# **Privacy Policy**

Privacy Policy - Route332 Concierge Systems S.L.

Last update: July 15, 2025

Version: 1.0

Applicable law: EU GDPR, Spain LOPDGDD

#### 1. Controller:

Route332 Concierge Systems S.L. (in formation)

NIE: Z3259283-G

Calle Ceres 28, 03170 Rojales, Alicante, Spain

info@route332.com | +34 650 042 253

# 2. Purpose:

- Concierge service execution
- Customer management, billing, communication
- Technical and lifestyle support
- Legal obligations and reporting
- Marketing with consent

# 3. Data processed:

Name, contact, bookings, payments, IP, contract data

# 4. Legal basis:

- Contract performance
- Legal obligation
- Explicit consent
- Legitimate interest

# 5. Recipients:

- Accountant (Francisco Nieto)
- Notary José Luis Bellot Sempre
- Tech providers (Holded, Martin Media)

# **Privacy Policy**

- Public authorities (if applicable)
6. No international transfer outside EEA without safeguards
7. Retention:
Up to 6 years legal   2 years marketing w/o relation
8. Your rights:
Access, rectify, erase, object, portability
9. Security:
SSL, access control, antivirus, certified providers
10. Cookies:
Functional + marketing (with consent)
11. Digital confirmation:
Digital signature or confirmation link
12. Contact:
info@route332.com   +34 650 042 253
www.route332.com