

PRIVACY POLICY

This Privacy Policy (hereinafter the Policy or the Privacy Policy) is applicable to the data processing that SESAME HR carries out through the current website and/or those indicated. We recommend that you read it carefully before using this Website or providing your data through it. Do not hesitate to contact us with any questions you may have at the following e-mail address: legal@sesametime.com.

Unless otherwise specified in this Policy, your personal data will be processed by:

SESAME LABS, S.L, with NIF B98719818 and whose contact details are as follows:

- Address: Calle Travesia, S/n, Base 1 46024 - Valencia
- Contact email: legal@sesametime.com

In case you are accessing from a country located in the American continent, your data will also be processed by:

- HROSESAMEX SA de CV with RFC number HRO2305265Y7

SESAME LABS S.L. may delegate certain tasks to any of the entities described above, which are its subsidiaries, with which it has established the necessary mechanisms for the protection of personal data in their capacity as data processors.

Our Data Protection Officer / Data Protection Officer: From SESAME HR, we provide you with the contact details of our Data Protection Officer / Data Protection Officers, to whom you can address any queries you may have in relation to this Privacy Policy or the processing of your personal data.

E-mail: legal@sesametime.com.

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1. REQUIREMENTS YOU MUST MEET TO PROVIDE US WITH YOUR PERSONAL DATA

2.1. Minimum age. In order to provide us with your personal data, you must be at least 14 years of age and/or have sufficient legal capacity to use this Website.

2.2. Accuracy. When you provide us with your data to use our services, you guarantee that the data and information provided is real, truthful, updated, and also belongs to you and not to third parties.

In addition, you must notify us of any changes that occur in the data provided, responding in any case of the truthfulness and accuracy of the data provided at all times.

2.3. Age control and accuracy. SESAME HR reserves the right to verify your age and identification information at any time, if necessary, even requiring an official document or equivalent procedure and, in case of fraud detection that proves or suspects that you are under the age indicated, to delete, temporarily disable and/or cancel your account.

2. DATA PROCESSING PERFORMED THROUGH THE WEBSITE AND WHICH ARE ITS MAIN FEATURES

Below, we explain how we treat your personal information and make it available to you, in detail, all relevant information regarding your privacy:

2.1. When you contact us through our channels (contact form, chat, email):

What are the data collection methods?	<ul style="list-style-type: none"> ● Contact form ● Chat ● Emails sent to legal@sesametime.com or other SESAME email addresses. ● Phone or recording of phone interactions
Which data do we collect?	<p><u>Identification and contact information.</u> We collect your identification information (name and surname) and e-mail address, as well as any other information you voluntarily include in the communications you send us.</p> <p>We may ask you for additional information if necessary to comply with your request or requirement.</p>
What are the purposes of the processing of	<p><u>Reply to your requests.</u> The main purpose of the processing of this data will be to reply to your requests, resolve your doubts and/or provide you with the required information, as well as, if necessary, to follow up on your requests.</p>

<p>your personal data?</p>	<p>Customer Service via chat on the Website is provided by automated software (<i>chatbots</i>) in order to be able to categorize the inquiry and then forward it to the appropriate person.</p> <p><u>Improve Customer Service.</u> All the information resulting from the doubts, queries, and advice offered to the interested parties, as well as the way in which the requests are resolved, allows us to know how we provide our own customer service, allowing us to improve the quality of the same.</p> <p>Also, all the information collected, after the storage time indicated below, is anonymized and used for the purpose of analyzing the most frequently asked questions through the chat and to automate the most frequent, develop FAQs or stored for statistical purposes to develop business strategies.</p>
<p>What is the legitimacy basis that allows us to process your data? Is the submission of this data mandatory?</p>	<p><u>Consent.</u> The data provided for the above purposes will be processed on the basis of your consent, given when you voluntarily contact us through the means made available to you to request information or make a query.</p> <p><u>Legitimate interest.</u> All information collected by chat will be processed by us for statistical purposes, based on our legitimate interest to improve the quality of customer service provided. If you would like more information on the interest assessment carried out, you can request it from us at the following email legal@sesametime.com.</p> <p>The information that you are required to provide will be indicated with a star or in a similar manner. Without this information, we will not be able to respond to your inquiries or requests.</p>
<p>How long do we store your information?</p>	<p>All your personal information will be processed during the time your requests are being processed and, if necessary, to follow up on them. At the end of this period, SESAME HR will keep this information, blocked, for the duration of the periods provided for by law to meet any liabilities and to demonstrate compliance with our obligations. From this point on, SESAME HR will only process the information in an anonymized way, so it will not be possible to link the statistical information to the specific users to whom it refers.</p>
<p>To whom do we disclose your personal information?</p>	<p>We do not disclose any additional information to carry out this treatment other than those indicated, in general, in point 4: <i>To whom we disclose your personal information</i>. In this regard, some channels through which you can contact us are managed by service providers, who act as processors. You will find more information on how these service providers act in point 4, mentioned above.</p>
<p>Commercial communications</p>	<p>You authorise us to send you commercial communications to the email address provided.</p>

2.2. When you apply to a position in the “Work with us” section

<p>What are the data collection methods?</p>	<ul style="list-style-type: none"> • “Work with us” form
<p>Which data do we collect?</p>	<p><u>Identification and contact information.</u> We collect your identification information (name and surname), email address and phone number.</p> <p><u>Curricular and professional information:</u> you will be able to add a link to your online Curriculum Vitae (CV), portfolio, or personal website and add your CV as an attachment, where you can include your academic information and professional experience, as well as any other information you voluntarily want to add to your CV.</p> <p><u>Personal and additional information:</u> Besides, you will have a space in which you can include a brief description of yourself. We recommend that you do not enter sensitive information in this space.</p>
<p>What are the purposes of the processing of your personal data?</p>	<p><u>Participating in our recruitment processes.</u> If you send us your application and CV, we will process your personal information to initiate, if necessary, a recruitment process for eventual hiring and follow up on it.</p> <p>The recruitment process may involve personal or remote interviews or practical tests related to the job position or languages in which the job functions are to be performed.</p>
<p>What is the legitimacy basis that allows us to process your data? Is the submission of this data mandatory?</p>	<p><u>Implementation of pre-contractual measures.</u> The processing of data is necessary for the application of pre-contractual measures between the parties.</p> <p>The information that you are required to provide will be indicated with a star or in a similar manner. Without this information, it is not possible to initiate or continue your participation in a selection procedure or your application cannot be assessed correctly.</p>
<p>How long do we store your information?</p>	<p>The personal data provided will be treated for as long as necessary to manage the recruitment process for which you have applied or until you ask us to stop doing so, and then blocked for the legal periods of conservation as long as there may be responsibilities on the part of SESAME HR. In the event that the candidate is not selected, they will be deleted one year after the notification of rejection for the post applied for.</p>
<p>To whom do we disclose your personal information?</p>	<p>We do not perform any additional disclosure to carry out this treatment than those indicated, in general, in point 4: <i>To whom do we disclose your personal information?</i> In this regard, we may use service providers for the provision of certain additional services (e.g., management software), who act as Processors. You</p>

	will find more information on how these service providers act in point 4, mentioned above.
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2.3. When you establish a contractual relationship with us (service delivery)

What are the data collection methods?	<ul style="list-style-type: none"> Hiring of SESAME HR Services.
Which data do we collect?	<p><u>Identification and contact information.</u> We collect your identification information (name and surname) and e-mail/postal address, as well as any information that you voluntarily wish to forward us in any of our communications.</p> <p><u>Employment information.</u> We may collect data related to the contact person representing the customer's company (name and surname, work email, position and or department within the company).</p>
What are the purposes of the processing of your personal data?	<p><u>Executing and maintaining the contractual relationship between the Parties.</u> The main purpose of the processing of this data will be to maintain and execute the contractual relationship between the parties, which may include: administrative, financial, legal, accounting, and commercial management of customer data. Provision of services. Handling of queries and complaints via the web, telephone, electronic or face-to-face means. Setting up meetings and client visits. Payment management.</p>
What is the legitimacy basis that allows us to process your data?	<p><u>Contract execution.</u> The processing of the data is necessary for the execution of the contract between the parties.</p> <p>All data requested and processed by SESAME HR for the above purposes will be necessary for the purposes indicated. If they are not provided, it will not be possible to perform the services and administrative tasks related to them.</p>
How long do we store your information?	<p>All your personal information will be processed for the duration of the contractual relationship between the parties. At the end of this period, SESAME HR will keep this information, blocked, for the duration of the periods provided for by law to meet any liabilities and to demonstrate compliance with our obligations.</p>
To whom do we disclose your personal information?	<p>We do not perform any additional disclosure to carry out this treatment than those indicated, in general, in point 4: <i>To whom do we disclose your personal information?</i> In this regard, we may use service providers for the provision of certain additional services (e.g., management software), who act as Processors.</p>

2.4. Website Navigation (cookies)

We use cookies or other tracking and tracing tools on this website to collect information about how users use the website.

For more information on how we treat such tracking tools, please visit our Cookie Policy.

2.5. When using the Whistleblowing Channel (Internal ReportingChannel)

<p>What are the data collection methods?</p>	<ul style="list-style-type: none"> • The submission of an anonymous or non-anonymous complaint through the Whistleblowing Channel
<p>Which data do we collect?</p>	<p><u>Identification information:</u> We collect any information you add to the complaint about yourself or a third party.</p>
<p>What are the purposes of the processing of your personal data?</p> <p>What is the legitimacy basis that allows us to process your data? Is it mandatory to provide this data?</p> <p>How long do we store your information?</p>	<p>Comply with the obligations imposed by Spanish Law 2/2023 of 20 February on the Protection of Persons Reporting Violations of the Law and the Fight against Corruption.</p> <p><u>Legal obligations:</u> The data provided for the above purposes will be processed in accordance with the provisions of Articles 6.1.c) of Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016, 8 of Organic Law 3/2018 of 5 December and 11 of Organic Law 7/2021 of 26 May.</p> <p>We will process all your personal information for the time necessary to decide whether to initiate an investigation into the facts reported. In any case, after three months from the receipt of the communication without having initiated an investigation, it will be deleted, except for the purpose of leaving evidence of the operation of the system.</p>
<p>To whom do we disclose your personal information?</p>	<p>Data will be transferred to SESAME HR providers who provide hosting services in order to store and process the information.</p> <p>In any case, in the event of an alleged criminal offence, the personal data may be communicated to the Public Prosecutor's Office.</p>

2.6. SESAME Profiles in Social Networks.

SESAME has a profile on the main social networks, such as *Facebook, Twitter, Instagram, LinkedIn, or YouTube*.

When you follow our profile in one of these social networks, the processing of your data will be subject to the terms of use, privacy policies, and access regulations that belong to the corresponding social network and were previously accepted by the user.

SESAME HR, in this regard, will process your data for the purposes of properly managing its presence in the social network, informing you of activities, products, or services, as well as for any other purpose that the regulations of social networks allow.

Please note that we have no influence over the information that the social network collects or how it processes it, so we recommend that you remain informed of the purpose and scope of the collection of information that is done through these social networks.

2.7. When you participate in a telematic meeting with us

What are the data collection methods?	<ul style="list-style-type: none">• Through videoconferencing and the recording of it.
Which data do we collect?	<u>Identification and contact information.</u> We collect your identification information (name and surname) and e-mail address, as well as any other information you voluntarily share in the videoconference, including voice and image.
What are the purposes of the processing of your personal data?	<p><u>To execute and maintain the contractual relationship between the Parties.</u> The purpose of the processing of this data will be to maintain and execute the contractual relationship between the parties, in relation to training, resolution of incidents and all those cases that require a telematic meeting.</p> <p><u>To maintain a pre-contractual relationship:</u> The purpose of the processing of this data will be to allow the exchange of information between you and us in the interest of acquiring a service or product offered by us.</p> <p><u>To improve the after-sales and pre-sales service.</u> All the information that we collect during videoconference sessions and are recorded allows us to improve when providing and advising on our services and products.</p>

<p>What is the legitimacy basis that allows us to process your data? Is the submission of this data mandatory?</p>	<p><u>Consent</u>. The data provided for the above purposes will be processed on the basis of your consent, given when you voluntarily take part in a telematic meeting.</p>
<p>How long do we store your information ?</p>	<p>We will process all your personal information for the duration of the exchange of pre-contractual information and/or the contractual relationship. At the end of this period, SESAME will keep this information, blocked, for the periods provided for by law in order to meet any liabilities and to demonstrate compliance with our obligations. And in any case 5 years from the date of blocking.</p>
<p>To whom do we disclose your personal information ?</p>	<p>We do not disclose any additional information to carry out this treatment other than those indicated, in general, in point 4: To whom we disclose your personal information. In this regard, some channels through which you can contact us are managed by service providers, who act as processors. You will find more information on how these service providers act in point 4, mentioned above.</p>

2.8. When you register for an event

<p>What are the data collection methods?</p>	<ul style="list-style-type: none"> • The registration form for the event
<p>Which data do we collect?</p>	<p><u>Identification and contact information</u>. We collect your identification information (name and surname) and e-mail address, as well as any other information required in the form or information you voluntarily share with us. Shall the event be recorded, this will also include voice and image.</p>

<p>What are the purposes of the processing of your personal data?</p>	<p><u>Manage participation in the event:</u> The purpose of the processing of this data will be to manage participation in the event. This includes posting images and videos of the celebration of the event on different social networks, in which your image and voice may appear. Also the sending of images that may be taken of the participants of the events.</p> <p><u>Commercial communication:</u> The purpose of the processing of this data will be to allow the sending of commercial communications to the email address provided</p>
<p>What is the legitimacy basis that allows us to process your data? Is the submission of this data mandatory?</p>	<p><u>Consent.</u> The data provided for the above purposes will be processed on the basis of your consent, given when you voluntarily take part in the event.</p>
<p>How long do we store your information ?</p>	<p>All your personal information will be processed during the time in which the event is being managed and in the case of posting images and videos the time in which these are posted.</p>
<p>To whom do we disclose your personal information ?</p>	<p>We do not disclose any additional information to carry out this treatment other than those indicated, in general, in point 4: To whom we disclose your personal information. In this regard, some channels through which you can contact us are managed by service providers, who act as processors. You will find more information on how these service providers act in point 4, mentioned above. Without prejudice to the sending of images and videos of participation in events to third party participants.</p>

2.9. When you register for an event

What are the data collection methods?	<ul style="list-style-type: none">• Registration form
Which data do we collect?	<u>Identification and contact information.</u> We collect your identification information (name and surname) and e-mail address, billing address and payment information, as well as any other information required in the form or information you voluntarily share with us.
What are the purposes of the processing of your personal data?	<u>Manage the commercial relationship:</u> The purpose of the processing of this data will be to manage the relationship as an affiliate.
What is the legitimacy basis that allows us to process your data? Is the submission of this data mandatory?	<u>Consent.</u> The data provided for the above purposes will be processed on the basis of your consent, given when you voluntarily take part in the event. <u>Execution of a contract:</u> The data is necessary for the execution of the affiliate contract.
How long do we store your information ?	All your personal information will be processed for the duration of the management and maintenance of the business relationship and for as long as SESAME HR is legally obliged to keep the data in order to protect its interests before public bodies.
To whom do we disclose your personal information ?	We do not disclose any additional information to carry out this treatment other than those indicated, in general, in point 4: To whom we disclose your personal information. In this regard, some channels through which you can contact us are managed by service providers, who act as processors. You will find more information on how these service providers act in point 4, mentioned above.

4. TO WHOM DO WE DISCLOSE YOUR PERSONAL INFORMATION?

In general, SESAME HR will not disclose your data to third parties. However, in addition to the disclosures that we specifically indicate in the section in which we explain the nature of individual operations (point 3), we inform you of the communications that we may carry out, in general, and that affect all previous data treatments and their legitimate basis.

- i. **Service providers** which are essential to provide the service we offer, either companies belonging to SESAME's company group or external service providers (e.g. computer hosting companies or platforms for sending commercial communications). Despite the above, these entities have signed the corresponding confidentiality agreements and will only treat your data according to our instructions, not being able to use them for their own purposes or apart from the service they provide us.
- ii. **Public institutions.** We may disclose to the competent public authorities the data and any other information in our possession or accessible through our systems when there is a legal obligation to do so, as well as when required, for example, when the purpose is to prevent or prosecute abuse of services or fraudulent activities through our website. In these cases, the personal data you provide would be stored and made available to the administrative or judicial authorities.
- iii. **In the event of a corporate transaction:** upon a merge, acquisition, sale of all or part of its assets or any other type of corporate transaction involving a third party, we may share, disclose or transfer user data to the successor entity (including during the pre-transaction phase).
- iv. **To third parties after aggregation or anonymization:** we may disclose or use aggregated or anonymized data (i.e.: data that cannot be linked to an identified or identifiable individual) for any purpose.
- v. **To third parties with the consent of the user or other legitimate basis:** should we wish to share data with third parties outside the scope of this Privacy Policy, we will always request your consent or inform you about it and its legitimate basis.

We also inform you that this Privacy Policy only refers to the collection, processing, and use of information (relating to personal data) by us through your interaction with our Website. The third-party websites that you can access through links from the Website have their own privacy policies over which we have no control. Therefore, before providing them with any personal information, we recommend that you carefully read their privacy policies.

5. ARE YOUR PERSONAL DATA TRANSFERRED TO THIRD COUNTRIES OUTSIDE THE ECONOMIC AREA?

Some of our service providers are located in countries outside of the European Economic Area (**EEA**).

The location of these companies outside the EEA implies the existence of an international transfer of your personal data, which may involve a lower level of protection than that provided for in European legislation. However, from SESAME we have implemented measures to ensure that such transactions do not result in a lower level of protection of your personal data.

In this regard, service providers outside the EEA are covered by one of the transfer mechanisms in Articles 44 et seq. of the GDPR. Should you require further information, please contact legal@sesametime.com

5.BIS IS YOUR PERSONAL DATA TRANSFERRED TO THIRD COUNTRIES OUTSIDE MEXICO (Only when you are a resident in Mexico)?

Some of our service providers are located in countries outside of Mexico.

6. WHAT ARE THE RIGHTS YOU CAN EXERCISE AS AN INTERESTED PARTY?

You can exercise the rights that the law guarantees you in relation to the processing of your personal data by contacting our Data Protection Representative by email at legal@sesametime.com.

Any request regarding your rights that we receive will be managed by us as soon as possible and, always, within the maximum period established by law from the time we receive it. In some cases, we may need to ask you for a copy of your identity card or other identifying documents if we need to verify your identity.

The rights that apply to you as an interested party are as follows:

i. Right to withdraw the consent given

You may withdraw your consent in relation to all consent-based processing at any time. However, withdrawal of consent will not affect the lawfulness of the processing based on the consent prior to its withdrawal.

ii. Right to access

You have the right to know what data is being processed, if any, and, if so, to obtain a copy of it, as well as to obtain information regarding:

- Origin and recipient of data
- Purposes for which data are processed
- Whether there is an automated decision-making process, including profiling
- Data storage period
- Rights provided by law

iii. Right to correction

You have the right to correct your personal data or to complete them if they are incomplete.

iv. Right to deletion

You have the right to request the deletion of your personal data if they are no longer necessary for the purpose for which they were collected or, as the case may be, if we are no longer authorized to process them.

v. Right to data portability

You have the right to request data portability in the case of processing of your data that is based on your consent or the performance of a contract, provided that the processing was carried out by automated means. In case of exercise of this right, you will receive your personal data in a structured format, commonly used and accessible by any electronic device. However, you may also request, where possible, that your data be transmitted directly to another company.

vi. Right to limit the processing of your personal data

You have the right to limit the processing of your data in the following situations:

- a) When you have requested a correction of your personal data during the period in which we verify the accuracy of them.
- b) When you consider that we are not authorized to process your data. In that case, you can ask us to limit their use instead of requesting their deletion.
- c) When you believe that it is no longer necessary for us to continue processing your data and you want us to keep them for the purposes of the exercise or defense of complaints.
- d) In cases where there is processing based on our legitimate interest and you have exercised your right to object to such processing, you may ask us to limit the use of your data during the verification of the prevalence of such interests over yours.

vii. Right to object

You have the right to object at any time to the processing of your personal data based on our legitimate interest, including profiling.

Unsubscribe from commercial communications: remember that at any time you can refuse to receive this type of communications by sending an email to legal@sesametime.com. You may also opt out of this service by following the instructions indicated at the bottom of the body of each electronic communication we send you.

viii. Right to file a complaint to the Control Authority

Remember that, at any time, and if you feel that we have violated your right to data protection, you can address your defense to the corresponding Control Authority, in the case of Spain, the Spanish Data Protection Agency (www.agpd.es).

7. HOW DO WE GUARANTEE THE CONFIDENTIALITY OF YOUR INFORMATION?

The security of your personal data is a priority for us. Therefore, SESAME HR has implemented all necessary security measures to ensure the effective use and processing of personal data provided by the user, safeguarding the individual's privacy, confidentiality, and integrity, and uses the necessary technical means to prevent alteration, loss, unauthorized access or processing of your data, according to the state of technology at all times.

Consequently, we comply with the security standards recommended to protect them. However, it is impossible to completely guarantee their security due to the nature of the Internet and because there may be malicious acts by third parties beyond our control.

We commit to act promptly and diligently in the event that data security is jeopardized or compromised and to inform you about it in case it is relevant.

8. MODIFICATIONS TO THIS POLICY

SESAME may modify the content of the privacy policy at any time, especially when there are changes in legislation, jurisprudence, or interpretation of the Spanish Data Protection Agency that affect the data processing carried out by SESAME through this Website. Any new version of this Privacy Policy will become effective on the published effective date.

We recommend that you regularly review this Privacy Policy to be informed of how your personal data is processed and protected, as well as your rights.