

PRIVACY POLICY

Introduction:

The purpose of the present Policy is to inform, pursuant to the provisions of the applicable legislation on the treatments to be performed on personal data compiled in <https://behappy.co> webpage and any of its subdomains (hereinafter, “Websites”)

Access and use of the Websites confers you the condition of user (hereinafter, “User/s or You” and involves your knowledge and acceptance of all the conditions included in the Privacy Policy herein.

Who is responsible for treatment?

Personal data will be included in a file owned by:

Identity:	Hyperlocal Consulting, S.L. (hereinafter, "BEHAPPY")
VAT Number:	B- 86852340
Address:	Calle Orense 99 de Pozuelo de Alarcón, 28223, Madrid, España.
Phone number:	34 91 005 2302
E-mail:	sos@behappy.co

How do we collect your personal data?

For using specific features in our Website, we need to collect some personal data from Users:

- (i) **REGISTRATION FORM:** Whenever you wish to hire our services, we will ask you to create an account. For such purpose, we will request your user data (name, surnames, ID number, address...), your company details (position, VAT Number, address) and payment details (for example, card account). In the event of not providing the requested data, we will not be able to provide services to you.
- (ii) **CONTACT FORM:** Through this form, we will collect your name, e-mail address and the purpose of your communication. If you contact us by WhatsApp or on Facebook or chat, we will collect your mobile phone number and, if submitted, the data you provide as regarding a potential project.
- (iii) **SIGN UP TO OUR NEWSLEETER:** We will ask for your e-mail address, in case you are interested in signing up to our newsletter.
- (iv) **Emails to hola@behappy.co and hello@behappy.co:** when the Users send an email to any of our general email address, a new request in our tickets support system is opened. In this case, we will collect your name, e-mail address and all data you submit during the communication.

We inform you that using different forms and/or features enabled on the Website is voluntary. Notwithstanding, some fields are mandatory in order to grant properly your request (for example, your contact details in order to sign up to our Newsletter). If you don't submit the requested data in the mandatory fields, the Responsible will be prevented from providing the services offered in the Website.

For what purpose do we treat your personal data?

Generally, we use your data in order to supply the services offered by BEHAPPY. In particular, below you will find some of such purposes:

- a) Manage the services of a registered user, process orders and Payments of products purchased in the Website.
- b) Development and performance of services purchased by You, for example, Project management, domains registrations, e-mail services and hosting, among others), including sending technical information required for the proper performance and invoicing of such purchased services.
- c) Manage your request, claims or complaints in the event of any contingency during your order processing, being able to ask for new personal data or confirm the data already collected if necessary or in order to prevent a fraud.
- d) Prior user authorization if needed, in order to send our Newsletter, and commercial communications on behalf of the Responsible by any means, including telephonic, telematic and electronic means (SMS, email, etc.) on the offered services as well as offering you the possibility to entry prize draws, events and satisfaction enquiries

What is the legitimacy of data processing?

Legal basis for your personal data processing is:

- User's consent provided during:
 - Newsletter sign up.
- Implementing a contractual relationship in the event of:
 - Development and performance of services purchased by You.
 - Management of signing up in the Website and features, respond to requests submitted by Users by e-mail.
 - Users sending an email to any of our general email address to open a support ticket in our system.
 - Payment management of services purchased by the User in our Website (purchases)
 - Being necessary to contact the Users if any contingency occurs while processing the purchases.
- Compliance with legal obligations in the event of:
 - Communications to Public Administrations to comply with the applicable laws (for example, to Spanish Tax Agency (AEAT), according to tax legislation).
- The legitimate interest of the Responsible in the event of:
 - Performing satisfaction enquiries regarding the quality of the services provided in the Website.
 - Other treatments enabling to customize the Access and Usage of the Website
 - Necessary for fraud prevention

Who will be the recipients of your personal data?

The Responsible will not provide your personal data to third parties, except when necessary to comply with any legal obligation.

Notwithstanding, data collected in the Website shall be provided to third parties if required for the development, maintenance and control of the relationship established or when legal authorization exists.

In particular, including but not limited to, we transfer your personal data to authorized entities for Internet domain registrations (detailed in the domains contract) in order to perform the requested name registration and to appear in the WHOIS and ESNIC database which regulate such entities and where all Domain Holders currently registered are included, as well as other data related to persons of administrative or technical contact.

Third parties information

It shall be prohibited the use of a payments means owned by a third party except in the event of prior authorization by such third party, being under their responsibility the proof of such authorization and assuming all liquidated damages that, as a consequence of this, occurs to the Responsible.

Underage users

The Website is exclusively addressed to Users over 18 years old. For this reason, if the User is underage it is expressly forbidden for him / her to use or register. No parental authorization system is provided, allowing access to the Website. By means of use or sign in, the User guarantees that he or she is of legal age.

Data accuracy and relevance

The User ensures that personal data provided to the Responsible through the Website or by any other means are accurate, being responsible for communicating any data modification. This society remains exempted from any type of responsibility in this respect. Without prejudice to the features offered by the Website at any time to amend or update your personal data, the User shall communicate the Responsible in order to update the data according to the provisions of section ***Which are your rights while facilitating your personal data to us?*** Contained in the Privacy policy herein.

How long will we preserve your data?

Please note that your personal data will be preserved only for as long as required to supply the services offered through the Website. In particular, when you register as a User in the Website, your data will be preserved until the User deletes the account.

Notwithstanding, at the end of this period, your data can be blocked and maintained by the Responsible to meet potential responsibilities resulting from data treatment but only during the prescription period of such responsibilities. After the expiry of the periods, your personal data will be deleted by the Responsible.

Confidentiality and Information security

The Responsible will treat at all times your data confidentially according to the uses and purposes established in the Privacy Policy herein. Similarly, the Responsible has adopted the technical and organizational security measures required by the applicable law to ensure the security of personal data and prevent therefore the alteration, loss, treatment or unauthorized treatment taking into account the state of technology.

Which are your rights while facilitating your personal data to us?

At all times you can request the Responsible the confirmation whether your personal data are being treated by Us and, in this case, access them. Similarly, you can request the rectification of inaccurate data or, in this case, request the deletion when, among other reasons, your data are no longer necessary for the purposes for which they were collected.

Similarly, under certain circumstances, You can request the limitation of data treatment, in this case we will only preserve data for the performance or defense of claims. Also, you can object to your data treatment under certain circumstances. The Responsible will stop treating data, on compelling legitimate grounds relating to his particular situation or performance / defense of potential claims.

Finally, when necessary, you can exercise the right of portability to obtain your data in digital format or to transmit them to another entity.

For such purpose, you can use the following channels of communication, always enclosing a copy of your ID card photocopy or of any other document that confirms your identity.

- By post mail to the address: C/ Orense 99 Pozuelo de Alarcón, 28223. Madrid, Spain.
- By e-mail to a sos@behappy.co

Finally, please note that you are entitled to submit a claim in the Spanish Data Protection Agency in the event you acknowledge or considers a fact that may produce a breach in the applicable laws regarding data protection.

Linked Sites

The Website may contain links to other websites external to the Responsible, 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.

Updates and Changes in the Privacy Policy

Responsible reserves the right for changes in the Privacy Policy herein, for this reason it is recommended for Users to check it regularly.

When significant changes occur in the Privacy Policy herein, Users will be notified for approval by means of notices on the Website or by email or by any other mean deemed appropriate for these circumstances.

If you have any doubts regarding the Privacy Policy herein, please contact us at: sos@behappy.co