

PRIVACY POLICY

Below, we inform you about the privacy policy that will be applied in those cases in which you (the "Data Subject"), through browsing <https://pawno.io> (the "Website"), provide us with your personal data. This policy will inform about the destination of the personal data that you provide us, including those that we collect by the fact of browsing our Website.

1. IDENTIFICATION

- **Owner:** PAWNTECH SPAIN S.L. ("Pawno" or the "Controller");
- **Registered office:** C/ AYALA 11 -PLANTA 1 28001, MADRID
- **N.I.F.:** B21842356
- **Public Register:** Registered in the Madrid County Court Register, registration code 17111985;
- **E-mail:** info@pawno.io

2. INFORMATION AND CONSENT

In accordance with the provisions of the Regulation (EU) 679/2016 on Data Protection ("GDPR"), the Organic Law 3/2018, of December 5, on Data Protection and Guarantee of Digital Rights ("LOPDGDD"), and the Law 34/2002, of July 11, on information society services and electronic commerce ("LSSI"), the Data Subject is informed of the processing of their personal data collected through the Website.

Only the personal data strictly necessary for each purpose are requested, so that, in general, it will not be possible to provide the service without the corresponding data processing by the Controller.

Browsing the Website is free of charge.

3. ORIGIN, PURPOSE AND LEGAL BASIS

| ACTIVITY: CONTACT | |
|-------------------------|-------------------------------------------------------------------------------------------------------------------------------------|
| PROVENANCE | From the Data Subject itself by sending communications by e-mail to the address provided on the Website. |
| LEGAL BASIS | Consent (6.1.a) GDPR). |
| TREATMENT PURPOSES | To attend and answer the consultations requested by the Data Subject. |
| COLLECTIVE | Individuals. |
| DATA CATEGORY | Name, e-mail address, and any personal information voluntarily provided by the Data Subject in order to fulfill his or her request. |
| TARGET | The transfer to third parties is not foreseen, unless legally required. |
| INTERNATIONAL TRANSFERS | International transfers are not foreseen. |
| STORAGE PERIODS | The data will be kept until the data subject withdraws his/her consent or the purpose for which they were collected has |

| | |
|--|----------------------------------------------------------------|
| | ended, unless the data must be kept due to a legal obligation. |
|--|----------------------------------------------------------------|

| ACTIVITY: REGISTRATION | |
|--------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| PROVENANCE | From the Data Subject through the Website. |
| LEGAL BASIS | Execution of a contract to which the Data Subject is a party; implementation of pre-contractual measures at the request of the Data Subject (6.1.b) GDPR). |
| TREATMENT PURPOSES | To fulfill the Data Subject's wish to create an account on Pawno's platform. |
| COLLECTIVE | Individuals. |
| DATA CATEGORY | Name and surname, date of birth and e-mail address. |
| TARGET | The transfer of data to third parties is not foreseen, except in cases where the Data Subject has expressly consented to specific transfers, which will be duly informed at the time of registration. |
| INTERNATIONAL TRANSFERS | International transfers are not foreseen. |
| STORAGE PERIODS | The data will be kept until the data subject withdraws his/her consent or the purpose for which they were collected has ended, unless the data must be kept due to a legal obligation. |

| ACTIVITY: SERVICES PROVISION | |
|-------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| PROVENANCE | From the Data Subject through the Website. |
| LEGAL BASIS | Execution of a contract to which the data subject is a party (6.1. b) GDPR). |
| TREATMENT PURPOSES | To meet the Data Subject's desire to access Pawno's platform services. |
| COLLECTIVE | Individuals. |
| DATA CATEGORY | Identification data: name, surname(s), ID number, date of birth and documentation proving such identification. Contact information: complete address, e-mail, cell phone number. |
| TARGET | Personal data may be disclosed to the pawnshops with which the Data Subject chooses to contract, in their capacity as data controllers, as such disclosure is necessary for the execution of the contract requested by the Data Subject. Pawno will act as the data processor, solely facilitating contact between the Data Subject and the corresponding pawnshop. |
| INTERNATIONAL TRANSFERS | International transfers are not foreseen. |

| | |
|------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| STORAGE PERIODS | The data will be kept until the data subject withdraws his/her consent or the purpose for which they were collected has ended, unless the data must be kept due to a legal obligation. |
|------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|

| ACTIVITY: SENDING OF NEWSLETTER TO THE DATA SUBJECT | |
|------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| PROVENANCE | From the Data Subject himself/herself by indicating his/her e-mail address in a specific section for this purpose. |
| LEGAL BASIS | Consent (6.1. to GDPR). |
| TREATMENT PURPOSES | To inform the Data Subject electronically about content of interest related to the service provided by Pawno. |
| COLLECTIVE | Individuals. |
| DATA CATEGORY | E-mail. |
| TARGET | The transfer to third parties is not foreseen, unless legally required. |
| INTERNATIONAL TRANSFERS | International transfers are not foreseen. |
| STORAGE PERIODS | The data will be kept until the data subject withdraws his/her consent or the purpose for which they were collected has ended, unless the data must be kept due to a legal obligation. |

4. DATA SUBJECT'S DATA

The Data Subject guarantees that he/she is of legal age or, if a minor, that he/she is old enough to consent to the processing of his/her personal data in accordance with the applicable regulations (i.e. when he/she is over 14 years of age according to Organic Law 3/2018, of December 5, on Personal Data Protection and guarantee of digital rights), and that the data provided are true, accurate, complete and updated, being this responsible for any damage or harm, direct or indirect, that may be caused as a result of the breach of such obligation, beyond the possibility that the Data Subject has to exercise its right of rectification.

In the event that the data provided belonged to a third party, the Data Subject guarantees that he/she has informed said third party of the aspects contained in this document and obtained his/her authorization to provide his/her data to the data controller for the aforementioned purposes.

The Controller cannot guarantee the absolute invulnerability of the systems, therefore, does not assume any liability for damages resulting from alterations that third parties may cause in computer systems, electronic documents or files.

5. COOKIE POLICY

In accordance with the provisions of the GDPR and the LSSI, all personal data obtained through cookies during the use of the Website will be treated in accordance with the provisions of this Cookie Policy.

6. EXERCISE OF RIGHTS

In accordance with the provisions of the GDPR, we inform you that you can exercise your rights of **access, rectification, deletion, opposition, data portability** and **limitation of processing** directly to the Data Controller.

To exercise these rights, the Data Subject may send a message to this effect, indicating name, surname, and indicating the right he/she wishes to exercise, to the following e-mail address: info@pawno.io.

If, after this procedure, the data subject considers that his or her rights are being infringed, he or she may also lodge a complaint with a supervisory authority, in particular in the Member State of his or her habitual residence, place of work or place of the alleged infringement, without prejudice to any other administrative or judicial remedy.

2025 © All rights reserved PAWNTECH SPAIN S.L.

Last update: March 25, 2025.