

Privacy Policy

Access, from our website **www.astroflow.app** or from the Astroflow mobile application, which is the responsibility of **BABILON SKY S.L.** (hereinafter the foregoing, collectively, the "Platform") to certain areas, services and products, content and/or resources of Astroflow, will only be feasible through the prior provision, by customers and users of Astroflow (hereinafter referred to individually as "User" and, jointly and indistinctly, as "Users"), of certain categories of personal data. In these cases, Users must provide certain personal data that will be subject to automated or non-automated processing by **BABILON SKY S.L.** as Data Controller duly identified in accordance with the provisions of this Privacy Policy.

In this sense, and during the process of registration and collection of personal data of its ownership, the User will be informed of which specific categories of personal data must be provided on a mandatory basis to access certain areas, services, products, and content under the responsibility of **BABILON SKY S.L.** **Consequently**, all registration and use of the Platform implies an express, specific, and informed acceptance of this Privacy Policy by the User of Astroflow.

In connection with the use and navigation of the Platform, **Astroflow** stores the data of the connection device that the User uses to access the services and resources offered through them. In this sense, when the User accesses the Platform, the system where they are hosted automatically recognizes the IP address of your device, information about your device, the type of device, such as your Internet connection, your browser type, version and operating system, the day and time you have entered, which has been disconnected, and through which parts of our Platform has moved (clickstream). It is necessary for our system to know this data and information about your device because it needs to be able to communicate with it in order to send you what you request through your browser and/or application and, consequently, for the User to be able to see it on your screen.

Neither our system nor we can know your personal data, such as name, address, telephone number, etc., if you have not provided them to us.

The system where our Platform is hosted uses, according to the configuration desired at all times by each User, cookies to facilitate the navigation of Users, as well as for statistical, personalisation and advertising purposes. See **Astroflow's** [Cookies Policy](#).

BABILON SKY S.L. reserves the right to modify, adapt or update this Privacy Policy, corresponding to each data collection, at any time and with reasonable notice, to adapt it to legislative, judicial, or jurisprudential changes that may affect it, as well as to industry practices. Without prejudice to the aforementioned, when such modifications, alterations and/or updates entail or imply a substantial or additional change in the processing of your personal data, you will be duly informed and, where appropriate, you will be asked for your consent for the new processing.

The User declares under his/her responsibility and guarantees that the data he/she provides to **BABILON SKY S.L.** are true, correct and belong to him/her, and in the case of providing personal data of third parties, the User guarantees to have previously informed them of the corresponding processing, in the terms indicated below, and, in particular and where appropriate, to have obtained their prior express and informed consent to provide them and for the specific purpose of processing our services. In this regard, Users shall be obliged to keep the information and data updated so that it always corresponds to reality. Any false or inaccurate statement that may occur because of the information and data provided, as well as any damage that such information may cause, shall be the direct responsibility of the Users.

Confidentiality and security are fundamental values for **BABILON SKY S.L.** and, consequently, we assume the commitment to guarantee the privacy of the user at all times and not to collect unnecessary information, as well as the commitment to comply with the legislation in force at all times regarding data protection and to respect the values and principles of transparency and loyalty, saving the data and adopting all measures to prevent alteration, loss, unauthorised processing or access, in accordance with the provisions of the regulations in force regarding data protection. Nevertheless, Users are informed that the aforementioned security measures are not unbreakable and/or invulnerable. Below, we provide you with all the necessary information on our Privacy Policy in relation to personal data.

1. DATA CONTROLLER

BABILON SKY S.L.

TAX IDENTIFICATION NUMBER B16709594

C/ San Marius 52 2-1

08022 -Barcelona, Spain

DPO contact: contact@astroflow.app

Hereinafter referred to as "**Astroflow**", "we", "us" or the "Controller".

This Privacy Policy covers all data collected and used by us on the Astroflow mobile application (hereinafter referred to interchangeably as "the Platform" or "App").

If you have any questions or concerns about the way we process and use your personal data or wish to exercise any of the rights described above, please contact contact@astroflow.app.

2. PERSONAL DATA COLLECTED AND PURPOSES FOR WHICH PERSONAL DATA ARE PROCESSED

Personal Data means any information or data that can identify you, either directly or indirectly.

In this regard, personal data collected by **Astroflow** includes:

Registration" Form: If you choose to register with **Astroflow**, **BABILON SKY S.L.** requires to process your personal information to:

Identify you as a user of **Astroflow**. For the aforementioned purposes, **BABILON SKY S.L.** needs to process the personal data provided as a result of the complete registration of the User in one or other ecosystem (e.g. your Name and Surname, email, sex, place of birth, date and time of birth) for its incorporation and association to a "File" of your ownership, which will allow us to identify you during the processes of contracting products and/or services and/or requesting information required by the interested party at all times, as well as to process all this information jointly. If you wish, you can provide us with a photograph of your image that will be used to identify your profile.

To enjoy, receive and participate, through the sending of commercial and advertising communications promoted electronically or otherwise by **BABILON SKY S.L.**, **of the information, contents, products, services, surveys, events, and workshops of these environments, with the corresponding management and personalisation (that is, assessment of their preferences, tastes, and consumption habits)** of the information, content, products, services, surveys, events, and workshops specific to these environments, with the corresponding management and personalisation (i.e., the assessment of your preferences, tastes, and consumption habits) for all of the above.

As a consequence of the above identified, the User is informed that their personal data will be processed in order to adapt the service described above to the tastes, consumption habits and preferences of the User in order to offer them a service of their interest in a personalised manner, adapting our offers and recommendations to said preferences, including by carrying out studies and analyses of said tastes, habits and

consumption preferences, possibly using fragmentation and/or segmentation techniques that allow for the creation of profiles. No automated decisions will be taken based on this commercial profile that affect the fundamental rights and freedoms of Users.

Regarding these electronic commercial communications promoted by **BABILON SKY S.L.** The User is informed that he/she may unsubscribe from these communications at any time by means of the mechanisms provided for this purpose in these communications, or by exercising his/her rights regarding the protection of personal data in accordance with the terms indicated below.

Enjoy the "Push Notifications". Likewise, the User may enjoy and receive push notifications through **Astroflow's** digital environments, which the User may activate and deactivate, at any time, from the corresponding electronic device or browser.

Enjoy and participate in the different personalised remarketing actions generated through Google Ads, Facebook Ads, Twitter Ads, Bing, Ads, LinkedIn, Ads, and Pinterest, Ads.

At **BABILON SKY S.L.** we use Internet advertising to keep our Users up to date with our news, promotions, and discounts, as well as to help them in their search for certain products or services marketed by this party. In this sense, **BABILON SKY S.L.** uses the remarketing functionalities or means of the following social networks and digital platforms, namely Facebook, Inc. ("Facebook"), Google, LLC. ("Google"), Microsoft, Corporation ("Microsoft"), Twitter, Inc. ("Twitter"), LinkedIn Corporation. ("LinkedIn"), as well as Pinterest, Inc. ("Pinterest"), which allow such Users to see targeted advertising from **Astroflow**, i.e., based on the interests of each User, when visiting the social networks Facebook, LinkedIn, Twitter, and Pinterest, as well as Google's own environments (YouTube, Google search, etc.) or Microsoft's own environments (namely the search engine Bing).

Thus, and thanks to this remarketing functionality, it is possible to create specific audiences based on certain categories of personal data owned by our Users, as well as to generate certain digital marketing campaigns aimed at each target audience or audience. For the above, **BABILON SKY S.L.** needs to share with the referred social networks or digital platforms the following categories of personal data owned by our Users, namely, name and surname, age, sex, postal address, email address, telephone number, interests and likes, and this by employing and using technical measures and methodologies that guarantee the confidentiality, integrity and availability of said personal information - such as, for example, the use of cryptographic functions such as hashing-.

This information shared by **BABILON SKY S.L.** will be deleted by each social network or digital platform immediately upon completion of the specific personalised remarketing action, and under no circumstances will it be accessed by any unauthorised third party.

With respect to these remarketing actions promoted by **BABILON SKY S.L.** Users are informed that they may unsubscribe from these actions at any time by exercising their rights regarding the protection of personal data in accordance with the terms indicated below. Notwithstanding the foregoing, our Users are informed that the request to unsubscribe from these remarketing actions implies the cancellation of all digital interactions promoted by **Astroflow** through these digital environments and, consequently, the impossibility to enjoy marketing campaigns generated from techniques or tools such as "similar audiences" or to enjoy the functionalities of these environments.

Enjoy and participate in the different digital marketing actions generated through the LookALike Audiences tool of Google Ads, Facebook Ads, Twitter Ads, Bing Ads, LinkedIn Ads and Pinterest Ads.

Thanks to the custom audience or similar functions provided by Facebook, Google, Microsoft, Twitter, LinkedIn, as well as Pinterest, it is possible to create new target audiences based on specific categories of personal data held by our Users, such as first and last name, gender, age, sex, postal address, e-mail address, telephone number, interests and likes.

In this sense, **BABILON SKY S.L.** needs to share with the referred social networks and/or digital platforms information of our registered Users, of whom we suspect that they belong to the target group to be impacted and who share similar profiles and common characteristics or interests. Subsequently, the corresponding social network or platform will decrypt the data transmitted by **BABILON SKY S.L.** (to the extent that the owner of this information is a member of the social network or platform), and this as part of its relationship with the referred social network or digital platform, in order to show specific advertisements to users of these social networks or platforms with profiles similar to those of the Users of the shared database - without this entailing the disclosure to **BABILON SKY S.L.** of the identity of this new audience.

This information shared by **BABILON SKY S.L.** will be deleted by each social network or digital platform immediately at the end of the campaign, and under no circumstances will it be accessed by any unauthorised third party.

We recommend our Users to review the Privacy Policies of these environments, for further details of these digital marketing actions, available at the following links:

Link to Facebook's Privacy Policy: <https://www.facebook.com/policy.php>

Link to Instagram's Privacy Policy:
<https://es-la.facebook.com/help/instagram/155833707900388>

Link to Pinterest's Privacy Policy:
<https://policy.pinterest.com/es/privacy-policy>

Link to LinkedIn's Privacy Policy:
<https://es.linkedin.com/legal/privacy-policy>

Link to Bing's Privacy Policy:
<https://privacy.microsoft.com/es-es/privacystatement>

Link to Twitter's Privacy Policy:
<https://twitter.com/es/privacy>

With respect to these digital marketing actions promoted by **BABILON SKY S.L.** Users are informed that they may unsubscribe from these actions at any time by exercising their statutory rights. Notwithstanding the above, our Users are informed that the request to unsubscribe from these actions implies the cancellation of all digital interactions promoted by **BABILON SKY S.L.** through these digital environments and, consequently, the impossibility of enjoying remarketing campaigns promoted by this party, as well as the functionalities of these environments.

Enjoy **Astroflow's** own Digital Advertising

Likewise, the User will be able to see **Astroflow** banners and advertisements on other websites, applications, and social networks, managed through cookies or similar technologies, if the User activates through this Platform or the web environment, application or social network that is browsing the functionality for this advertising service. For more information see [Cookies Policy](#).

In this respect, for your security, we have relied on the Apple Store payment system. The subscription to our services will be made through the Apple Store.

App Analytics Processing: Access to the **Astroflow** App requires the processing of your browsing data for analytical and statistical purposes that allow us to understand how Users interact with our App and thus be able to make improvements to it.

Treatment Geolocation App: Regarding geolocation, **Astroflow** informs the User that it is a system whereby the App uses the device's sensors to locate the User at a point on the map. The User expressly and explicitly accepts that the **Astroflow** App has access to this data when installing the App. If the User uses the IOS (Apple) system to download the App, the User may expressly consent to the use of geolocation by the App. If the User uses the Android (Google) system, Google's own system (outside **BABILON SKY S.L.**) informs the User of everything that needs to be accepted at the beginning to install the App, as well as the remaining (optional) functionalities to be enabled by the User in the App, one of them being geolocation. In any case, the User may, at any time, uninstall this geolocation option on their device, following the corresponding instructions or steps provided on their device in this regard - if uninstalled, the App will not be able to use geolocation. The geolocation data is anonymous and is not stored in any way in any **Astroflow** file.

Data collected when you contact us and respond to your queries and/or requests: When you contact us through the means provided on the Platform, we collect any data you voluntarily provide through the contact email, such as your name and email address.

You guarantee that all the data about your identity and legitimacy provided to **BABILON SKY S.L.** in the corresponding forms on the Platform are true, accurate and complete. Likewise, you undertake to keep your data up to date. If you provide any false, inaccurate, or incomplete information or if **BABILON SKY S.L.** considers that there are reasonable grounds to doubt the truthfulness, accuracy and completeness of the same, **BABILON SKY S.L.** may deny you access and present or future use of the Platform or any of its contents and/or services.

Consequences of not providing personal data: the provision of Personal Data requires a minimum age of 18 years or, where appropriate, sufficient legal capacity to contract. The personal data requested are necessary to manage your requests and/or provide you with the services you have expressed interest in, so if you do not provide them, we will not be able to attend to you correctly or provide you with the services you have requested. In any case, we reserve the right to decide whether to include your personal data and other information in our databases.

Similarly, we also collect information that you provide to us indirectly when you create an account and use our services:

Information about how you use our products, the features you use, the actions you take, the people or accounts you interact with and how you interact with them.

Information derived from your use of the Platform in aggregate form to implement improvements to the operation of the Platform and to provide you with recommendations that may be of interest to you.

In addition to the above and in general terms, the personal data provided using the Platform are also necessary for the following purposes:

Identify you as a user and be able to give you access to the different functionalities, products and services that are available to you as a user of the service.

To carry out a correct management of the services and to provide the requested service.

To manage and follow up the contractual and pre-contractual relationship with you.

Provide you with a means of contacting us.

Respond to your questions and/or requests.

To communicate with you by email, regarding new services, updates, or any other matter which we think may be of interest to you.

Improve, develop, and test our Platform.

Protect the rights, property and/or safety of **Astroflow**.

On the other hand, for the proper functioning of the Platform, we use technical and functional cookies to:

- The proper receipt of reminders, technical recommendations, Platform service updates, security alerts and support messages.
- Improve the services to which you might subscribe by studying your user behaviour, to adapt it to your needs and tastes.
- The production of reports and statistics, in a dissociated manner.
- To research, develop and improve services to users or to offer new services, features, and tools.

Depending on the products, services, or functionalities that the User subscribes to or wishes to enjoy at any given time, **BABILON SKY S.L.** will process certain data or others, which in general will be, depending on the case:

Personal identification data (e.g., name and surname, e-mail address, gender, place, date, and time of birth);

Connection and navigation data (in case you interact with us from electronic devices);

Geolocation data (in case they interact with us from their mobile phone);

Commercial and advertising data and information; and,

Data on their tastes and preferences.

3. LEGITIMATION FOR THE PROCESSING OF PERSONAL DATA

The processing of your data is necessary for the execution of the terms regulating the use and enjoyment of the Platform (Astroflow). In any case, you are providing us with your consent by accepting this privacy policy through the consent mechanisms established on the Platform. Similarly, we consider that we have a legitimate interest to carry out the necessary checks to detect and prevent possible fraud when you register on the Platform.

In general terms, the legal basis or legitimacy for the processing of your personal data provided through BABILON SKY S.L. digital environments, will be the one duly identified in our privacy policies, and which may be the express consent requested from the User for each of the purposes of processing, the fulfilment of their high expectations, the execution of pre-contractual measures or of a contract requested by the User, as well as the legitimate interest that binds our relationship.

We find:

Verify the age of the user: Minors are not authorised to register on this Platform or to contract services in this regard. The legitimate basis for the processing of the user's date of birth is the existing legal obligation.

To manage the contracting of services on the Platform: The legitimate basis is the contractual and pre-contractual relationship maintained with you at the time of acceptance of the corresponding Terms and Conditions, as well as your consent to accept this privacy policy through the consent established for this purpose.

User service: we have a legitimate interest in responding to the requests or queries that you submit to us through the various existing means of contact. When you contact us for the management of incidents related to the use of the Platform, the processing is necessary for the execution of the contractual relationship maintained with you.

Where your enquiry relates to the exercise of the rights set out below, or to claims relating to our services, we are entitled to process your data to comply with our legal obligations.

Regarding quality aspects, we have a legitimate interest in analysing the usability of the Platform and the degree of user satisfaction, as the aim is to improve the user experience and offer a higher quality service.

Sending commercial and advertising communications with the Astroflow service to which you have subscribed: The legitimate interest is based on Recital 47 of the General Data Protection Regulation (REGULATION (EU) 2016/679 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL of 27 April 2016).

4. RECIPIENTS OF THE PERSONAL DATA COLLECTED

Your Personal Data may be disclosed to third parties, that is:

To comply with the purposes indicated in this Privacy Policy, it is necessary that, for certain cases and services, we give, where appropriate, access to your personal data to third party recipients, such as other Data Controllers or service providers of **BABILON SKY S.L. (Data Processors of BABILON SKY S.L.)**. (Data Processors of **BABILON SKY S.L.**). Regarding the latter, **BABILON SKY S.L.** has signed the corresponding data processing contracts with each of the suppliers that provide services to **BABILON SKY S.L. with the aim of guaranteeing** that these suppliers will process your data in accordance with the provisions of the legislation in force.

a) Recipients providing a service - "Processors":

Technology service providers;
Electronic signature service provider;
Payment solutions provider;
Providers of customer service-related services;
Providers of communications, marketing and advertising;

b) Recipients providing a service - "Controllers":

Credit institutions, financial institutions;
Fraud detection and prevention entities;

Likewise, some of these Data Processors may be in territories outside the European Economic Area (the countries of the European Union plus Liechtenstein, Iceland, and Norway). To this end, **BABILON SKY S.L.** will adopt the appropriate guarantees and will always safeguard the integrity and confidentiality of your data.

With some of these suppliers, **BABILON SKY S.L.** has signed Standard Contractual Clauses adapted by the European Commission, as a guarantee for those transfers made to countries that do not have an adequacy decision from the European Commission (https://ec.europa.eu/info/law/law-topic/data-protection/data-transfers-outside-eu/model-contracts-transfer-personal-data-third-countries_en).

Apart from these cases, **BABILON SKY S.L.** will not communicate your personal data to third parties, except with express or contractual authorisation or legal obligation or permission.

5. RETENTION OF YOUR PERSONAL DATA

We will only keep your Personal Data for the period that we need for the purpose for which we process it, until your account is deleted, or you request its deletion or for the period of time legally established for this purpose (the period of data retention will be determined by commercial, accounting and tax regulations or other current legislation that establishes a mandatory retention period longer than the above).

The Personal Data obtained through registration to the Platform, those obtained through the e-mail address, will be kept until the service is performed or during the time of attention for the resolution of your query.

We may retain some personal data to comply with our legal or regulatory obligations and to administer our rights (for example, to enforce our claims in court) or for statistical or historical purposes.

In case of inactivity, **BABILON SKY S.L.** will keep the personal data provided by Users for a maximum period of 12 months, without prejudice to the possibility of exercising their rights under the terms indicated below.

6. RIGHTS IN RELATION TO YOUR PERSONAL DATA

The User may exercise, with respect to the data collected in the manner provided for in this Privacy Policy, the rights recognised in the data protection regulations and the following rights: access, rectification, deletion, opposition, limitation, and portability of personal data.

The Users concerned have the right to access their personal data, as well as to request the rectification of inaccurate data or, where appropriate, to request its deletion when, among other reasons, the data is no longer necessary for the purposes for which it was collected.

In certain circumstances, Users may request the limitation of the processing of their data, in which case, **BABILON SKY S.L.** will only keep them for the fulfilment of legal and administrative obligations, defence of our interests and rights, as well as for the exercise or defence of claims, sanctions and responsibilities.

The User shall also have the possibility of revoking consent at any time for any of the processing operations for which consent has been given, without this affecting the lawfulness of the processing based on the consent prior to its withdrawal.

When personal data are rectified or deleted, they must be blocked. Specifically, the blocking of data consists of the "identification and reservation of the data, adopting technical and organisational measures to prevent their processing, including their visualisation, except for making the data available to judges and courts, the Public Prosecutor's Office or the competent Public Administrations, in particular the data protection authorities, for the enforcement of possible liabilities arising from the processing and only for the period of limitation of the same".

The rights may be exercised by the User, duly indicating the reason for his/her request, by sending an e-mail to the address contact@astroflow.app. Requests sent by e-mail must be made from the e-mail address registered by the applicant. In any case, the User, to exercise the aforementioned rights and to offer guarantees of identification of the corresponding applicant, must attach a copy of their National Identity Document or, where applicable, Foreigners' Identification Number, in force, to their request.

Likewise, if you consider that your data have been improperly processed, you have the right to lodge a complaint with the Spanish Data Protection Agency (C/ Jorge Juan, 6. 28001 - Madrid www.aepd.es).

7. SECURITY OF YOUR PERSONAL DATA

To safeguard the security of your personal data, we inform you that we have taken all necessary technical and organisational measures to ensure the security of the personal data provided from alteration, loss and unauthorised processing or access.

This Privacy Policy applies to all staff dealing with **Astroflow** information and must be made available and communicated to all interested parties and is hereby approved and published in Barcelona on 1 March 2022.