

PRIVACY POLICY

2026

1 . DATA CONTROLLER

The controller responsible for processing your personal data is:

BALIERA GLOBAL, S.L.U.

NIF: B86413689

Registered address: Calle Duque de Sevilla, 3, 28002 Madrid, Spain

Website: <https://baliera.io/>

Privacy email: dataprotection@baliera.io

Hereinafter referred to as “Baliera”, “we” or “the company”.

2 . PURPOSE OF THIS POLICY

This policy explains how Baliera collects, uses, retains, shares and protects the personal data of individuals who interact with our website, forms, communications, events, social media, recruitment processes or professional services.

This policy applies to processing carried out via the Baliera website, forms, emails, commercial communications, events, applications, social media and other digital or corporate channels related to our activities.

3 . OUR DATA PROTECTION PRINCIPLES

We process personal data in accordance with the following principles:

Lawfulness, Fairness and Transparency

We only process data where a valid legal basis exists and we explain clearly how it is used.

Data Minimisation

We collect only the information necessary for each specific purpose.

Purpose Limitation

We do not use data for purposes incompatible with those we have communicated.

Accuracy

We endeavour to keep information up to date and correct it when necessary.

Storage Limitation

We retain data only for as long as necessary or legally required.

Integrity and Confidentiality

We apply appropriate technical and organisational measures to protect personal data.

Accountability

We review our privacy practices to ensure they remain aligned with applicable regulation.

4. CATEGORIES OF DATA WE MAY PROCESS

Depending on your relationship with Baliera, we may process the following categories of data:

Identification and Contact Data

Name, surname, email address, telephone number, company, job title, postal address and any other information you voluntarily provide.

Data Included in Communications

Content of messages sent via forms, email, social media or other contact channels.

Technical and Navigation Data

IP address, technical identifiers, browser, operating system, device, pages visited, date and time of access, duration of visit, website interactions and data derived from cookies or similar technologies.

Commercial Communication Data

Subscription preferences, email opens, link clicks, unsubscribes, interactions and campaign effectiveness metrics, always in accordance with applicable regulation.

Professional or Curriculum Data

Academic and professional information, CV, portfolio, professional links, experience, salary expectations and any other information provided in recruitment processes.

Event-Related Data

Name, surname, company, job title, email address, telephone number, registration and attendance data, image or voice where the event is recorded or photographed and participants have been duly informed.

Data Required to Handle Privacy Rights Requests

Name, surname, contact details, documentation or reasonable information to verify identity, legal representation where applicable, and details of the request submitted.

5. PURPOSES, LEGAL BASES AND RETENTION PERIODS

5.1. Contact and Information Requests

Purpose

To respond to enquiries, information requests, proposals, commercial requests or messages submitted via forms, email or other available channels.

Data Processed

Name, surname, email address, telephone number, company, job title and message content.

Legal Basis

Consent of the data subject and, where applicable, the application of pre-contractual measures requested by the data subject.

Retention

For as long as necessary to process the request and, thereafter, for a maximum period of 12 months, unless a subsequent relationship exists or a legal retention obligation applies.

Disclosures

Data will not be disclosed to third parties except where required by law, operationally necessary to handle the request, or where technology providers acting as data processors are involved.

5.2. Management of Commercial and Professional Relationships

Purpose

To manage relationships with clients, prospective clients, suppliers, collaborators, partners and other professional contacts.

Data Processed

Identification data, contact details, company, job title, communications, contractual or pre-contractual information and data derived from the professional relationship.

Legal Basis

Performance of a contract or application of pre-contractual measures. In some cases, legitimate interest in maintaining professional and corporate relationships.

Retention

For the duration of the relationship and, thereafter, for the legally required periods to address potential liabilities.

Disclosures

To providers, advisers, financial institutions, public authorities or third parties where necessary for service delivery, contractual compliance or legal obligation.

5.3. Newsletter and Commercial Communications

Purpose

To send communications about news, content, events, services, activities, publications or commercial information from Baliera.

Data Processed

Name, surname, email address, company, job title, communication preferences, subscription data, email opens, link clicks, unsubscribes and interactions with communications.

Legal Basis

Consent of the data subject. In certain cases, legitimate interest for communications related to services similar to those previously contracted, always in accordance with applicable e-commerce and communications legislation.

Retention

Until the data subject withdraws consent, requests unsubscription or objects to processing. Interaction data may be retained for a maximum of 12 months from the last interaction, unless a legal obligation or the need to evidence consent applies.

Disclosures

Email marketing, CRM or marketing automation providers acting as data processors may be involved.

Unsubscribing

All commercial communications will include a free, simple and clearly visible mechanism for cancelling the subscription.

5.4. Web Analytics and Digital Experience Improvement

Purpose

To analyse website usage, measure traffic, understand aggregated navigation behaviour, improve content, detect technical issues, optimise performance and strengthen security.

Data Processed

IP address, cookie identifiers, browser, device, operating system, pages visited, navigation events, session duration, traffic source and other technical metadata.

Legal Basis

Consent for analytical, advertising or measurement cookies that are not strictly necessary. Legitimate interest for technical cookies or necessary security and website functionality measures.

Retention

In accordance with the period indicated in the Cookie Policy and the configuration panel. As a general reference, analytical data should not be retained for more than 14 months unless there is specific justification.

Disclosures y proveedores

Technology providers for analytics, measurement, hosting, security or performance may be involved. Where possible, minimisation, anonymisation or pseudonymisation measures will be applied.

5.5. Recruitment and Applications

Purpose

To manage applications, evaluate professional profiles, contact candidates and conduct current and future recruitment processes.

Data Processed

Name, surname, email address, telephone number, CV, education, professional experience, portfolio, professional links, salary information or expectations and any other information voluntarily provided.

Legal Basis

Application of pre-contractual measures requested by the candidate. Consent where the profile is retained for future processes not linked to the original application.

Retention

For the duration of the recruitment process. Where an application is unsuccessful, for a maximum of 12 months, unless consent to retain it for longer for future processes has been obtained. Where no active process or valid consent exists, data will be deleted.

Disclosures

Data will not be disclosed to third parties except where required by law, recruitment providers acting as data processors, or group companies where duly informed and a legal basis exists.

5.6. Social Media

Purpose

To manage Baliera's corporate presence on social media, interact with users, publish content, respond to messages, build community and promote activities, services or events.

Data Processed

Data visible on the social media profile, username, image, comments, messages, interactions, reactions and any information voluntarily provided by the user.

Legal Basis

Consent expressed by following, interacting with or contacting our profiles. Legitimate interest in maintaining corporate presence and managing the community. Contractual relationship with the social platform in accordance with its terms and conditions.

Retention

For as long as interaction, following or a relationship exists via the social media platform, and for the periods necessary to address liabilities or requests.

Disclosures y transferencias

Social media platforms may carry out their own processing, including potential international transfers. Users should consult the privacy policy of each platform.

5.7. Events, Webinars and Corporate Activities

Purpose

To manage registration, attendance, coordination, communication, follow-up, documentation and promotion of events, webinars, conferences, presentations or corporate activities organised or co-organised by Baliera.

Data Processed

Name, surname, company, job title, email address, telephone number, registration and attendance data, preferences, image and voice where the event is recorded or photographed.

Legal Basis

Performance of a contract where the event is paid or implies a contractual relationship. Consent for specific communications or non-necessary uses. Legitimate interest in documenting corporate events and promoting professional activities, always balancing the rights of attendees.

Retention

During the preparation, holding and follow-up of the event and, thereafter, for a maximum of 12 months, unless a legal obligation, additional consent or the need to evidence the relationship applies.

Disclosures

Data may be disclosed to technology providers, registration platforms, videoconferencing tools, venues, speakers, sponsors or collaborators where necessary and where participants have been duly informed.

5.8. Handling Data Protection Rights Requests

Purpose

To manage requests to exercise rights, verify the identity of the person making the request, process the request and retain evidence of the response provided.

Data Processed

Name, surname, contact details, information necessary to verify identity, evidence of representation, content of the request and data related to the processing concerned.

Legal Basis

Compliance with legal obligations in the field of data protection.

Retention

For as long as necessary to handle the request and, thereafter, for the applicable statutory limitation periods.

Disclosures

To the Spanish Data Protection Authority, courts or competent bodies where necessary.

6. DISCLOSURES OF PERSONAL DATA TO THIRD PARTIES

Baliera does not sell personal data.

We may disclose personal data where necessary to:

- Comply with legal obligations
- Provide requested services
- Manage contractual or pre-contractual relationships
- Operate necessary technology tools
- Manage events, communications or corporate processes
- Protect the rights, security or legitimate interests of Baliera or third parties
- Respond to requests from public authorities, regulatory bodies, courts or competent administrations

We may also engage providers who process data on behalf of Baliera as data processors, including hosting services, cloud infrastructure, analytics, CRM, email marketing, automation, security, forms, videoconferencing, event management, technical support and collaboration tools.

These providers must process data in accordance with our instructions, under a data processing agreement and with appropriate guarantees of confidentiality, security and regulatory compliance.

7. INTERNATIONAL DATA TRANSFERS

Some technology providers may process personal data outside the European Economic Area.

Where international transfers occur, Baliera will apply the safeguards required by the GDPR, including, as applicable:

- European Commission adequacy decisions
- Standard contractual clauses approved by the European Commission
- Supplementary technical, contractual or organisational measures
- The provider's adherence to recognised data protection frameworks, such as the EU-U.S. Data Privacy Framework where applicable

Baliera will endeavour to select providers that offer adequate standards of security, privacy and regulatory compliance.

8. USE OF COOKIES AND SIMILAR TECHNOLOGIES

The Baliera website may use cookies and similar technologies to ensure proper functionality, remember preferences, measure website usage, improve content and — where consent has been given — carry out advanced analytics or measurement.

Non-strictly-necessary cookies will only be installed where the user has given consent via the designated configuration panel.

You can accept, reject or configure cookies at any time from the preferences panel.

For further information, please consult the Cookie Policy.

9. INFORMATION SECURITY

Baliera applies appropriate technical and organisational measures to protect personal data against unauthorised access, loss, destruction, alteration, disclosure or unlawful processing.

These measures may include, amongst others:

- Access controls
- Permissions management
- Encryption in transit where applicable
- Back-ups
- Logging and monitoring of technical activity
- Internal security policies

- Provider review
- Training and confidentiality commitments
- Incident management procedures

No system is entirely immune to risk, but we work to maintain a level of security appropriate to the type of data processed, the technology available and the associated risks.

10. MINORS

Baliera's services and content are not directed at individuals under the age of 14.

If we detect that we have received personal data from a child under the age of 14 without valid authorisation from their parents, guardians or legal representatives, we will take reasonable steps to delete or block such data as appropriate.

11. AUTOMATED DECISIONS

Baliera does not make decisions based solely on automated processing that produce legal effects on individuals or similarly affect them in a significant way, unless expressly communicated and a valid legal basis exists.

We may use automated tools to improve internal processes, categorise requests, analyse metrics, optimise communications or strengthen security, always subject to criteria of proportionality, human oversight and respect for individuals' rights.

12. RIGHTS OF DATA SUBJECTS

You may exercise the following rights in relation to the protection of your personal data:

Access

To find out whether Baliera is processing your personal data and obtain information about such processing.

Rectification

To request the correction of inaccurate or incomplete data.

Erasure

To request the deletion of your data where legally applicable.

Objection

To object to certain processing based on legitimate interest or to commercial communications.

Restriction of Processing

To request that we temporarily restrict the processing of your data in certain circumstances.

Data Portability

To receive your data in a structured, commonly used and machine-readable format, where applicable.

Withdrawal of Consent

To withdraw consent at any time, without affecting the lawfulness of processing carried out prior to withdrawal.

Right Not to Be Subject to Automated Decisions

To request not to be subject to decisions based solely on automated processing where these produce legal or similarly significant effects.

To exercise your rights, you may write to:

dataprotection@baliera.io

You may also send a postal communication to:

BALIERA GLOBAL, S.L.U.

Calle Duque de Sevilla, número 3
28002 Madrid, España

The request should specify the right you wish to exercise and allow us to identify you reasonably. Where necessary, we may request additional information to verify your identity or representation.

13. COMPLAINTS TO THE SUPERVISORY AUTHORITY

If you believe that the processing of your personal data does not comply with applicable regulation, you may lodge a complaint with the Spanish Data Protection Authority.

Spanish Data Protection Authority

Calle Jorge Juan, 6
28001 Madrid
www.aepd.es

We recommend contacting Baliera first at dataprotection@baliera.io to attempt to resolve any matter directly.

14. UPDATES TO THIS POLICY

Baliera may update this Privacy Policy to reflect legal, technical, organisational or business changes.

Where changes are material, they will be communicated prominently on the website or via appropriate channels.

Last updated: 9 June 2026