

## PRIVACY POLICY

### BASIC INFORMATION ON DATA PROTECTION POLICY

Controller	TRITIUM SOFTWARE, S.L.(B-64685092) C/Josep Irla i Bosch 1-3, 08034 Barcelona Telephone: +34 931 173 886 <a href="mailto:gdpr@forcemanager.net">gdpr@forcemanager.net</a> <a href="http://www.forcemanager.com">www.forcemanager.com</a>
Purposes	<ol style="list-style-type: none"><li>1. Management of the contractual relationship and provision of services hired</li><li>2. Commercial information</li><li>3. Management of job offers and applications</li><li>4. Organisation and management of corporate events</li><li>5. Compliance with legal, accounting, tax and administrative obligations</li></ol>
Legitimation	Data Subject Consent Legitimate interest (Performance of the contract or management of the Whistleblowing channel) Specific law or regulation
Addressees	ForceManager Group Companies (Annex I) Public Authorities for the fulfilment of legal obligations Suppliers necessary for the provision of Services: <a href="#">List of subcontractors</a>
Rights of data subjects	Access, rectification, erasure, restriction, opposition and/or portability, as detailed in the additional information
Additional Information	Additional and detailed information on Data Protection can be found on our website: <a href="https://www.forcemanager.com/es/info/privacidad/">https://www.forcemanager.com/es/info/privacidad/</a>

### ADDITIONAL INFORMATION ON DATA PROTECTION POLICY

**Data collection and processing:** Prior to the collection of their personal data (hereinafter "Data") and in accordance with the principles of legality, loyalty and transparency, the owner of the Data (hereinafter the "Data Subject") is informed of the existence of this Privacy Policy so that they can give their explicit consent in a free, specific, informed and unequivocal manner.

This Privacy Policy will be applicable to the use of the services offered by TRITIUM SOFTWARE, S.L. in relation to the ForceManager Product (hereinafter "Services"), regardless of the means of access. It shall not apply in relation to personal data collected by the Data Subject in its capacity as a Client and/or User in the use of the aforementioned Services, the latter being the controller in this case for the aforementioned data and having to apply its own Privacy Policy.

Personal Data will only be requested if strictly necessary for the fulfilment of the purposes for which they are collected, and may not be used for other purposes.

The Data shall be adequate, relevant and not excessive in relation to each of the purposes, and they shall be updated whenever necessary. They will in all cases be processed in a fair, lawful and transparent manner.

**Acceptance:** By accepting this Privacy Policy, the Data Subject expressly accepts and consents to the collection, use and, where appropriate, transfer of their Data under the terms indicated below.

**Possibility of withdrawing consent:** The Data Subject has the right to withdraw consent at any time by contacting [gdpr@forcemanager.net](mailto:gdpr@forcemanager.net), without this affecting the lawfulness of the processing based on the consent prior to its withdrawal.

**Possibility of complaining to the supervisory authority, the Spanish Data Protection Agency (AGPD):** The Data Subject may address any claims arising from the processing of their Personal Data to the Spanish Data Protection Agency ([www.agpd.es](http://www.agpd.es)).

**Data Controller:** The Controller of the Data identified in this Privacy Policy is:

TRITIUM SOFTWARE, S.L. (dba ForceManager)  
C/Josep Irla i Bosch 1-3, 08034 Barcelona  
B-64685092  
Telephone: +34 931 173 886  
E-mail: [gdpr@forcemanager.net](mailto:gdpr@forcemanager.net)  
[www.forcemanager.com](http://www.forcemanager.com)

**Source of Data:** As a general rule, Personal Data are always collected directly from the Data Subject when they:

- use the Services
- register for a Free Trial
- purchase the ForceManager Product and/or Services
- register for a job offer
- register to attend a corporate event
- Make a complaint or report an irregularity in the Whistleblowing Channel

However, in certain exceptions, the Data may be collected through third parties, entities or services other than the Data Subject. With regard to this point, it will be communicated to the Data Subject through the informed consent clauses within a reasonable period of time, once the Data have been obtained, and within 1 (one) month at the latest.

**Purposes of processing:** When we process usage and analytical information, as well as some statistical and aggregate data derived from Client and/or User's Personal Data for the improvement and further development of our products and/or services, we do so anonymously.

In the event that the Client acquires or wishes to use any of the features and/or integrations offered by the ForceManager Product, the Client must accept the respective Terms and Conditions and Privacy Policy of the providers of these features and/or integrations, and the Personal Data will be processed for the purposes established in these policies.

The specific purposes for which TRITIUM SOFTWARE, S.L. collects personal data are indicated in the informative clauses for each of the different means of data collection (online forms, paper forms, phrases or posters and informative notes).

Data are collected for the following purposes:

1. *Managing the contractual relationship with the Data Subject and provision of the services hired*
  - Managing the maintenance of the relationship established with the Data Subject in their capacity as a Client and/or User and compliance with the legal, accounting, tax and administrative obligations derived from this purchase
  - Managing the services hired, including the management, administration, documentation, invoicing, provision, monitoring, expansion and improvement of the content, information and services offered by

TRITIUM SOFTWARE, S.L. and/or by other companies in the ForceManager Group to which TRITIUM SOFTWARE, S.L. belongs.

- Enhancement of the ForceManager Product and/or services, which may include Artificial Intelligence
  - Design of new services and/or content, which may include Artificial Intelligence
  - Sending updates of Services and any technical and operational information that may be required regarding the Licences and/or the Services hired and/or regarding activities related to them
  - Analysis for statistical purposes in connection with our services
  - Payment of licences and/or services by credit card
2. *Commercial information*
- Sending commercial information about news and activities related to the Licences and/or the Services hired
  - Sending information, by any means, about new products or services, promotions, news and events or requests for demonstrations
3. *Management of job offers and applications*
- Management and processing of vacancies and job applications
  - Carrying out selection processes for positions available in any of the companies in the ForceManager Group to which TRITIUM SOFTWARE, S.L. belongs.
  - Other purposes related to dealing with offers posted and applications received
4. *Organisation and management of corporate events*
- Organisation and management of events and functions for which the Data Subject registers
  - Publication in the media, on our website and/or on Social Media of photographs and images of Data Subjects taken at events
  - Other purposes related to the management and organisation of corporate events and functions
5. *Compliance with legal, accounting, tax and administrative obligations*

**Data categories and retention periods:** TRITIUM SOFTWARE, S.L. will only collect the Data necessary to achieve the purposes for which they are collected and it will keep them for as long as they are necessary to fulfil these purposes or as long as the Data Subject does not exercise the rights of deletion, cancellation and/or restriction of the processing of their Data. The Data will be subsequently cancelled, without any use being made of them, remaining blocked and at the disposal of the Public Authorities, Judges and Courts to meet any possible liabilities arising from the processing until legal obligations based on current regulations are met regarding retention. Once this period has expired, the Data shall be destroyed.

Notwithstanding the above, TRITIUM SOFTWARE, S.L. may keep anonymised information and data relating to the use of the Services, with the aim of improving their quality.

Purpose	Category of data processed	Retention period
Management of the contractual relationship and provision of services hired	<ul style="list-style-type: none"> <li>- Client and User Data: Contact and billing information (name of contact person, company name, address, e-mail, telephone, ...)</li> <li>- Navigation data: Information based on the commercial activity of the Client and/or User for the purpose of supplying certain features of the application, if these are activated (geolocation; date, call duration and speakers; communications sent or received; voice commands sent; photographs; details of video calls (time, duration and content) regardless of whether the camera option has been activated)</li> </ul> <p>Information about your session with the help of Cookies (for more information, see</p>	The Data shall be kept for the duration of the Services and, once the Services have been terminated, for a period of thirty (30) days.

	<p><a href="https://www.forcemanager.com/es/info/cookies/">https://www.forcemanager.com/es/info/cookies/</a>).</p> <ul style="list-style-type: none"> <li>- Third-party data: third-party information collected by the Client and/or User in using the ForceManager Product. The Client will be responsible for this data and TRITIUM SOFTWARE, S.L. will process this data on behalf of the Client as the processor.</li> </ul>	
Commercial information	<ul style="list-style-type: none"> <li>- Client and/or User contact details (identification, postal and/or e-mail addresses)</li> </ul>	<p>The Data shall be kept for as long as the Data Subject does not request their deletion.</p> <p>The Data Subject may request the deletion of their Data by post to TRITIUM SOFTWARE, S.L., calle Josep Irla i Bosch 1-3 - 08034 Barcelona or by email to <a href="mailto:gdp@forcemanager.net">gdp@forcemanager.net</a>.</p>
Management of job offers and applications	<ul style="list-style-type: none"> <li>- Candidates' contact details (identification, postal and/or e-mail addresses, academic and employment history)</li> <li>- Other data necessary to comply with legal obligations</li> </ul> <p>TRITIUM SOFTWARE, S.L. will never ask you to provide information that is not necessary for a selection process. In particular, we will never collect information about your racial or ethnic origin, political opinions, religious beliefs, trade union membership or sex life.</p>	<p>The Data will be kept indefinitely from the end of the selection process corresponding to the job offer for which the Data is provided or from the time the Data is entered at <a href="https://forcemanager.bamboohr.com/jobs/">https://forcemanager.bamboohr.com/jobs/</a>, and as long as the Data Subject does not request the deletion of the Data.</p>
Organisation and management of corporate events	<ul style="list-style-type: none"> <li>- Registered participants' data (identification, postal and/or e-mail addresses, photographs and images taken during their participation in the event)</li> </ul>	<p>The Data will be kept until the end of the event and, once the event has ended, for as long as the Data Subject does not request its deletion.</p>
Compliance with legal, accounting, tax and administrative obligations	<ul style="list-style-type: none"> <li>- Accounting and tax data</li> </ul>	<p>The Data will be retained until the end of any liability for legal, accounting, tax and administrative obligations and we will restrict access to specific individuals or functions.</p>

**Legitimation for the processing of the Data:** As a general rule, before processing personal data, TRITIUM SOFTWARE, S.L. obtains the explicit and unequivocal consent of the owner of the data, by signing an agreement or accepting the purchase order, or by including informed consent clauses in the different information collection systems. The Data Subject is responsible for the legality and veracity of the Data provided.

Purpose	Legitimation
Management of the contractual relationship and provision of services hired	Legitimate interest of TRITIUM SOFTWARE, S.L. (Execution of the contract or management of the complaint channel) Data Subject consent (in the case of accessing the website/app for the first time, when requesting a free trial or when activating some of the features or integrations of the ForceManager Product)
Commercial information	Data Subject Consent
Management of job offers and applications	Data Subject Consent
Organisation and management of corporate events	Data Subject Consent
Compliance with legal, accounting, tax and administrative obligations	Specific law or regulation

**Transfer of data to third parties and international data transfers:** To the extent necessary for the purposes described above, the Data provided by the Data Subject may be transferred to the entities listed below, and with which TRITIUM SOFTWARE, S.L. has signed the corresponding data processing agreements in order to ensure the security of Data in accordance with the requirements and standards demanded by European regulations on the protection of personal data.

In the case of processors located outside the EU, standard data protection clauses adopted by the European Commission (Commission Implementing Decision (EU) 2021/915) have been used.

By accepting this Privacy Policy, the Data Subject consents to such transfer to:

- Any of the companies in the ForceManager Group to which TRITIUM SOFTWARE, S.L. belongs (Annex 1)
- Providers of necessary infrastructure services or ForceManager Product features and integrations [[Subcontractors List](#)]. This list of suppliers will be updated on a regular basis.
- When it is necessary to comply with legal obligations: Public Authorities
- In the case of corporate events: sponsors, the media and/or social networks indicated in the data collection form

**Security** TRITIUM SOFTWARE, S.L. is aware of the importance and confidentiality of your personal data and therefore takes the security measures required by current legislation on data protection, including the General Data Protection Regulation (GDPR), in order to ensure that this information is processed, stored and maintained securely against loss of data and unauthorised access.

In this respect, TRITIUM SOFTWARE, S.L., taking into account the state of the art, the application costs 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 the event of a security incident that poses a risk to the rights and freedoms of the data subject, TRITIUM SOFTWARE, S.L. will notify the data subject immediately and, at the latest, within 72 (seventy-two) hours of becoming aware of the incident.

TRITIUM SOFTWARE, S.L. has in any case implemented sufficient mechanisms to:

- a) Ensure the continued confidentiality, integrity, availability and resilience of processing systems and services.
- b) Restore availability and access to Personal Data quickly in the event of a physical or technical incident.
- c) Regularly verify, evaluate and assess the effectiveness of the technical and organisational measures implemented to ensure the security of the processing.

d) Pseudonymise and encrypt Personal Data, where appropriate.

Our Security Policy gives a detailed description of our technical, administrative and organisational security measures. For more information, please go to <https://www.forcemanager.com/data-security/>

**Data Subjects' Rights:** Data Subjects, as owners of their Personal Data, have the following rights:

1. Right to request access to their Personal Data.
2. Right to rectify erroneous or inaccurate Data.
3. Right to erasure of their Personal Data
4. Right to object to the processing of their Personal Data.
5. Right to request a restriction of their Personal Data processing
6. Right to portability of their Personal Data (if applicable).
7. The right to transparency in the information received.
8. The right not to be subject to automated individual decisions.
9. The right to cancel consent given for the processing of their Personal Data.
10. Right to the retention of their Data.
11. The right to lodge complaints with the Spanish Data Protection Agency when they consider that their rights have not been respected.

The data subject may exercise their personal data protection rights at any time by sending a letter to TRITIUM SOFTWARE, S.L., calle Josep Irla i Bosch 1-3, 08034, Barcelona, or via an email to [gdpr@forcemanager.net](mailto:gdpr@forcemanager.net).

It is possible that, in order to prove the applicant's identity, an identification document (ID card, passport or equivalent) may be required.

Models, forms and more information about your rights are also available on the website of the Spanish Data Protection Agency: [www.agpd.es](http://www.agpd.es).

**Changes to this Privacy Policy:** TRITIUM SOFTWARE, S.L. reserves the right to modify this Privacy Policy at any time and, when required by law, we will notify you of any changes to this Privacy Policy. In the event that we make a material change, we will notify you before the change becomes effective.

ANNEX 1

<b>FORCEMANAGER GROUP</b>	
<b>COMPANY NAME</b>	<b>ADDRESS</b>
<b>TRITIUM SOFTWARE, S.L.</b>	Carrer de Josep Irla i Bosch, 1-3, 2nd floor 08034 Barcelona Spain
<b>FORCEMANAGER LTD.</b>	167-169 Great Portland Street, 5th Floor London W1W 5PF United Kingdom
<b>ForceManager Colombia, S.A.S.</b>	Carrera 21# 134-61 Flat 805 Bogotá Colombia
<b>FORCEMANAGER, S.R.L. DE C.V.</b>	Av. Cafetales 1702, Int.302 Hacienda de Coyoacán 04970 Mexico City Mexico
<b>FORCEMANAGER INC.</b>	90 Canal St. Fl <sup>4th</sup> . Boston, MA 02114-2018 United States
<b>SELLF, S.R.L.</b>	Via Sile 41 31056 Roncade (TV) Italy