

PRIVACY POLICY

1 IDENTIFICATION

- **Data Controller:** Ironhack Group INC Sucursal España (hereinafter, "Ironhack")
- **VAT:** W4009352H
- **Registered Office:** C/ CASTELLO, 115, BAJOS 7 - 28006 MADRID
- **Data Protection Officer (DPO):** You can contact our Data Protection Officer by sending a letter to Ironhack's registered address, to the attention of the "Data Protection Officer" or by sending an e-mail to legal@ironhack.com

2 INFORMATION AND CONSENT.

By accepting this Privacy Policy, the User has been duly informed and has granted his informed, express, free and unambiguous consent for the processing by Ironhack of the personal data collected through the forms of the website www.ironhack.com (hereinafter, the "Website").

Ironhack shall not be liable for any data processing that is carried out through websites that are not directly controlled by Ironhack.

3 OBLIGATION OF PROVIDING DATA

The data requested in the forms of the Website is mandatory (unless specified otherwise) and necessary to carry out the purposes indicated below. Therefore, if such data is not provided or is incorrectly provided, Ironhack shall not be able to furnish any service that you may have requested.

4 PURPOSES OF THE PROCESSING OF YOUR DATA AND STORAGE PERIOD

Personal data provided by the User **through the contact form of the Website** will be processed by Ironhack for the following purpose:

- Solving inquiries, managing suggestions and resolving complaints that the User has reported to Ironhack. Your data will be stored for this purpose during the entire period of time during which your query is managed and, even later, until any possible actions derived from such query have expired.

Personal data provided by the User **through the Newsletter Request form of the Website** will be processed by Ironhack for the following purpose:

- Processing your request of being informed about Ironhack's latest news and events. Your data will be stored until you withdraw your consent.

Personal data provided by **the Ironhack Courses application form of the Website** will be processed by Ironhack for the following purposes:

- Assessing and managing your application and carrying out the necessary actions for the selection of the students. Your personal data will be stored during the entire period of time which your query is managed and, even later, until any possible actions derived from such query have expired.
- In case you check the corresponding box, processing your request of being informed about Ironhack's latest news and events. Your data will be stored until you withdraw your consent.

Personal data provided by **the Ironhack Hiring Partners application form of the Website** will be processed by Ironhack for the following purpose:

- Assessing and managing the condition of being an Ironhack Hiring Partner. Your personal data will be stored during the entire period of time which your query is managed and, even later, until any possible actions derived from such query have expired.

5 PERSONAL DATA PROCESSED BY IRONHACK

In connection with the "contact form" available on the Website, Ironhack will process the following data:

- Identification data: name, surname, etc.
- Contact details: email address, telephone number.

In connection with the "Newsletter Request" form available on the Website, Ironhack will process the following data:

- Contact details: email address.

In connection with the "Ironhack Courses application form" available on the Website, Ironhack will process the following data:

- Identification data: name, surname, etc.
- Contact details: email address, telephone number, etc.

In connection with the "Ironhack Hiring Partners application form" available on the Website, Ironhack will process the following data:

- Identification data: name, surname, etc.
- Employment details: job position, etc.
- Contact data: e-mail address, telephone number, etc.

In the event that the User provides data of third parties, the User declares to have obtained the consent of such third party and undertakes to inform such third parties of the contents of this Privacy Policy. The User accepts that Ironhack waives any liability in this regard.

Notwithstanding the foregoing, Ironhack may carry out periodic verifications and adopt the corresponding due diligence measures, in accordance with the relevant data protection regulations.

6 LAWFULNESS OF THE DATA PROCESSING

Your data will be processed on the following legal basis:

- The processing of the User's personal data on the occasion of solving inquiries, managing suggestions and resolving complaints is based on the consent provided by the User.
- The processing of the User's personal data on the occasion of being informed about Ironhack's latest news and events is based on the consent provided by the User.
- The processing of the User's personal data on the occasion of assessing and managing your application and carrying out the necessary actions for the selection of the students is based on the contractual relationship between Ironhack and the User.
- The processing of the User's personal data on the occasion of assessing and managing the condition of being an Ironhack Hiring Partner is based on the contractual relationship between Ironhack and the User.

Please, take into account that you can withdraw your consent at any time and the withdrawal of your consent shall not affect the lawfulness of any processing carried out before such withdrawal.

7 DATA RECIPIENTS

Your personal data may be communicated to:

- The Public Administrations, in the cases foreseen by law.
- Judges, Courts and Security Bodies, in the cases foreseen by law.
- Services with marketing & data mgmt. purposes:
 - Mailchimp
 - Pipedrive
 - Google Analytics
 - Hotjar
 - Facebook Custom Audience

8 INTERNATIONAL DATA TRANSFERS

Personal information may be disclosed and transferred to:

- Ironhack campuses in Mexico, U.S. & Brazil
- Mailchimp Inc. (U.S.)

9 RESPONSIBILITY OF THE USER

The User:

- Guarantees that he/she is over 18 years old and that the data provided to Ironhack is true, exact, complete and updated. For these purposes, the User is responsible for the truthfulness of all the data provided and will keep the information updated in a timely manner.
- Guarantees that he/she has informed of the contents of this Privacy Policy to any third parties whose data has been provided by the User, if any. He/she also

guarantees that the third party's authorization for the provision of such third party's data to Ironhack for the purposes herein indicated has been obtained.

- Shall be responsible for any false or inaccurate information provided, and shall be liable for any direct or indirect damages caused to Ironhack or third parties.

10 COMMERCIAL COMMUNICATIONS

- 1 One of the purposes for which Ironhack processes personal data provided by Users is to send them electronic communications with information regarding events or relevant news for Users. At any case such type of communications will be addressed only and exclusively to those Users who have expressly expressed their consent.
- 2
- 3 In the event that the User wishes to stop receiving commercial or promotional communications from Ironhack, he can request the cancellation of the service by sending an email to the following email address: legal@ironhack.com

11 YOUR RIGHTS.

The User can contact Ironhack by sending written communication to the address Calle Castello, 115B, Local 7, 28006, Madrid, with the reference "Data Protection", or by sending an e-mail to the address legal@ironhack.com attaching a copy of your ID, at any time and free of charge. The User shall at all times be able:

- To withdraw his/her consent.
- To obtain confirmation about whether personal data concerning the User is being processed by Ironhack.
- To access his/her personal data.
- To rectify inaccurate or incomplete data.
- To request the erasure of his/her data.
- To restrict the processing of personal data whenever any of the conditions of the data protection regulations are met.
- To request the portability of his/her data.
- File a complaint regarding the protection of his/her personal data with the competent national supervisory authority (In case of Spain, the Spanish Data Protection Agency).

These rights shall only be exercised where the requirements set forth in the current regulations are duly met.

12 SECURITY MEASURES

Ironhack shall process personal data at all times in a confidential manner, in accordance with any relevant regulations, by adopting the necessary technical and organizational measures in order to ensure the security of the data and to avoid its alteration, loss, unauthorized processing or access. For the adoption of such security measures, the state of the technology, the nature of the data processed and the risks involving any possible breaches, shall be taken into account.

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