

PRIVACY AND COOKIES POLICY

www.vicobook.com

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STORY BUILD LTD

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Company Number SC659718, Companies House Sic Codes 58110 85520*

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I. PRIVACY POLICY

1. INTRODUCTION AND APPLICABLE LAW

Protecting your privacy and your personal data is of vital importance to us. We take the processing of personal data very seriously and therefore use your personal data strictly within the limits set out in Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of individuals with regard to the processing of personal data and on the free movement of such data (hereinafter, "**EU GDPR**"), the United Kingdom's General Data Protection Regulation (hereinafter, "**UK GDPR**") and Spain's Organic Law 3/2018 of 5 December on the Protection of Personal Data and Guarantee of Digital Rights, as well as all other applicable international legislation.

On the basis of the above and by means of the following privacy policy we inform you about the nature, scope and purposes of the collection of your personal data by our company as a user of our platform (hereinafter, the "**User**" or "**Users**").

The first thing you should know is who we are. **STORY BUILD LTD**, is a company based in the United Kingdom, dedicated to the cultural-literary field, which through its digital platform **Vicobook** aims to encourage writing and reading by promoting creativity and teamwork in an inclusive and multi-literate environment, and offers its users (universities, schools, academies, libraries, writing and reading clubs, amateur and professional writers, individuals, etc.) a collaborative tool for literary co-creation, divided into four spaces:

- A group work space (Cowork) that allows its users to group together in co-creation teams where they adopt one or more roles (director, scriptwriter, narrator, illustrator, etc.) or one or more characters (main and secondary), for the creation of works in any genre and category, with various resources, functionalities and communication systems, such as, among others, a chat for authors, to organise and coordinate the development of the works.

- A collection space (Coread) that allows its users to follow the co-creation of works live, and also has resources and communication systems, such as, for example, a chat for readers, which allows them to interact with each other and with the authors, providing comments and suggestions on the development of the works.

- A Library where authors can publish their finished works, for private consumption or for the Vicobook community, as they wish.

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- A cultural and literary social network (Home) where users can interact, share content, create debate, generate synergies, promote the creation of groups and organise events, making their creative experience visible and widening their circle of influence.

Both the EU GDPR and the UK GDPR oblige the Vicobook Platform in terms of the specific requirements for companies and organisations regarding the collection, storage and management of personal data, and this in its dual capacity as a European organisation based outside the EU, i.e. the United Kingdom, but whose activity is also aimed at citizens residing in the EU, the rest of the European Economic Area (EEA) and other countries.

In accordance with the requirements of the applicable law, we undertake to process personal data in accordance with the principle of proactive accountability as set out in Article 5(2) of the EU Data Protection Regulation (EU GDPR) and to tailor it to your risk factors.

2. DATA CONTROLLER

Identity: STORY BUILD LTD

Company number (UK): SC659718

TIN (UK): 40780987

ICO Registry Reference (UK): ZB387243

Registration date: 7 September 2022

Postal address: 10 GENF Main Street, Glasgow - Scotland G72 JH

Telephone: +34 638174527

Data Protection Contact: Vinyet Miró Pujadas

3. CONFIDENTIALITY AND ACCURACY OF DATA PROCESSING

The data we collect will be processed with the utmost confidentiality and secrecy. We assume that the information you provide is true, accurate and complete and we will not be liable for any damages or losses resulting from the falsity, inaccuracy or incompleteness of the data.

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4. WHAT PERSONAL DATA WE PROCESS, FOR WHAT PURPOSE AND FOR WHAT REASON

Below, we provide information on the purposes for which the User's personal data will be processed, indicating which data will be processed (type of data) and the basis on which we do so (legal basis).

REGISTRATION AND USER MANAGEMENT THROUGH THE VICOBBOOK PLATFORM		
DATA TYPOLOGY	PURPOSES	LEGITIMACY
<ul style="list-style-type: none"> ▪ Identifying data: name, surname, age, country of residence, country and date of birth, User ID. ▪ Contact details: e-mail. ▪ Invoicing data. ▪ User profile image (if you decide to upload it). ▪ Projects carried out on the Vicobook-Platform. ▪ Publication data and information on publications made in the different publication, communication and/or notification spaces enabled in Vicobook. ▪ Access credentials. 	<p>Processing the registration of Users on the Vicobook Platform, as well as the provision of the services offered to the User through the Vicobook Platform in its different modalities; including, where appropriate, data modifications and account deletion, and this in relation to the provision of services from STORY BUILD to Users. As well as the following services, among others:</p> <ul style="list-style-type: none"> -Group reading space; -Literary creation and co-creation platform; -Social networking; -Library; -Interaction between users (Chat) and chat between co-writers and collectors; - M a n a g e m e n t , subscription and charging 	<p>This processing is necessary to comply with the contractual or pre-contractual obligations set out in the Terms and Conditions of Use of the Vicobook Platform and accepted by you as a User.</p>
ATTENTION TO QUERIES, REQUESTS AND/OR COMPLAINTS		

DATA TYPOLOGY	PURPOSES	LEGITIMACY
<ul style="list-style-type: none"> Identification data: name, surname, user. Contact details: e-mail. Data related to the request or application provided by the User. 	Processing of data for the purpose of dealing with your query, complaints or request when you contact us.	<p>This processing is based on the <u>legal obligation</u> arising from consumer and user protection regulations.</p> <p>In the case of other queries, requests and complaints, the processing is based on the <u>need to comply with the contractual or pre-contractual obligations</u> established in the Terms and Conditions of Use of the Vicobook Platform, and</p>

SENDING PUSH/E-MAIL NOTIFICATIONS

DATA TYPOLOGY	PURPOSES	LEGITIMACY
<ul style="list-style-type: none"> User Data on the Vicobook Platform. Contact details: e-mail. 	Send you notifications related to your use, functionalities, services, settings and other information on the Vicobook Platform, either on your mobile device or through your e-mail.	These notifications will be necessary to comply with the <u>contractual or pre-contractual obligations established</u> in the Terms and Conditions of Use of the Vicobook Platform and accepted by you as a User.

SENDING COMMERCIAL COMMUNICATIONS

DATA TYPOLOGY	PURPOSES	LEGITIMACY
<ul style="list-style-type: none"> Identification data: first name, surname. Contact details: e-mail, postal address, telephone number. Areas of interest: preferences in the use of the Vicobook Platform 	Sending commercial communications about STORY BUILD products, services and news, based on your interests (See section "User Segmentation").	In order to send commercial communications, we must have your <u>express consent</u> granted by ticking the box provided for this purpose. You may withdraw your consent at any time as indicated in the "Management of your rights" section of this privacy policy.

PROFILING

DATA TYPOLOGY	PURPOSES	LEGITIMACY
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<ul style="list-style-type: none"> ■ Identification data: name, surname, User ID, sex. ■ Contact details: e-mail, postal code. ■ Navigation data. ■ Preferences and needs on issues related to the Vicobook Platform. ■ Navigation preferences and interests. 	<p>Creation of profiles based on the tastes and interests of the User based on an analysis of the services received or shown interest in order to adjust our promotional actions, such as sending commercial communications.</p> <p>This profile will be drawn up from internal sources according to information from your browsing, information obtained concerning your needs or preferences expressed by you as a User during your relationship with STORY BUILD, the activities in which you participate and your various interactions and exchanges of information with our Platform.</p>	<p>The <u>legitimate interest</u> of STORY BUILD, in accordance with the provisions of the applicable data protection regulations, as it is based on internal sources and is a low-grade profiling.</p>
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PERSONALISATION AND SEGMENTATION OF THE VICOBOK PLATFORM		
DATA TYPOLOGY	PURPOSES	LEGITIMACY

<ul style="list-style-type: none"> ■ Navigation data. ■ Technical data. ■ IP address. 	<p>To personalise and segment the content and functionalities of the Vicobook Platform through the use of cookies or similar technologies when these are consented to by the User through the corresponding banner.</p>	<p>The <u>express consent</u> you give us through the cookie banner made available to you by STORY BUILD.</p> <p>You may withdraw your consent at any time in accordance with the information provided in our Cookie Policy.</p> <p>However, STORY BUILD will process information obtained through cookies or similar technologies without your consent provided that it is anonymous information that does not contain any data that could identify you.</p>
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FRAUD PREVENTION

DATA TYPOLOGY	PURPOSES	LEGITIMACY
<ul style="list-style-type: none"> ■ Identification data: name, surname, residence, country. ■ Contact details: e-mail. ■ Billing data. 	<p>Process and/or communicate your personal data to third party payment service providers to prevent, investigate and/or detect fraud.</p>	<p>The <u>legitimate interest</u> of STORY BUILD and its payment service providers in preventing and counteracting fraud.</p>

COMPLIANCE WITH LEGAL OBLIGATIONS

DATA TYPOLOGY	PURPOSES	LEGITIMACY
<p>Those personal data that the User provides us with and that are generated in the course of the relationship.</p>	<p>We process your personal data <u>in order to comply with our legal obligations regarding compliance with personal data protection regulations, among others.</u></p>	<p>The processing of your personal data is necessary to <u>comply with our legal, regulatory, accounting, tax and other obligations.</u></p>

STATISTICAL STUDIES FOR THE IMPROVEMENT OF THE VOCOBOOK PLATFORM

DATA TYPOLOGY	PURPOSES	LEGITIMACY
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<ul style="list-style-type: none"> ■ Navigation data. ■ Technical data. ■ IP address. 	<p>Conduct statistical studies on the use of the Vicobook Platform in order to improve it.</p>	<p>STORY BUILD's <u>legitimate interest in the continuous improvement of its platform.</u></p>
COMPETITIONS, PRIZE DRAWS AND PROMOTIONS		
DATA TYPOLOGY	PURPOSES	LEGITIMACY
<ul style="list-style-type: none"> ■ Identification data: name, surname, User ID. ■ Contact details: e-mail, telephone. ■ Specific details of the competition, prize draw or promotion. 	<p>Allow and manage your participation in contests, sweepstakes and/or promotions.</p> <p>This includes sending communications informing the winners, informing of the winners' names, STORY BUILD's website and social media or other means, as well as informing of matters directly related to such promotions, all of the above including by electronic means.</p>	<p>The execution of the <u>contractual relationship</u> by accepting the legal bases of the different contests, sweepstakes and/or promotions.</p>

5. RETENTION AND STORAGE PERIODS FOR PERSONAL DATA

We will process your personal data while we provide you with services and we will keep them in our files only for the time strictly necessary to fulfil the purpose for which they were collected or until you request their deletion, revoke your consent or request the cancellation of the subscribed service. Likewise, this period shall never exceed the period legally established by the legislation in force. When you exercise your right of deletion, revoke your consent or request the cancellation of the subscribed service, your personal data will only be stored for the legally established period until its effective deletion. All of this, in accordance with the provisions of the applicable regulations.

6. DATA TRANSFERS, INTERNATIONAL TRANSFERS OF PERSONAL DATA AND AUTOMATED DECISIONS

Your data will not be passed on, sold, rented or made available to third parties, with the exception of our service providers (CRM companies, Internet Payment Service Providers, Advertising Services, Software Developers etc.), who will do so on our instructions.

Contracts made with them will be in accordance with the EU GDPR and UK GDPR.

Notwithstanding the foregoing, we will continue to be responsible to you for compliance with our obligations under this privacy policy.

Your personal data may be disclosed to other Vicobook users if your privacy settings permit for the purposes of enforcing our terms and conditions, our company's affiliates, employees, partners, members, processors and sub-processors both outside the UK and within and outside the European Economic Area (EEA) for the purpose of providing the Services.

In this case you will benefit from the protection offered by the EU GDPR and the UK GDPR, to which effect countries outside the UK and non-EU and non-EEA countries to which the data is transferred will provide data protection adequate to the standards of protection in the current legislation.

In this regard we will always seek your express consent, as set out in the Vicobook Platform Terms and Conditions of Use Agreement.

We do not make decisions that may affect you based solely on automated processing of your personal data. All decision-making processes related to the processing purposes described above are carried out with human intervention.

7. CONSENT

Your consent to the processing of your data is very important to us, so we make sure that you understand this privacy policy and the conditions of use of the Vicobook Platform so that your consent is free, specific, informed, explicit and unequivocal.

For this purpose and having the necessary legitimacy according to the EU GDPR and the UK GDPR we ensure that the following conditions for the processing of personal data are met:

- That the data subject has given his or her **consent**;
- That the personal data transferred are necessary to fulfil and comply with its **contractual obligations** to the data subject;

- That the personal data transferred are necessary to comply with a **legal obligation**; or
- That the personal data transferred are necessary to protect the **vital interests** of certain data subjects, such as the protection of their children.

Withdrawal of Consent

The Vicobook Platform offers you the possibility to withdraw your consent at any time by informing us of your right of erasure.

8. MANAGING YOUR RIGHTS

We protect your rights in accordance with the provisions of current legislation and therefore we must inform you that you have the following rights: Right of Access, Right of Rectification, Right of Opposition, Right of Erasure, Right of Limitation, Right of Portability and Right not to be Subject to Individualised Decisions. To exercise these rights, please send a communication to the postal and e-mail addresses:

STORY BUILD LTD
10 GENF Main Street
Glasgow - Scotland G72 7 JH
Email: vicobook@vicobook.com

These are explained in simple terms below:

Right of Access

You can always access your personal data free of charge. In fact, you can always ask about the processing, purpose, categories and recipients of the data transferred and managed by the Vicobook Platform and a copy of the data is made available to you.

Right of Rectification

You can always amend your personal data that is incorrect and complete incomplete or inaccurate personal data without undue delay. In this case, all recipients of personal data will be notified, unless this is considered to be a disproportionate effort.

Right of Opposition

You may object to the processing of your personal data for a specific use (with the exception of certain cases in which the interests of public administrations prevail).

Right of Erasure (right to be forgotten)

You may request that we delete your personal data.

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This will not be possible if:

- Processing is necessary to respect freedom of expression and freedom of information.
- Personal data must be retained in order to comply with a legal obligation.
- There are other public interest reasons for storing personal data, such as for scientific and historical research reasons.
- Personal data should be retained for legal action.

Right of Limitation

You may request the limitation of the processing of your personal data in the following cases:

- As long as the accuracy of your data is contested.
- Where the processing is unlawful, but you object to the erasure of your data.
- Where we do not need to process your data, but we need it for the exercise or defence of claims.
- When you have objected to the processing of your data for the performance of a task carried out in the public interest or for the satisfaction of a legitimate interest while verifying whether the legitimate grounds for the processing outweigh yours.

Right to data portability

You may also exercise your Right to Data Portability, i.e. to have your personal data returned to you or transferred to another company. We will provide you with the same in electronic format.

Right not to be subject to individualised decisions

You have the right not to be subject to a decision based solely on automated processing, including profiling, except for the cases provided for in article 22 of the EU GDPR.

Procedure and time limit for the exercise of rights

When we receive requests to exercise the above rights we will respond without undue delay and in any case within a maximum of one month from receipt. In the case of requests considered complex or multiple requests the time may be extended by up to two months.

We will do this free of charge. In the event that we reject a request, we will inform you of the reasons and of your right to lodge a complaint with the Data Protection Authority.

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If we consider it necessary, we may ask you for a copy of your ID card or equivalent document proving your identity in order to execute your request to exercise your rights.

If you have any questions, you can contact us by sending an email to info@vicobook.com. In addition, you can find more information about exercising your rights or making a complaint to the Information Commissioner's Office (ICO) at ico.org.uk.

9. REVIEW OF THE PRIVACY POLICY

We may revise this privacy policy at any time. The current privacy policy will be available at all times on the Website. All updates will be effective immediately upon posting and will be notified to all Users.

10. ACCEPTANCE

By providing your personal data and/or registering on the Vicobook Platform, you acknowledge that you have read and expressly understood the processing of your personal data for the purposes described in this privacy policy.

II. COOKIE POLICY

This Cookie Policy is an integral part of the Legal Notice and Privacy Policy of our web platform (hereinafter referred to as the "**Vicobook Platform**"). By clicking Accept, you expressly agree to the use of cookies. If you disable cookies, your browsing experience on the Vicobook Platform may not be optimal and some functionalities may not work properly.

In order to facilitate navigation on the Vicobook Platform, its owner, STORY BUILD LTD (hereinafter, "**STORY BUILD**"), informs you that it uses cookies or other files with similar functionality (hereinafter, "**Cookies**"). For this reason, and in order to provide

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the user with all the information necessary for the correct navigation of the Vicobook Platform, we provide you with the following information on what cookies are, what types of cookies are used on our Vicobook Platform and how you can configure or disable them.

In the event that the use of cookies involves the collection of personal data, we inform you that STORY BUILD is the service provider of the cookies and is responsible for the processing of personal data obtained through its own cookies and those of third parties. This is because it is STORY BUILD who decides the purpose, content and use of the processing of the information that has been collected, acting as the party responsible for the processing of personal data that may be collected from the use of Cookies.

1. WHAT IS A COOKIE?

Cookies are files containing small amounts of information that are downloaded to a User's device when visiting a website or digital platform. Their main purpose is to recognise the User each time he/she visits the Vicobook Platform and to enable the quality and usability of the Vicobook Platform to be improved.

Cookies are essential to the functioning of the Internet; they cannot cause any damage to the user's equipment/device and, when enabled in the browser settings, can help to identify and resolve possible malfunctions in the Vicobook Platform.

The Vicobook Platform uses cookies and/or similar technologies that collect and store information while you browse. In general, these technologies can be used for many different purposes such as, for example, to recognise you as a User, to obtain information about your browsing habits or to personalise the way in which content is displayed. The specific uses we make of these technologies are described below.

2. USE OF COOKIES

By clicking the Accept button, you expressly accept the use of this type of cookies on your devices. If you disable cookies, your browsing experience on the Vicobook Platform may not be optimal and some of its functionalities may not work properly.

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In particular, we use Cookies for the purposes explained below. You will be informed if other cookies are used in the future in order to additionally offer improved services.

3. WHAT TYPE OF COOKIES ARE USED ON THE VICOBBOOK PLATFORM AND FOR WHAT PURPOSES?

We use own and third party cookies for the purposes described below.

3.1 OWN COOKIES

First-party cookies are cookies sent to the User's terminal equipment from a device or domain managed by STORY BUILD, and from which the service requested by you is provided. We use the following own cookies:

<p>TECHNICAL COOKIES (FUNCTIONAL): These are mandatory and necessary for the proper functioning of the platform. They cannot be disabled in our systems and provide a secure connection. They also allow us to enable functions and services of our platform, as well as to use security elements during your browsing, among others. You can configure your browser to block or alert you to the presence of these cookies, but some parts of the platform will not work. These cookies do not store any personally identifiable information.</p>		
Name	End	Duration
cookie_notice_accepted	Cookie that remembers whether the cookie warning message has been accepted in order to stop displaying it for as long as it is active.	Indefinite

<p>ANALYTICAL COOKIES: These are cookies that allow the party responsible to monitor and analyse the behaviour of the users of the websites to which they are linked, including the quantification of the impact of advertisements. The information collected through this type of cookies is used to measure the activity of the websites, application or platform, in order to introduce improvements based on the analysis of the usage data of the users of the service.</p>

Name	End	Duration
_ga	The _ga cookie, set by Google Analytics on our domain, calculates visitor, session and campaign data and also tracks site usage for site analytics reporting. The cookie stores information anonymously and assigns a randomly generated number to recognise unique visitors.	24 months

3.2 THIRD PARTY COOKIES

Third-party cookies are cookies sent to the User's terminal equipment from a device or domain not managed by STORY BUILD, but by another entity that processes the data obtained through the cookies. We use the following third-party cookies:

TECHNICAL COOKIES (FUNCTIONAL): These are mandatory and necessary for the proper functioning of the platform. They cannot be disabled in our systems and provide a secure connection. They also allow us to enable functions and services of our platform, as well as to use security elements during your browsing, among others. You can configure your browser to block or alert you to the presence of these cookies, but some parts of the platform will not work. These cookies do not store any personally identifiable information.

Name	S e r v i c e provider	End	Duration
CONSENT	Youtube.com	It is used to detect whether the visitor has accepted the marketing category in the cookie banner. This cookie is necessary for compliance with the GDPR on the web portal.	2 years

ANALYTICAL COOKIES: These cookies allow the party responsible for them to monitor and analyse the behaviour of the users of the websites to which they are linked, including the quantification of the impact of advertisements. The information collected through this type of cookies is used to measure the activity of the websites, application or platform, in order to introduce improvements based on the analysis of the usage data of the users of the service.

Name	S e r v i c e provider	End	Duration
_ga	Google, Inc (G o o g l e Analytics)	It records a unique ID that is used to generate statistical data about how the visitor uses the Website.	2 years
_ga_SESSI ON_ID			

4. ACCEPTANCE, REFUSAL, REVOCATION OF CONSENT OR DELETION OF COOKIES

To allow you to control the use of cookies on our platform, we have implemented a tool, available at any time, which invites you to configure the different Cookies.

Giving consent

Please note that by clicking on the "Accept" button in the cookie banner, you consent to the installation and use of the selected cookies on your device.

Withdrawing consent

For each of the cookies listed above, you can disable them through the cookie settings panel by checking or unchecking the corresponding *checkboxes*, with the exception of technical (functional) cookies that are mandatory and necessary for the operation of the platform.

If you reject Cookies, we will not set additional cookies on your device, except for the technical (functional) cookies detailed above (including, inevitably, a cookie to remember that you do not want Cookies to be set when you visit our platform).

User settings to prevent Cookies

You can enable or disable Cookies, as well as delete your browsing history (including Cookies) from your browser. Please refer to the options and instructions provided by your browser. Please note that if you accept third party cookies, you will need to delete them from the options menu of your browser.

The following information is provided in compliance with the current regulatory framework, so that you can configure the privacy and security of your Internet browser(s) with respect to Cookies. To this end, we provide information and links to the official support websites of the main browsers, so that you can choose whether or not to accept the use of Cookies.

You can block Cookies through your browser settings, or you can set your browser to notify you when a server wants to store a Cookie:

- a) If you use Microsoft Internet Explorer, you can find the option under: Tools menu > Internet Options > Privacy > Settings > Advanced. For more information: <https://support.microsoft.com/en-us/windows/delete-and-manage-cookies-168dab11-0753-043d-7c16-ed5947fc64d>.
- b) If you use Firefox, you can find the option in: Tools menu > Preferences > Privacy > Cookies. For more information: <https://support.mozilla.org/en-US/kb/block-websites-storing-cookies-site-data-firefox> and <https://support.mozilla.org/en-US/kb/clear-cookies-and-site-data-firefox>
- c) If you use Chrome, go to Tools menu > Advanced settings > Privacy. For more information: <https://support.google.com/accounts/answer/32050?hl=en&co=GENIE.Platform%3DDesktop>.
- d) If you use Opera, go to the Security and Privacy Menu. For more information <https://help.opera.com/en/latest/web-preferences/#cookies>
- e) If you use Safari, you will find the option in the Preferences/Privacy menu. For more information: <https://support.apple.com/en-us/HT201265>

5. DATA TRANSFERS TO THIRD COUNTRIES

STORY BUILD has contracted the services of suppliers located outside the European Economic Area ("Third Countries"). These providers have signed the confidentiality and data processing contracts required by the regulations for providers located in Third Countries, applying the necessary guarantees and safeguards to preserve your privacy. These safeguards and guarantees consist of European Commission adequacy decisions and/or standard contractual clauses approved by the European Commission.

You may be informed of such transfers to third parties, if any, by the third parties identified herein in their respective cookie policies.

6. PROFILING INVOLVING AUTOMATED DECISION-MAKING WITH LEGAL IMPLICATIONS FOR THE USER OR WHICH SIGNIFICANTLY AFFECT THE USER

The aforementioned cookies are not used to create profiles that involve automated decision-making with legal implications or that significantly affect users.

7. CONSERVATION PERIOD

Personal data obtained through the use of Cookies will be stored for the period indicated in Section 3 of this Cookie Policy and, after this period has elapsed, for the applicable legal limitation period depending on the purpose.

8. YOUR RIGHTS

To withdraw your consent regarding the use of Cookies and/or exercise your rights of access, rectification, cancellation and portability, limitation and/or opposition to the processing of your data, you can contact us by sending a communication via the postal and e-mail addresses:

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Email: vicobook@vicobook.com

If you consider that the processing of your personal data infringes the regulations or your rights, you can file a claim with our Data Protection Officer at the addresses indicated above, or with the competent official bodies.

Please refer to the Privacy Policy above for information about your rights and how you can exercise them.