

PRIVACY POLICY

Data controller	GESTION OPERATIVA DE PIZZERIAS CARLOS, S.L.
Data Required, Purpose of the Processing and Legal Basis	<p>1) Order processing:</p> <p>Orders placed by telephone:</p> <p><u>Data Required:</u> Telephone number, Delivery address (for home delivery).</p> <p><u>Purpose:</u> Order processing and follow-up. Payment of the order. Responding to claims in response to the order placed.</p> <p><u>Legal basis:</u> contractual relationship for the execution of the order.</p> <p>Order form without registration (as guest):</p> <p><u>Data Required:</u> Name, Surname, Telephone number, Delivery address (for home delivery).</p> <p><u>Purpose:</u> Order management and follow-up. Payment of the order. Responding to claims in response to the order placed.</p> <p><u>Legal basis:</u> contractual relationship for the execution of the order.</p> <p>Order form by means of signing-up as a user:</p> <p><u>Data Required:</u> First name, Surname, Telephone number, E-mail address, Password creation</p> <p><u>Purpose:</u> Management of orders placed through our website or our App, management of claims and complaints.</p> <p><u>Legal basis:</u> contractual relationship for the execution of the order.</p> <p>2) Sending of commercial communications:</p> <p><u>Purpose:</u> Sending of commercial communications, tailored offers.</p> <p><u>Legal basis:</u> Express consent of the data subject by ticking the box accepting commercial communications and tailored offers.</p>

3) Log-in via social networks.

Legal basis: Express consent of the data subject.

4) Usability and quality analysis for service improvement:

Legal basis: Express consent of the data subject.

5) Employment with Pizzerías Carlos:

**Form “Do you want to join us?” “Work with us”
Section:**

Data Required: Name, Surname, Telephone number, E-mail address, CV.

Purpose: To inform candidates of the results of selection process to which they have postulated, as well as of any present future positions in which the candidate's profile may fit.

Legitimising basis: express consent of the candidate.

6) Pizzerías Carlos Franchise:

“Discover this business opportunity by filling in your details” form in the “Become part of the Franchise” section:

Data Required: Name, Surname, E-mail address, Mobile telephone number.

Purpose: Contact with the user in order to attend and manage the request for information regarding the Franchise.

Legal basis: Express consent of the data subject.

Sending to the data subject-user information about “Pizzerías Carlos” Franchises:

Legal basis: Express consent of the data subject by ticking the box accepting commercial communications and tailored offers.

<p>Data recipients</p>	<p>The data provided may be communicated to any company of the GESTION OPERATIVA DE PIZZERIAS CARLOS, S.L. Group, as well as to any third party, when it is necessary to comply with the purposes of the processing. Thus, your personal data may be disclosed:</p> <p>In compliance with legal and contractual requirements, to:</p> <ul style="list-style-type: none"> • Public administrations, in compliance with a legal obligation. • Companies holding a “Pizzería Carlos” Franchise in order to manage the relevant orders. • Certified payment platforms for the provision of payment services and secure electronic transactions. • Employees providing services related to the delivery of orders, insofar as their intervention is necessary for the delivery of orders. <p>Only if the user has given his or her express consent, to:</p> <ul style="list-style-type: none"> • Providers of marketing services, such as newsletters, statistical and/or data analysis.
<p>Recipients of international data transfers</p>	<p>The data provided may be communicated to third parties when it is necessary to fulfil the purposes of the processing.</p>
<p>Rights of data subjects</p>	<p>To access, rectify and erase data, as well as other rights, as explained in the additional information section below.</p>
<p>Additional information</p>	<p>Additional detailed information on Data Protection can be found in the section Detailed Data Protection Information.</p>

Detailed Data Protection Information:

INTRODUCTION

The purpose of this document is to establish the Privacy Policy of the Website and the App owned by GESTION OPERATIVA DE PIZZERÍAS CARLOS, S.L. with Tax Id. Code [CIF]: B-62432067.

This Privacy Policy has been developed taking into account the provisions of Organic Law 3/2018, of 5 December, on the Protection of Personal Data and the Guarantee of Digital Rights (hereinafter, “LOPD GDD”, as per the Spanish acronym), as well as Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons (hereinafter, “GDPR”).

Its purpose is to explain how GESTION OPERATIVA DE PIZZERIAS CARLOS, S.L. collects, uses, shares and protects the personal data provided by the data subject.

It is necessary that the user carefully reads this privacy policy on a regular basis, and whenever personal data is entered, as it may be modified in order to comply with current regulations.

DATA CONTROLLER

GESTION OPERATIVA DE PIZZERIAS CARLOS, S.L.

Corporate address: San Romualdo, nº 26, local B, planta baja, Edificio Astigi (28037 Madrid)

EMAIL: protecciondatos@pizzeriascarlos.es

DATA PROCESSING

We will only ask you, where appropriate, for those personal data that are strictly necessary to identify you and manage your request. Such information will be processed in a fair, lawful and transparent manner. Furthermore, the personal data you provide will be collected for duly stated, explicit and legal purposes and will not be further processed in a way that is incompatible with those purposes. Likewise, such data shall in all cases be adequate, relevant and not excessive in relation to the relevant purposes in each case and shall be updated whenever necessary.

When we ask you to fill in your personal data on our Website or App, to facilitate access to some functionality or service, we will identify some fields as mandatory, as they are data we need to provide you with the relevant service requested. If you decide not to provide us with any of this information, you may not be able to complete your registration as a user or we may not be able to provide the contracted service.

We may also passively collect information by using tracking tools, such as browser cookies or other similar technologies on our Website or in communications we send to you.

Likewise, as the data subject, you will be informed, prior to the collection of your data, of the general provisions regulated by means of this Policy, so that you can give your express,

precise and unequivocal consent to the processing of your data, in accordance with the following aspects:

PURPOSE OF THE PROCESSING:

1) Order management and dealing with complaints and suggestions:

Data of Users who place orders directly from the Pizzerias Carlos Website or App:

- **Management of orders placed through our Platforms:** the personal data collected by GESTION OPERATIVA DE PIZZERIAS CARLOS, S.L. through our Platforms (Website and/or App) will be processed for the purpose of contacting you so as to properly manage orders placed through the Website or App.

The legal basis for this processing purpose arises from the contractual relationship with the Data Subject.

- **Management of registration as a user of the Platforms:** If you decide to register as a user of our Website and/or App, your data will be processed in order to identify you as a user. To the extent that you register on our Website and/or App, we will process your personal data to manage your subscription, which may include sending you personalised information about our products or services by different means (such as e-mail). We may also send you this information via push notifications if you have activated them on your device. This data processing involves the analysis of your user or customer profile to determine what your preferences are and, therefore, which products may be the most suitable for you when it comes to sending you information. For example, based on your shopping and browsing history, we will make suggestions about products that we think may be of interest to you. Remember that you can unsubscribe as a registered user of our Website or our App at any time and at no cost, following the instructions that we provide in each communication.

The legal basis for this processing purpose the arises from the need to process your data for the execution of the terms of these Platforms, i.e., in order for you to register as a user of these Platforms, we need to process your personal data.

- **Order tracking service:** GESTION OPERATIVA DE PIZZERIAS CARLOS, S.L. will process your data to keep you informed, by electronic means, of the status of your order.

The legal basis for this processing purpose arises from the contractual relationship established with you when you contract our services.

- **Management of complaints, claims or suggestions:** We will process your data in order to provide you with the best possible service. We will only process personal data that is strictly necessary to process or solve your request or complaint. If you choose to communicate with Customer Service through the chat service of a social network or other partner, some of your information, such as your name or username, will be imported from your social network or partner account. You should also be aware that the data you enter in this service will be available to your social network or partner and will be subject to their privacy policies. If you contact us regarding the management of incidents related to your orders, the legal basis will

be the execution of the contract itself. Likewise, we understand that there is a legitimate interest in the managing of requests or queries that you may submit to us through any channel, as the processing of your data is also beneficial to you, by guaranteeing the correct management of your queries, suggestions or complaints.

- **Management of the payment of products purchased through the website:** GESTION OPERATIVA DE PIZZERIAS CARLOS, S.L. and its franchisees manage their payments through a gateway that guarantees that transactions are carried out in a secure environment based on the certified PCI DSS (Payment Card Industry Data Security Standard), version 3.0 level 1. Redsys, S.L.

As a user of our platforms, you may request and authorise a card tokenisation process to be carried out. This process ensures that all transactions made with your card through the Website and/or App ensure the encryption of the data from its point of origin to the point of destination. GESTION OPERATIVA DE PIZZERIAS CARLOS, S.L. does not keep any data corresponding your bank card; it only keeps a token number and a transaction number that links your username with the payment data.

The legal basis for this purpose shall also be the performance of the contract with the user.

Data of Users who place orders through Delivery platforms:

- **Process home delivery orders requested by users through aggregators.** If the user orders our products through delivery platforms owned by third parties (such as, for example: Just Eat, Glovo, Uber Eats etc.) GESTION OPERATIVA DE PIZZERIAS CARLOS, S.L. will receive from the Platform, the information strictly necessary for the management of the order (if applicable: full name, telephone, delivery address, details of the order). In this case, the owner of the Platform will be the data controller and GESTION OPERATIVA DE PIZZERÍAS CARLOS, S.L. will act as data processor.

2) Sending of commercial, advertising and marketing communications, in particular the following:

- **Sending of commercial communications:** GESTION OPERATIVA DE PIZZERIAS CARLOS, S.L. will manage the sending of commercial communications regarding its products, promotions and/or services, via e-mail, based on legitimate interest and in accordance with Article 21.2 of Law 34/2002, of 11 July, on information society services and electronic commerce. The legal basis is the consent of the users.
- **Sending of tailored offers:** GESTION OPERATIVA DE PIZZERIAS CARLOS, S.L., will manage the sending, via e-mail, of tailored offers based on the profile of your data, from the study and targeting of personal and commercial information, based on

legitimate interest, by means of the express consent of the data subject by ticking the box accepting the commercial communications.

- **Displaying of advertising on the Internet:** You may see advertising from our website when you browse websites and apps, for example, on social networks. This advertising may be displayed randomly, but it can also be advertising that may be related to your purchase history, preferences and browsing history. We may also use your data to carry out assessment and targeting analysis corresponding to the advertisements we display to users on some partner platforms. To do so, we work with third parties who provide us with the necessary technology (cookies, pixels, etc.) to use these services. Although no personally identifiable information is provided to these partners, we do communicate some unique identifier to them (e.g., advertising identifier associated with the device, cookie identifier, etc.). For further information, refer to our Cookie Policy. You may also reset your advertising identifier or disable ad targeting on your device by modifying your preferences in the settings section of your device.
- **Data enrichment:** Where we obtain your personal data from various sources, we may combine them in certain circumstances in order to improve our understanding of your needs and preferences in relation to our products and services (including for the purposes of analytics, usage profiling, marketing research, quality surveys and improving interaction with our customers). We refer, for example, to automatically collected information (such as IP addresses, MAC addresses or metadata) that we may link to information you have provided to us directly through your activity on the Website or App.
- **Promotional activities** (e.g. for running competitions or prize draws). By participating in any promotional action, through our platforms or social media profiles, you authorise us to process the data you provide us with pursuant to each promotional action, as well as to communicate such data through various media such as social networks or on the website itself. Regarding each promotional action in which you participate the legal bases will be available to you where we will provide you with more detailed information about the processing of your data. The legal basis for processing your data for marketing purposes is the express consent you give us, for example: when you agree to receive tailored information through different channels, when you give your consent by setting cookies or privacy settings on your device, or when you accept the legal basis for participating in an action on our social media channels.
- **Offering tailored services or personalized information,** whether on our Platform or on third party platforms, as well as while carrying out data enrichment activities, we consider that we have a legitimate interest in profiling the information we have about you (such as your browsing preferences or purchase history) and the personal data you have provided to us, as we understand that the processing of such data is also beneficial to you because it allows to improve your user experience and access information in accordance with your preferences.

3) Login via social networks:

You can log in through your account in social networks (Instagram or Facebook), in this case we can provide those social networks with which we collaborate with certain information so that they can show you advertisements of our brand and, in general, offer you or other similar users, advertising taking into account your profile on these social networks. If you want information about how your data is used and how ads work on these social networks, we recommend that you review the information about your privacy options on the social networks in which you participate.

The purposes for which GESTION OPERATIVA DE PIZZERIAS CARLOS, S.L. may process your data, based on legitimate interest, are the management of your relationship as a User of the Website, as well as the various consents provided by the user when registering thereon, as well as those that may be applied in relation to the privacy policies of the social networks with which they interact.

4) Usability and quality analysis for service improvement:

The browsing data from our Website may be used for analytical and statistical purposes that allow us to know how users interact with our Platform, as well as the actions that can be carried out from other websites or apps. In this case we consider that there is a legitimate interest in analysing the usability of our Website and our App, and the degree of user satisfaction, as we understand that the processing of such data is also beneficial to users as the purpose is to improve the user experience and offer a higher quality service.

5) Employment with Pizzerías Carlos:

In case the user sends his/her CV through the form ***Would you like to work with us?*** We inform you that your data will be processed in order to make you part of the recruiting processes that may take place, carrying out an analysis of the applicant's profile in order to select the best candidate for the vacant position.

6) Information request for the opening of a Franchise and the sending of commercial communications on Franchises:

GESTION OPERATIVA DE PIZZERIAS CARLOS, S.L. will manage the request for information from Data Subjects that may be interested in the opening of a Franchise when they provide their data through the Form included in the "Franchise" section of our Website. In this case, the legal basis is based on the prior express and unequivocal consent of the data subject, through the inclusion of informed consent clauses, prior to the processing of personal data. Likewise, as long as the Data Subject has ticked the corresponding box, GESTION OPERATIVA DE PIZZERIAS CARLOS, S.L. may send commercial communications related to the "Pizzerías Carlos" franchises.

TRANSFERS AND RECIPIENTS:

GESTION OPERATIVA DE PIZZERIAS CARLOS, S.L. informs that, as owner of the brand "*Pizzerías Carlos, la pizza que recordabas*" can make the relevant transfers to other franchised companies of this brand for management purposes by the franchisee. Therefore, if the Data Subject places an order through the Website or the App with a

franchised establishment, the personal data provided will be communicated by GESTION OPERATIVA DE PIZZERIAS CARLOS, S.L. to the aforementioned establishment for the purpose of managing and collecting payment corresponding to the order requested, as well as managing suggestions and/or complaints relating thereto and sending commercial communications or tailored offers.

On the other hand, in order to carry out all the purposes described above, GESTION OPERATIVA DE PIZZERIAS CARLOS, S.L. may hire third-party service providers who may have access to the personal data as a consequence of the execution of the contracted services (financial entities, home delivery operators, technological and analytical service providers, marketing- and advertising-related service providers and collaborators, such as advertising agencies, advertising partners or social networks which, in certain cases, may act as joint controllers). In any case, GESTION OPERATIVA DE PIZZERIAS CARLOS, S.L. follows strict criteria for the selection of these third parties in order to comply with its data protection obligations and signs the corresponding data protection agreements with them, by virtue of which these third parties undertake to comply with their data protection obligations, and specifically, to comply with the relevant legal, technical and organisational measures, to process personal data for the agreed purposes, and to prohibit the processing of such personal data for other purposes or to transfer the data to third parties.

For efficiency purposes, some of the above-mentioned service providers are located in territories outside the European Economic Area which do not provide a level of data protection equivalent to that of the European Union. In such cases, we inform you that we transfer your data with adequate safeguards and always maintain the security of your data, as we use the most appropriate tools for international data transfer, such as Standard Contractual Clauses or any other relevant supplementary measures. You can consult the contents of the Standard Contractual Clauses in the following link: https://commission.europa.eu/law/law-topic/data-protection_en

Your data may also be transferred to the Public Administrations and the Administration of Justice, in compliance with a legal obligation to which GESTION OPERATIVA DE PIZZERIAS CARLOS, S.L. may be subject.

ORIGIN:

The personal data that we process are the data that you provide us as a Customer and user of our Platforms. However, under certain exceptions, data may be collected through third parties, entities or different services, which, if applicable, will be communicated to you through the informed consent clauses contained in the different information collection channels and within a reasonable period of time.

*Data corresponding to minors: GESTION OPERATIVA DE PIZZERIAS CARLOS, S.L. will not collect or process personal data of minors under 16 years of age, without fully complying with the requirements established in the applicable data protection regulations and EU Regulation 679/2016. In the case of minors under the age of 16, processing shall only be considered lawful if the holder of parental authority or guardianship over the minor gives

the relevant consent. For further information, please refer to the General Business Terms and Conditions on our website.

STORAGE PERIODS:

Your personal data will be kept for as long as you do not request their erasure or cancellation and as long as they are adequate, relevant and limited to what is necessary for the purpose for which they were requested, so that, once the purpose has been fulfilled, the data will be cancelled. Said cancellation will give rise to the blocking of the data, which will only be kept at the disposal of the Public Administrations, Judges and Courts in order to meet any possible liabilities arising from the processing during the period of limitation of the latter. Upon expiry of that period, information shall be destroyed.

Uninstalling the App does not lead to the erasure of your personal data, so in case you want us to erase your data it is important that you delete your account from your profile or request your right to data erasure, as described below:

YOUR RIGHTS:

Data protection regulations grant you a number of rights as data subject, user of the Website, the App, or user of profiles on the social networks of GESTION OPERATIVA DE PIZZERIAS CARLOS, S.L.

These rights are as follows:

1) Right to access. You may contact us to find out whether your data are being processed and, if so, to obtain the following information: a copy of the personal data being processed, the purpose of the processing, the category of data being processed, the recipients or categories of recipients, the storage period, the exercise of the rights you have, the right to lodge a complaint with a supervisory authority, the origin of the data, and the existence of automated decisions, including profiling.

2) Right to rectification. You may ask us to rectify your personal data we hold that may be inaccurate and to complete personal data that may be incomplete.

3) Right to object. You may object to our processing of your personal data in the following cases:

- When they are processed on the basis of a public interest mission or legitimate interest.
- Where the processing is for the purpose of direct marketing, including profiling.

4) Right to erasure. You also have the right to obtain the erasure of data in the following circumstances:

- When the data are no longer necessary for the purpose for which they were collected.
- When you withdraw your consent, provided that the processing is not based on another legal basis.

- When you object to the processing.
- When your personal data have been unlawfully processed.
- When they must be deleted in compliance with a legal obligation.
- Where your data have been obtained in connection with the provision of information society services pursuant to Article 8 of the GDPR.

5) Right to restriction of processing: you may request a restriction to the processing while we process your request or contest the accuracy of your personal information or the lawfulness of the processing of your personal information and our legitimate interests regarding the processing of such information, or if you need the personal information for litigation purposes.

6) Right to portability: The right to request the portability of your data so that they are sent directly to the entity designated by you in a structured, commonly used, machine-readable and interoperable format, provided that the processing is legitimate on the basis of consent or in the context of the performance of a contract and provided that it is technically possible.

To exercise these rights, you may contact GESTION OPERATIVA DE PIZZERIAS CARLOS, S.L. by writing to the following e-mail address: protecciondatos@pizzeriascarlos.es, stating in the subject the right that you wish to exercise.

Likewise, you should take into account that, as the holder of the data, you may, at any time, contact the Spanish Data Protection Agency, located at C/ Jorge Juan, no. 6, C.P. 28001, Madrid.

SECURITY:

The security measures adopted by GESTION OPERATIVA DE PIZZERIAS CARLOS, S.L. as well as by the rest of the franchisees of the chain, are those required in accordance with the provisions of Article 32 of the GDPR. In this sense, GESTION OPERATIVA DE PIZZERIAS CARLOS, S.L., taking into account the state of the art, the costs of implementation and the nature, scope, context and purposes of the processing, as well as the risks of varying likelihood and severity for the rights and freedoms of natural persons, has established the appropriate technical and organisational measures to ensure the level of security appropriate to the existing risk.

In any case, GESTION OPERATIVA DE PIZZERIAS CARLOS, S.L., has implemented sufficient mechanisms to:

- Ensure the ongoing confidentiality, integrity, availability and resilience of processing systems and services.
- Restore the availability and rapid access to the personal data in a quick manner, in the event of a physical or technical incident.
- Regularly verify, assess and evaluate the efficiency of technical and organisational measures.
- Pseudonymising and encrypting personal data, when appropriate.

BROWSING INFORMATION:

In relation to the browsing information that may be processed through the relevant Platform (Website or App), we inform you that we use cookies and similar devices to facilitate your browsing, to know how you interact with us and, in certain cases, to be able to show you advertising based on your browsing habits. Please see our Cookie Policy for more details on the cookies and similar devices we use, their purpose and how to manage your preferences, as well as any other information of interest.

CHANGES TO OUR PRIVACY POLICY:

We may modify or update this Privacy Policy to reflect changes in our business and practices, so you should consult it periodically.

When we materially change the Policy, we will state this by updating the “LAST REVIEWED” date at the end of this document.

LATEST REVIEW OF THE PRIVACY POLICY: 27/05/2025