

PRIVACY POLICY

This Privacy Policy is a document associated with the Website Terms and Conditions of Coding Giants, available at the following address ("Terms and Conditions"):

<https://demo.codinggiants.com/termsandconditions.pdf>

The definitions of the terms used in this Privacy Policy are set forth in the Website's Terms and Conditions. The provisions of the Terms and Conditions shall apply accordingly.

This Policy is for informational purposes and fulfills the information obligations imposed on the data controller under the GDPR—i.e., Regulation (EU) 2016/679 of April 27, 2016, on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (General Data Protection Regulation).

1. PERSONAL DATA CONTROLLER

1.1. The controller of personal data is the Service Provider, namely **Coding Giants S.L.**, with its registered office at C/Aragó 261, 4.2, 08007 Barcelona, Tax Identification Number (NIF): B67556639.

1.2. Contact details of the data controller: **info@codinggiants.com**

2. DATA PROCESSING

2.1. The scope, purposes, and legal basis for the processing of personal data are presented in the table below.

Purpose of Processing	Scope of the Data	Legal Basis for Processing	Duration of Data Processing
To facilitate the submission of the Application	Related to the User: First name, last name, email address, phone number; Related to the Participant: First name, last name, age, zip code	Article 6(1)(b) GDPR – processing necessary for the performance of a contract	Until the conclusion of the contract or the expiration of the limitation period for claims arising from the failure to conclude a contract
To facilitate correspondence in the form of electronic messages.	Email address, first name, last name, and other personal data voluntarily provided by the data subject.	Article 6(1)(f) of the GDPR – the legitimate interest of the data controller in managing inquiries and correspondence directly addressed by data subjects	Until the correspondence is concluded or the data subject objects to the processing

To facilitate access to the website	IP address	Article 6(1)(b) of the GDPR – legal basis for the processing of data necessary for the performance of a contract	Personal data will be retained until the expiration of the applicable statute of limitations for any claims arising from or related to access to the website
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To analyze traffic to and usage of the website.	IP address, cookies [including cookies from third-party tools such as: Facebook Pixel, LinkedIn, Google Analytics, Google Ads, LiveChat, CallPage, Twitter; and cookies used to store the user's discount code]	Article 6(1)(a) of the GDPR – the data subject's consent	Until the data subject no longer has a use for the data or withdraws their consent to its processing
Protection against claims, handling of claims	Email address, given name, surname, and any additional information voluntarily submitted by the individual	Pursuant to Article 6(1)(f) of the General Data Protection Regulation (GDPR), processing is based on the legitimate interests of the data controller in protecting against and managing legal claims	Personal data shall be retained until the expiration of the applicable statute of limitations for any claims arising from or related to access to the website and the user's activities therein, with the limitation period calculated from the date of the user's most recent visit to the website
Record of the development of organized courses	Visual data, including photographs and other images	Pursuant to Article 6(1)(f) of the General Data Protection Regulation (GDPR), processing is based on the legitimate interests of the	Data will be retained until it is no longer relevant for the purposes for which it was collected or until the data subject submits an objection to its processing

		data controller, specifically: (i) to conduct marketing activities; and (ii) to create and develop educational or instructional materials	
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2.2. If the Service Provider is required to transfer personal data to a third country (i.e., outside the European Economic Area), it shall inform the data subject and indicate the legal basis for carrying out such a transfer.

2.3. In the event of a transfer of personal data to a third country, the Service Provider shall verify the safeguards implemented by the data recipient to ensure that the security and integrity of the data are maintained and that the rights of data subjects are respected in the recipient country.

2.4. The Service Provider may carry out profiling for marketing purposes, specifically to present a personalized offer to the data subject. The Service Provider shall not make automated decisions based on the personal data processed. The data subject shall have the right to object to profiling.

3. RECIPIENTS OF PERSONAL DATA

3.1. The Service Provider may entrust the processing of personal data to third parties in order to carry out specific activities. In such cases, the recipients of individuals' personal data may include: the hosting provider for the Service Provider, courier or delivery service providers, companies providing technical support, email distribution service providers, law firms, and accounting offices.

3.2. Personal data collected by the Service Provider may also be made available to competent state authorities upon their request, in accordance with applicable legal provisions, or to other persons and entities as permitted or required by law.

3.3. Each entity to which the Service Provider entrusts personal data for processing under a data processing agreement (hereinafter referred to as the "Processing Agreement") shall ensure an adequate level of security and confidentiality in the processing of such personal data. An entity processing personal data on the basis of the Processing Agreement may further entrust the processing of such data to another entity only with the prior consent of the Service Provider.

3.4. The Service Provider may share the personal data of Users and Participants with the Organizers. The purpose of such disclosure is to enable the Organizers to conclude and subsequently perform the agreement entered into with the User or Participant.

3.5. Each Organizer to whom we disclose the personal data of Users and Participants shall implement appropriate technical and organizational security measures to ensure the protection and integrity of such data. Furthermore, each Organizer is obligated to comply with the duty to inform Users and Participants, i.e., to provide them with information regarding the purposes, legal basis, and principles of data

processing, as well as their rights in this regard.

3.6. The disclosure of personal data to entities not authorized under this Privacy Policy shall only occur with the prior consent of the data subject.

4. RIGHTS OF DATA SUBJECTS

4.1. Each individual whose personal data is processed has the right to:

- (a) request the deletion of their personal data collected by the Service Provider from both the Service Provider's system and the databases of entities with which the Service Provider cooperates or has previously cooperated;
- (b) request the restriction of data processing;
- (c) request the transfer of personal data collected by the Service Provider, including the right to receive such data in a structured, commonly used, and machine-readable format;
- (d) request access to their personal data and the rectification of inaccurate or incomplete data by the Service Provider;
- (e) object to the processing of their personal data;
- (f) withdraw consent previously granted to the Service Provider at any time, without affecting the lawfulness of processing based on consent prior to its withdrawal;
- (g) lodge a complaint against the Service Provider with the supervisory authority (President of the Personal Data Protection Office).

5. OTHER DATA

5.1. The Service Provider may store HTTP requests, and therefore certain information may be saved in the server log files. This information may include: the IP address of the computer from which the request was received, the name of the data subject's workstation – identified through the HTTP protocol, where possible – the date and time of the request registered by the Service Provider's website system, the amount of data transmitted by the server (in bytes), the URL of the previously visited website if the data subject accessed the Service Provider's website via a hyperlink, browser information, and information regarding any errors that occurred during the HTTP transaction.

These logs may be collected for the purpose of the proper administration of the Service Provider's website. Only individuals authorized to administer the IT system have access to this information. The log files may be analyzed to compile statistics related to traffic on the Service Provider's website and to identify errors that occur.

Summaries of such information do not identify individual users.

6. SECURITY

6.1. The Service Provider shall implement technical and organizational measures to ensure the protection of personal data being processed, appropriate to the nature of the risks and the category of data protected. In particular, the Service Provider shall safeguard the data both technically and organizationally against unauthorized disclosure, unauthorized access, unlawful processing, and

alteration, loss, damage, or destruction. Among other measures, SSL certificates are used. The collection of personal data is stored on a secure server, and the data is further protected by the Service Provider's internal procedures on personal data processing and its information security policy.

6.2. The Service Provider has also implemented appropriate technical and organizational measures, such as pseudonymization, designed to effectively apply data protection principles—such as data minimization—and to ensure that processing includes the safeguards necessary to meet GDPR requirements and protect the rights of data subjects.

6.3. At the same time, the Service Provider notes that the use of the Internet and electronically provided services may be subject to risks such as the infiltration of malicious software (malware) into the ICT system or the User's device, as well as unauthorized access by third parties to data, including personal data. To minimize such risks, the data subject is advised to use adequate technical protection measures, such as up-to-date antivirus software and secure internet identification practices. For detailed and professional guidance on maintaining online security, the Service Provider recommends consulting entities specialized in IT security services.

7. COOKIES

7.1. To ensure the proper functioning of the website, the Service Provider uses cookie technology. Cookies are information packets stored on the user's device by the Service Provider, which typically contain data consistent with the purpose of the file through which the user accesses the Service Provider's website. These commonly include: the website address, the date the cookie was created, its expiration date, a unique identifier, and additional information relevant to the cookie's function.

7.2. The Service Provider uses two types of cookies:

- (a) **Session cookies**, which are permanently deleted at the end of the user's browsing session;
- (b) **Persistent cookies**, which remain on the user's device after the browsing session ends until they are manually deleted.

7.3. It is not possible to identify the user through either session or persistent cookies. The cookie mechanism does not allow for the collection of any personal data.

7.4. The Service Provider's cookies are safe for the user's device and do not permit the introduction of viruses or other malicious software.

7.5. Files generated directly by the Service Provider cannot be accessed by other websites. However, **third-party cookies** (i.e., cookies placed by entities cooperating with the Service Provider) may be accessible by external servers.

7.6. Users may independently modify their cookie settings at any time, specifying how cookies are stored through their internet browser settings or website preferences.

7.7. In particular, users may disable the storage of cookies on their device by following the instructions provided by their browser manufacturer. However, doing so may result in some or all functionalities of the Service Provider's website being unavailable.

7.8. Users may also delete cookies stored on their device at any time, following the instructions of their browser manufacturer.

7.9. The Service Provider uses its own cookies for the following purposes:

- website configuration and adapting website content to user preferences or behavior;
- analyzing audience metrics, click paths, time spent on the website, number and frequency of visits to improve the design, layout, and usability of the Service Provider's website.

7.10. The Service Provider also uses third-party cookies for the following purposes:

- generating anonymous statistics to optimize website functionality (Google Analytics);
- creating advertising and remarketing statistics (Facebook Pixel, LinkedIn, Twitter, Google Ads);
- providing chat services for users (LiveChat);
- offering instant callback functionality to users (CallPage).

7.11. Detailed information about cookie use is available in the settings of the internet browser used by the data subject.

8. FINAL PROVISIONS

8.1. This Privacy Policy shall enter into force on June 30th, 2025.