

## COOKIES AND PRIVACY POLICY

Privacy Policy herein governs the treatment of Personal Data concerning as consequence of the access and use of this Website (hereinafter, "**Website**"), made by **Hyperlocal Consulting, S.L.**, hereinafter **BeHappy**, with registered office in C/ Orense 99 de Pozuelo de Alarcón, 28223 (Madrid-Spain), with VAT Number nº B-86852340. Similarly, the Policy herein informs regarding the Cookies used in the Website.

### 1. PRIVACY POLICY

Using of the Website attributes You the condition of User entailing the awareness and, as the case may be, the acceptance of all the conditions included in the Privacy Policy herein. The User must read carefully the Privacy Policy in each of the occasions that he or she intends to use the Website, as the Policy herein may be modified.

**BeHappy** informs you that in order to make use of some of the telematic services offered by our Website, it is necessary for you to provide us with certain personal data subjected to automated processing, and which incorporated into our corresponding files in accordance with Organic Law 15 / 1999, of Protection of Personal Data (LOPD). We also inform you that our database is legally registered in the General Register of the Spanish Agency for Data Protection with the following reference: Customer file (2132071090).

In general, your data will be treated in order to provide the services presented through the Website and to address the different types of relations that may arise with **BeHappy** as a result of the requests or procedures that you make through the Website. Data to be treated will be such that you provide us through the various forms contained in this Website or by email, as well as those means generated during the maintenance of the corresponding relation.

#### 1.1 Personal Data Automated Treatment - Consent and Authorization

**BeHappy**, as responsible for the databases, considers that by sending your data to us through the forms provided or by e-mail, you are granting us your Authorization and expressing your consent for your data treatment in our databases for the purposes established in the Privacy Policy herein, with although of a revocable nature and without retroactive effects, and that you accept the Privacy Policy herein for your Personal Data which will be treated with absolute confidentiality always complying with all the legal requirements contained in the Spanish Organic Law 15/1999 on the Protection of Personal Data (LOPD) and the Spanish Royal Decree 1720/2007 on the development of the Protection of Personal Data and other applicable legislation. The Privacy Policy herein is governed by the regulations exclusively applicable in Spain; both national and foreign users of this Website are subjected to this Law.

Services offered through the Website are targeted for people over 18 years old. Therefore, we have no procedures to obtain parental consent in any case. By sending your data to us through the forms provided or by e-mail, therefore the User declares to be of legal age.

## 1.2 Which Data we request and for Which Purpose?

**BeHappy** informs that in no case You are obliged to provide your personal data to us. Such data are appropriate, relevant and strictly necessary to perform the purpose for which they are collected, notwithstanding, data marked with an asterisk (\*) are mandatory to supply the contracted services.

Notwithstanding different purposes that may be revealed in the data collection forms, the aim of requesting personal data through the Website is providing the services offered through it and attending the different types of relations with **BeHappy** as a consequence of the requests or procedures performed through the Website. It includes, but is not limited to, the answer to your information requests through our contact forms, and the development and performing of the contracted services (Project management, domain names registry, e-mail and hosting services, etc.) including the sending of technical information that is necessary for the proper provision and invoicing of such services.

Additionally, during the personal data collection, your consent may be requested or you may receive the possibility of opposing to the treatment of such data for a different purposes (i.e. sending of commercial communications). In the event of you not agreeing with such additional treatments, please tick or untick the appropriate box accordingly.

## 1.3 Exercising Rights of Access, Rectification, Cancellation and Opposition to the Personal Data Treatment.

At any time you have the right to oppose the treatment of your personal data and to revoke the consents provided, and the right to access our files for free in order to consult your data, rectify it in the event they are incorrect and cancel them if you do not want to be in our database. You can give us notice to **BeHappy** of the rights you need to exercise under the terms established by Law by contacting to **BeHappy** (Hyperlocal Consulting, SL) - Data Protection Manager - C / Orense 99, Pozuelo de Alarcón 28223 (Madrid-Spain) or at [sos@behappy.co](mailto:sos@behappy.co)

## 1.4 Data Transfer or Communication

**BeHappy** informs you that your data are treated confidentially and used exclusively internally and for the purposes indicated herein. Notwithstanding, data collected in the Website may be communicated to third parties when necessary for the development, maintenance and control of the relation established or when there is legal authorization. Notably, without limitation, we transfer the before mentioned personal data to the organizations authorized for the registration of Internet domains (detailed in the Domains Contract) in order to perform the registration of a requested domain name, and appear in Whois database and ESNIC (responsible for managing the Internet Domain Names Registry for the country code ".es") that govern these organizations and which include all the holders of domains currently registered, as well as other data related to administrative or technical contacts.

Except as provided in the previous paragraph, we will not transfer or communicate your data to any third party your data, unless otherwise authorized by the User.

### **1.5 Update and removal of data**

It is important that, in order to keep your personal data updated, you give us notice of any modification. Otherwise, we shall not respond to the truthfulness of your data. Similarly, we certify that all the provided are true, valid and relevant for the purpose for which we have requested them, and that you provide such data by yourself. We understand that if you do not expressly delete your personal data from our files, you are still interested in being incorporated in our database until deemed appropriate by **BeHappy**, and as long as it is suitable for the purpose for which they were obtained.

### **1.6 Automated Files Confidentiality and Security Guarantee**

In response to the trust placed by You in **BeHappy** and taking into account the importance that your personal data require in terms of protection and confidentiality, we inform you that we have adopted all the necessary technical and organizational measures in order to safeguard the security your personal data, as required by the Spanish Royal Decree 1720/2007 on Data Security that governs the regulation of security measures on files containing personal data. Notwithstanding, the user must be aware that Internet security measures are not indefeasible.

### **1.7 Commercial communications by electronic means**

**BeHappy** may send you, by electronic means (i.e. e-mail, SMS, etc.), commercial or advertising information regarding our products and services, as well as information requesting your participation in sweepstakes, events and satisfaction surveys, unless you have declared your opposition in the form corresponding. In any case, you may oppose to the sending of electronic commercial communications at any time by sending an email to the following address: [sos@behappy.co](mailto:sos@behappy.co) or using the specific means established in the commercial communications.

### **1.8 Linked Sites**

The Website may contain links to other websites external to **BeHappy**, so that we cannot guarantee or respond to the personal data treatment that the user provides to those websites. Therefore, we recommend that you review the privacy policies of such external webs.

## **2. COOKIES POLICY**

The use of the Website involves the awareness and acceptance of Cookies as defined in the Policy of Cookies herein.

## 2.1 What are Cookies?

A Cookie is a file downloaded in the user's computer when he or she accesses certain web pages. Among other things, cookies allow a website to store and retrieve information about the browsing habits of a user or his or her computer and, depending on the information contained and how they use their equipment, cookies can be used to recognize to user.

Cookies, depending on who manages the computer or domain from which cookies are sent, can be divided into First-Party Cookies (managed by a computer or domain managed by the website's own editor) or Third-party Cookies (managed by third parties treating data obtained through them).

## 2.2 Cookies used in this Website

Except for technical cookies (strictly necessary to allow the communication between the user's computer and the network in order to provide a service requested by the user), Cookies used in the Website are, in any case, **Third-party Analytical Cookies** that allow us to quantify the number of users and perform the measurement and statistical analysis of the use performed by users of the Website. For this reason, we analyse your navigation through our Website in order to introduce improvements in the operation of the Website and / or improve the offer of products or services already supplied.

Notably, Cookies used in this Website are:

TYPE	NAME	DOMAIN	ORIGIN	Further information	
Strictly necessary	Session	behappy.co	BeHappy	N/A	
Analytical Cookies	Google Analytics	__utma	Google.com	Google	<a href="https://developers.google.com/analytics/dev-guides/collection/analyticsjs/cookie-usage?hl=es">https://developers.google.com/analytics/dev-guides/collection/analyticsjs/cookie-usage?hl=es</a>
		__utmb			
		__utmc			
		__utmz			

## 2.3 Disable Cookies

At any time, the User can disable Cookies in the Website, revoking the consent given for Cookies through the configuration of the browser but this action may affect the ability to browse the web and the correct use of some functions of the web.

You can learn to disable them, depending on your browser, on the following links:

- If you use **Chrome**: <https://support.google.com/chrome/answer/95647?hl=en-GB>
- If you use **Explorer**: <http://windows.microsoft.com/es-es/windows7/how-to-manage-cookies-in-internet-explorer-9>

- If you use **Firefox**: [https://support.mozilla.org/t5/Cookies-and-cache/Enable-and-disable-cookies-that-websites-use-to-track-your/ta-p/2784#w\\_how-do-i-change-cookie-settings](https://support.mozilla.org/t5/Cookies-and-cache/Enable-and-disable-cookies-that-websites-use-to-track-your/ta-p/2784#w_how-do-i-change-cookie-settings)
- If you use **Safari**: <http://support.apple.com/kb/ph5042>

Similarly, Google offers a “Google Analytics Opt-out Browser Add-on” which can be downloaded in the following link:

<https://tools.google.com/dlpage/gaoptout?hl=en>

#### **2.4 Other links to external webs**

Users of the Website may have the option to link a number of external webs. When a user visits the content of one of those websites, he or she is leaving **BeHappy**'s web environment and entering the web environment of those websites, where different types of cookies can be used. **BeHappy** cannot access to data stored in the cookies of other websites and is not responsible for those other cookies once the user has left the Website of **BeHappy**.

If you have any questions regarding the Cookies and Privacy Policy herein, please contact us at: [sos@behappy.co](mailto:sos@behappy.co)