Contractual Necessity (Article 6(1)(b))*

We process your data to provide and manage our Services, authenticate your identity, and process transactions. This includes:

- Creating and managing your account.
- Delivering the features and content of our Services.
- Responding to support requests and user inquiries.

#### *B. Consent-Based Processing (Article 6(1)(a))*

- With your explicit consent, we may use your personal data to:
- Send marketing and promotional materials.
- Personalize your user experience.
- Process sensitive personal data where necessary.

#### *C. Legal Obligations (Article 6(1)(c))*

We are required to process certain data to comply with our legal obligations, such as:

- Tax and accounting requirements.
- Responding to requests from law enforcement or regulatory bodies.

#### *D. Legitimate Interests (Article 6(1)(f))*

We may process your data to pursue our legitimate business interests, provided these interests are not overridden by your rights. Examples include:

Improving our Services and user experience.

Analyzing user behavior for research and development.

Detecting and preventing fraud or abuse.

## **5. Your Rights as a Data Subject**

Under the GDPR, you have the following rights regarding your personal data:

#### *A. Right of Access (Article 15)*

You can request confirmation as to whether we process your personal data and obtain access to the specific data, the purposes of processing, and the recipients with whom the data has been shared.

#### *B. Right to Rectification (Article 16)*

You have the right to request the correction of inaccurate or incomplete personal data.

#### *C. Right to Erasure ("Right to be Forgotten") (Article 17)*

You can request the deletion of your personal data under certain conditions, such as when the data is no longer necessary for the purposes for which it was collected.

#### *D. Right to Restrict Processing (Article 18)*

You can request the restriction of processing under specific circumstances, such as when you contest the accuracy of the data or object to its processing.

#### *E. Right to Data Portability (Article 20)*

You have the right to receive your personal data in a structured, commonly used, and machine-readable format and to transfer this data to another controller.

#### *F. Right to Object (Article 21)*

You can object to the processing of your personal data based on legitimate interests, direct marketing, or automated decision-making.

#### *G. Right to Withdraw Consent*

Where we rely on your consent to process personal data, you can withdraw your consent at any time. This does not affect the lawfulness of processing based on consent before its withdrawal.

To exercise any of these rights, please contact us at [info@tribuworld.net](mailto:info@tribuworld.net). We may require verification of your identity before processing your request.

## 6. Data Sharing and International Transfers

### A. Data Sharing

We only share personal data with third parties under strict conditions. These include:

- **Service Providers:** We engage third parties to perform functions such as payment processing, analytics, marketing, and IT support.
- **Business Transfers:** If we are involved in a merger, acquisition, or asset sale, your data may be transferred to the new owner.
- **Legal Requirements:** We may disclose data if compelled by law or to protect our rights.

### B. International Transfers

If your personal data is transferred outside the EEA, we ensure that appropriate safeguards are in place, such as:

- **Adequacy Decisions:** Transfers to countries deemed adequate by the European Commission.
- **Standard Contractual Clauses:** Using EU-approved data protection clauses for transfers to non-EEA countries.

For more information about our international data transfer practices, contact [info@tribuworld.net](mailto:info@tribuworld.net).

## 7. Data Security Measures

We implement security measures in line with Article 32 of the GDPR to protect personal data against unauthorized access, alteration, disclosure, or destruction.

These measures include:

- **Encryption:** Using SSL/TLS encryption to secure data in transit.
- **Access Controls:** Limiting access to personal data to authorized personnel.
- **Monitoring and Auditing:** Regularly reviewing our security practices and conducting audits.

**Data Breach Notification:** In the event of a data breach, we will notify the relevant supervisory authority and affected individuals as required by Articles 33 and 34 of the GDPR.

## 8. Data Retention Policy

We retain personal data only for as long as necessary to fulfill the purposes for which it was collected or as required by law. Our retention criteria include:

- **Contractual Obligations:** Retaining data for the duration of your contract and for a limited period afterward.
- **Legal Requirements:** Retaining data to comply with legal and regulatory obligations.
- **Business Needs:** Retaining anonymized data for research and analytics.
- You can request the deletion of your personal data at any time, subject to legal limitations.

## 9. Cookies and Similar Technologies

Our Services use cookies and similar tracking technologies to collect data and enhance user experience. In compliance with Directive 2002/58/EC and local regulations, we:

- Use Necessary Cookies: Essential for the operation of our website.
- Use Analytics Cookies: To understand how you use our Services and improve them.
- Use Marketing Cookies: To deliver personalized advertising based on your preferences.
- You can manage your cookie preferences in your browser settings. For more details, please see our Cookie Policy.

## 10. Third-Party Services and Links

Our Services may contain links to third-party websites or services that are not operated by us. We are not responsible for the privacy practices of these third parties. We encourage you to review the privacy policies of every site you visit.

## 11. Children's Privacy

Our Services are not intended for individuals under the age of 16. We do not knowingly collect or solicit personal data from children. If we discover that we have collected data from a child under 16, we will take steps to delete that information. If you believe a child has provided us with personal data, please contact us immediately.

## 12. Changes to This Privacy Policy

We may update this Privacy Policy from time to time in accordance with Article 13(2) of the GDPR. We will notify you of any significant changes by email or through our website. We encourage you to review this policy periodically.

Last Updated: November 16, 2024

## 13. Contact Information

If you have questions or concerns about this Privacy Policy or our data protection practices, please contact our Data Protection Officer:

Tribu World SL  
Carretera Nacional II, Km 651.5  
Club Náutico El Balís Amarre 15  
Sant Andreu de Llavaneres  
08392, Barcelona, Spain  
Email: [info@tribuworld.net](mailto:info@tribuworld.net)

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