**Privacy Policy** 

The following document constitutes the privacy policy of Securistore SL and incorporates the new General Data Protection Regulation (GDPR) into our company.

As a company:

\* We are committed to the protection of your personal data at all times.

\* We will never transmit your data to third parties.

\* We will use the criterion of legitimate interest when we contact you in relation to obtaining a storage price.

\* We adhere to the principles of the GDPR as soon as your data will be:

- treated legitimately, fairly and in a transparent way,

- obtained for specific, explicit and legitimate purposes and will not be treated additionally in a manner incompatible with the aforementioned purposes,

- sufficient, relevant and limited to what is necessary,
- accurate and, in the necessary cases, updated,

- stored in a way that allows the identification of people during the time strictly necessary for the purposes for which the data have been processed,

- treated in a way that ensures the appropriate security of personal data, including protection against unauthorized or illegitimate treatments and accidental loss, destruction or deterioration using appropriate technical and organizational means.

You will find below our complete privacy policy that explains what information we will collect about you, how we will use it and how we will protect that information, for how long we will keep information about you, how and when we will contact you and how you can exercise your privacy rights.

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This policy explains how Securistore SL collects and processes your personal data in accordance with the General Data Protection Regulation.

Read this information carefully to understand exactly the reasons why we collect your personal data and / or treat it and your rights about such process.

For the purposes of the General Data Protection Regulation, the data supervisor is:

Data Protection

Calle Sagra 10-16 03760, Ondara Alicante

1.- About Securistore SL

Securistore self-storage has been operating in Spain since 2003 with extensive experience in providing our international and UK customers with self-storage solutions.

We really care about the objects stored in our units. These have storage spaces divided into individual modules made of high-strength steel with sizes ranging from one cubic meter to more than 94 cubic meters that are closed by the customer with their own lock and key. We do not have access to your private storage module.

We offer you a first class store for storage that is clean, dry and very safe and can be viewed and inspected at any time without prior appointment during our normal opening hours.

**Our Services** 

This Privacy Policy refers to the self-storage service provided plus the other relevant and relative services needed for self-storage, including packaging materials, content insurance and transportation of objects.

2.- Introduction and General Conditions.

Definitions: In the following privacy policy (his / her) means the client or user of the Securistore website. (We / our / Securistore) means Securistore SL. (Website) means www.securistore.com.

Securistore is committed to the protection of your personal data and those of your family when you use our services. This Privacy Policy refers to our use of personal data that you can provide through our website and as a Securistore customer. In order to facilitate you with our services, we may collect and process your personal data. This privacy policy (Privacy Policy) therefore explains the following:

\* what personal data we can collect.

- \* how we will use your personal data.
- \* the reason and the legal justification that protects our use of your personal data.

\* when we can use your personal data to get in touch with you.

\* if we will transfer your personal data to third parties

\* for how long we will keep your personal data stored.

\* your rights in relation to the personal data you have provided to us, and

\* the use of cookies on our website and how you can remove those cookies.

Whenever you provide us with that information, we are legally obliged to use your personal data in accordance with the data protection legislation including the new General Data Protection Regulation (these laws are collectively referred to in this Privacy Policy as "the laws on Data Protection").

3.- What information will Securistore collect?

We will collect a series of personal data about you when you ask us to receive a storage price, become a customer, use other services related to storage or communicate with us through this website.

Here are the different ways in which you can interact with us and what information we will collect in each case:

3.1. When you get a price for storage:

If you request a price through the website, in our store or by phone, we will collect your following personal data: your title, your name, your last name, your email address and your number phone.

We will also ask you about the size of the storage module you need, your customer profile (domestic, professional or student), when you want to start the storage service and an approximate indication of how long the storage service will require. We may also ask you the reason for needing a storage service, for example by moving, to clear your house of junk, for the realization of housing improvements etc.

If you are a customer with a professional activity and you ask us for a price for a storage service, we will also ask you the reason why you need a storage service, for example to file, store goods or as a distribution center in addition to your sector relevant business and a URL for your website (if you have one).

3.2. When you make a storage reservation.

If you reserve a storage module through the website, by phone or in person at the store, in addition to the information that has been collected when requesting a quote (see the previous paragraph), we will also collect your full postal address and ask you if you want to have an additional access schedule to your module.

3.3 When moving to the storage module.

When you are about to take possession of your module as a customer, we will need additional personal information about you. This information can be provided through our online reservation page or can be provided in person at the store on the day you take possession of the module.

This personal information includes: your name, address, date of birth, company information, your Spanish tax identification number or your passport number, a contact name, a contact phone number, your credit card information or debit and an abbreviated inventory of what is stored in the module.

When you take possession of your module, we will also need proof to prove your identity and we will take a copy of your national identity document. This information will be stored in our client file and is used for security reasons so that we can identify you and keep proof of your identity in our file so that we can identify you when entering Securistore's premises. 3.4. When you leave the module vacant.

The only additional information that we need when you return the possession of the module is your signature on a form confirming that you have verified and confirming that the storage module is empty and there is no membership in it.

3.5. When you purchase packaging materials through our online store.

If you buy packaging materials from Securistore, you can place the order in store personally or in the online store. If you use our online store, you can choose to deliver the products at home or pick them up in person from our storage center.

For home delivery, we will collect the following data online to process and deliver your order; your title, first name, last name, email address, your phone number, your zip code and your postal address. We will also ask you online if the delivery address is the same address as the cardholder's address that pays for the products and for any specific delivery instruction.

The website also collects the data of the card with which the order is paid although this service is provided through a third party through Paypal.

Paypal has its own privacy policy regarding how your card data is collected.

For more information about Paypal's privacy policy, click here.

For Click & Collect, we will collect the following data online to process your order: full name and surname, your address, your telephone number and your credit card information.

### 3.6 Website Information We

also use cookies (see paragraph 14 below for more data) and we will process your IP address when you browse our website (an IP address is a number that specifically identifies a particular computer or other networked device In Internet). We use analytical software to visualize IP addresses and cookies in order to improve your user experience. This information is not used to develop a personal profile of you.

4.- How will Securistore use my personal data?

We will use your personal data for the following purposes:

4.1 At the time of requesting an online price for storage and at the time of obtaining services in relation to said price:

\* to provide you with an automatic copy of the price by email.

\* to facilitate you with an automatic copy of the price by text message.

\* to contact you by phone to inform you of the price.

\* to provide you with additional information regarding the price (including up to two follow-up emails and up to four follow-up calls).

\* to comply with any rule on legal, regulatory or good management obligations, and

\* for administrative and other similar purposes, including the purpose of ensuring that we have a record of its price (which will be kept in accordance with the terms of retention of personal data contained in paragraph 12 of this Privacy Policy) in case you decide to make a commission of services at a later time.

4.2. At the time of obtaining our services upon receipt of a price:

\* to facilitate the requested services and to receive payment for the services provided.

\* to send you a reservation email and other information necessary to provide the requested services,

\* to contact you by phone to confirm any reservation made and to inform you of the next steps to follow.

\* to generate a customer number and an online account to process an online reservation.

\* To call, send emails and send text messages to a customer to remind them to book online.

\* to record your alternative / emergency contact information so that you can be contacted in accordance with paragraph 8 below.

\* to provide you with a price for storage insurance.

\* to send you a copy of your storage agreement and any additional documentation related to your account, including, among other documents, a payment relationship, our terms and conditions ... etc and to provide information regarding similar services (including promotions or offers) ), unless you have chosen not to receive this type of information (see paragraph 8 below);

\* for compliance with regulatory legal obligations and other good management obligations.

\* for administrative purposes and other purposes related to these or in the cases in which we have a legal right or duty to use or disclose your personal data (including for these purposes purposes of crime and fraud prevention).

4.3. At the end of your module exit:

\* to send you a confirmation email to leave the module vacant (to confirm your departure date) and the instructions for the exit process.

\* to send you a final invoice and to process any return that may apply.

4.4 When processing any order from the online store:

\* to send a confirmation of your online order for home delivery or store pickup.

\* to deliver your order or to have it in store if you have chosen the option of collection in store.

\* to call you to report any problem or issues related to the stock of the merchandise regarding your online order or to manage appropriate alternatives.

4.5 When requesting removals, we recommend local businesses.

\* Only in the event that you have given your consent, we will send your name, your email address and / or telephone number to one of our recommended moving companies that will contact you to inform you of

your moving services.

4.6. By taking a visitor to our store.

\* We may ask for your name, the name of your company (if applicable), the registration number of your vehicle, the time of entry and departure and the date of the visit.

\* The confidentiality of this information is obtained by including a safety sheet to restrict the data from being seen by other people.

4.7 At the time of receipt and at the time of signing a delivery in the store of one of our customers.

It is limited to the name of the customer and the number of the storage module and this information will be deleted after twelve months.

4.8. When using the website in general:

\* IP addresses are used to identify your location, the number of visits from other countries and also to block disruptive uses;

\* to analyze and improve the services we offer on the website, for example to facilitate you as a user with the most enjoyable browsing experience.

\* If you publish or submit offensive, inappropriate or objectionable content on any site or on the website, or if you display disruptive behavior on our website, we would use your personal information to end such behaviors and, in those cases in which We have reasonable grounds to suspect that you may have infringed, or could be infringing, the applicable laws within the European Union (for example by publishing defamatory content), we may use your personal data to inform relevant third parties including law enforcement with Regarding its content and behavior.

\* This list of processed activities and the personal data we process may be updated at any time. When Securistore intends to use your personal data for other purposes, we will ensure that notifications are sent to you first.

\* In addition to the above, we may convert your personal data into statistical information or aggregated information but always so that you cannot be identified or identifiable based on that information. We may use or share such aggregate anonymous information to carry out market analysis and studies and even to prepare research and statistical reports. For example, we could issue reports on which of our products and services are the most popular.

5.- What is the legal justification for Securistore SL to process my personal data?

The processing of your personal data in accordance with the above, is carried out on the basis that it is necessary for the legitimate interests that we pursue and that it does not unfairly harm your rights and freedoms or legitimate personal interests. In some cases, the processing of your personal data (for example, to ensure that you receive the service provided) is also legally justified in the fulfillment of our contractual obligations derived from the services we provide.

In the cases in which we send you some commercial communications, we are obliged to obtain your consent.

If you choose not to give your consent, or if you revoke it, Securistore will not process the affected

## personal data.

Finally, the processing of your personal data for administrative and file management purposes will be based on our legitimate interest (according to the above description) but it may also be necessary for the fulfillment of all our legal obligations established under the legislation of the European Union (when relevant) and the Spanish laws that apply to us.

# 6.- How does Securistore protect your information?

Securistore applies the technical and organizational measures to protect your personal data against its illegal or unauthorized treatment, against the loss or accidental damage caused to them and in a manner that complies with the data protection legislation. These procedures imply that we will only allow authorized employees who have been trained in the correct treatment of customer information to have access to their personal information. For employees who violate our privacy policy, the usual disciplinary procedures will be opened.

7.- When will Securistore contact me?

Securistore could contact you:

\* In relation to a price provided online (as described in paragraph 3).

\* In relation to the provision of any service you have contracted to ensure that Securistore can deliver your services. For example when reserving a storage module.

\* Through periodic emails sending invoices.

\* In the cases in which you have chosen to receive specific commercial information.

\* To invite you to participate in customer surveys on Securistore services (participation will always be voluntary).

8.- Will Securistore share my personal information with someone else?

We will keep your information confidential unless your disclosure is necessary or permitted by law (for example to government agencies or law enforcement) or if it is disclosed in the manner described below.

Securistore also uses third parties to process your information from you (for example, third parties that are responsible for payment services).

Securistore also uses some independent measurement and research companies to collect information from us regarding website visitors through the use of cookies, data log files and code that are hosted on our website. We use this type of information to help improve the services we provide to our users.

We will require such third parties to only process your personal data in accordance with our instructions and we require you not to use your personal data for your own business interests.

We may also transfer your personal data to third parties (when it is lawful to do so) in relation to the sale or restructuring of our company.

Auction houses and intermediaries for the sale of merchandise.

In the event that a customer breaches his contract (for example in the case of non-payment of our invoices) and after the reasonable period of time we grant, we may recover the storage costs of his belongings in accordance with our Client License and we can deliver the Non-compliant customer belongings to an auction house.

Insurance companies.

In the event of a claim from a customer, the insurance company that has provided the customer with storage insurance that covers damage to their belongings will deal directly with the customer. The client has the responsibility of providing all necessary personal data to the insurer and any processing of their data by the insurer will be considered as a treatment of personal data carried out by an independent entity. Therefore, we recommend that you verify the company's own privacy policy.

Delivery companies that deliver orders placed online.

In the event that a customer has purchased packaging materials through our online store and has opted for home delivery, their name, address and telephone number will be provided to the delivery company for the delivery of their order. We will confirm the data of the delivery company in the confirmation of your order sent by email and the delivery company will confirm when the order has been sent and the identification code (Tricking ID) of the same.

9.- How long will Securistore keep my personal data?

Your personal data will not be kept for longer than necessary to fulfill the specific purposes detailed in this privacy policy and to allow us to comply with our legal obligations.

Any information we keep will be anonymous. Any information that could identify you as your name, address, date of birth and telephone number will be deleted after a certain period.

Therefore, the rest of the information is anonymous and will be used to analyze online and general market trends but without an inf

To avoid confusion, below you have the personal data retention deadlines for each of the cases in which we would keep your personal data:

9.1. When asking for a price for storage.

If you have asked us for a price online, by phone or in person at the store and we have created an interested customer file, we will delete your personal data after the twelve month period since your last contact with us.

9.2. When reserving a storage module (but without taking possession of the module).

If you have reserved a storage module but have never taken possession of it, we will keep your personal data for a period of 12 months from the date of reservation.

9.3. By taking possession of the module and becoming a customer of ours.

If you have taken possession of the module, and regardless of the period of time during which you will use it, we will keep your personal data for the entire period during which you are our customer.

9.4. By canceling your contract and becoming a former customer of ours.

We will keep your data for up to seven years after you leave the module. Some personal information will be deleted before the end of said period.

9.5. Customers of the online store.

All personal data that could identify you will be deleted from our customer file after a period of 12 months from the date of processing the order. Your name and address may continue to appear on our archived invoices, our credit and payment notes received that will be retained for a period of seven years from the date of purchase due to Spanish tax legislation. After the expiration of said period, all the data that could identify you will be deleted.

9.6. The retention of personal data of non-compliant customers.

For a non-compliant customer, any client that maintains a debt with us and who we may not be able to contact you with. We will retain the information of non-compliant customers for a period of seven years.

9.7. The retention of personal data during the processing of legal claims.

We may retain your personal data during the period in which you may submit claims addressed to us (normally for a period of 7 years).

9.8. The retention of personal data during the processing of claims with insurance companies.

We may retain your personal data during the period in which you could submit claims addressed to our company (normally for a period of 7 years).

9.9. The retention of your personal data in accordance with legal or regulatory obligations.

We will consider whether we need to retain your personal data after the deadline for submitting claims (see above) due to a legal or regulatory obligation. Some of these criteria may be relevant to the retention of your personal data collected in relation to our products and services.

9.10 The information of the visitors of our dependencies.

The personal data of any visitor of our dependencies that you sign to record your visit will be deleted after 12 months.

9.11 Upon receiving and signing a delivery for one of our store customers.

The information collected is limited to the name of the customer and the number of its storage module and will be deleted after a period of 12 months.

10.- What rights do I have in relation to the personal data processed by Securistore?

You have the right to request access to the personal data that Securistore has stored in relation to you. In order to comply with such a request, you must submit an Access Request. We may force you to prove your identity through two approved means of identification. We will answer a Request for Access for a period of 30 days.

In addition to your right to access your personal data guarded by Securistore, you have other rights related to your personal data in accordance with the data protection legislation. These could include (as relevant):

\* the right of rectification that includes the right to force us to correct inaccurate personal data.

\* the right to request the restriction of the processing of your personal data or the right to object to the processing of your personal data.

\* the right to request the deletion of your personal data when it is no longer necessary to retain them.

\* the right of portability of your personal data including the right to obtain personal data in a common format readable on a device in some cases in which its treatment is based on a consent.

\* the right to oppose automated decision making (if any) that could have a legal or significant effect for you as a private individual.

\* in the cases in which you have the option to provide us with your personal data or not in relation to the use of our website or in relation to any of our products or services, you have the right to be informed of the possible consequences of not providing us said consent, and

\* the right to withdraw your consent to any data processing to which you had previously given your consent.

If you would like to exercise any of your rights (or if you have any questions about your rights), direct your request and / or questions to dataprotection@securistore.com.

### 11.- The Video Surveillance System

We have installed a video surveillance system that covers both internal and external areas of buildings, including parking areas, in all our facilities. This installation responds to a purpose of public safety and security of our employees, the security of the building, the prevention and detection of crimes and the security of our dependencies and the possessions of our clients. We believe that the video surveillance system is a fundamental consideration for the promotion of the self-storage service.

We have video surveillance monitors in the reception areas of our stores that collect images of all store areas. These monitors can be seen by anyone in the reception area of our stores including our employees, visitors and our customers.

The resolution of the monitors is not usually high enough to clearly identify individuals in areas outside the reception area and are intended to alert employees that something irregular could be happening so that they could go to the area in question to investigate what happened in addition to showing customers / potential customers what is being done.

Customers and potential customers want to see the images to prove our manifestations that the storage area is being monitored through video surveillance systems.

Privacy signs in relation to the video surveillance system are placed in the reception areas and in other places of the building, on the perimeter fences and on the doors warning people that a video surveillance system is being used in building. These posters contain information about who to contact to receive additional information regarding the procedure.

The images captured through the video surveillance system will not be retained more than necessary, normally for a period of up to 60 days, and then will be automatically deleted. However, sometimes there may be a need to save the images for a longer time, for example in the case in which an incident is being investigated.

The images of the video surveillance system are stored in the Securistore servers and can be viewed / reviewed by the following people:

a.- store employees can view the images only when they are in our offices.

b.- The previously determined managers of each store will be able to access the images of the video surveillance system from anywhere.

c.- Our external security company can access our video surveillance system.

d.- Our video surveillance system maintenance company.

You have the right to view your images captured by the video surveillance system that can be exercised through an Access Request issued directly in our offices. We will only disclose the images captured to other authorized entities for the aforementioned purposes (for example a police investigation).

12.- Cookies policy.- The information that the Securistore website collects from you.

What is a cookie?

A cookie is a small amount of information that normally contains a unique identifier that is sent to the browser of your computer or mobile phone (hereinafter a "device") from the computer of a Web page and that is stored on the hard disk of your device. Each web page can send its own cookie to your browser if your browser's preferences allow it, but to protect your privacy your browser only allows a web page to access the cookies that you have already sent but not the cookies sent to you by Other web pages. Many pages do so when a user visits their website to monitor online traffic flows.

Cookies store information about your online preferences and allow us to adjust the Web pages to your interests. Users have the possibility to configure their devices to accept all cookies, to notify them when a cookie is issued or not to receive cookies at any time. This last possibility means that some personalized services cannot be provided to the user and therefore cannot fully benefit from all the advantages of the Web page. Each browser is different, so check your browser's "Help" menu to learn how to change your preferences regarding cookies. During the course of any visit to Https //: securistore.com, the pages you see, together with a cookie, are downloaded to your device. Many Web pages use this practice since cookies allow publishers of Web pages to do useful things such as finding out if the device (and probably its user) has accessed on some occasion before the page. This is done on another occasion in which the page is visited by searching and finding the cookie deposited during the last visit.

### 16.- How to contact Securistore about your privacy policy?

Questions or comments about this privacy policy are welcome. Please see our "contact us" page to see the ways in which you can contact us.

If you have any questions or comments about this privacy policy, contact:

Data Protection Securistore SL

Calle Sagra 12

03760 Ondara Alicante Spain