**PRIVACY POLICY**

**Version in force since Dec 24th, 2021**

This Privacy Policy (hereinafter, the **“PRIVACY POLICY**") regulates, in general, the collection and processing by BASQUE **CULINARY CENTER FUNDAZIOA** (hereinafter, **"BCCF")** of the personal data that you provide us, as a registered user of the digital community for the gastronomy sector promoted by this entity (hereinafter, the "**GOe** **COMMUNITY**"), which is accessible through the website [www.goe.bculinary.com](http://www.goe.bculinary.com) (hereinafter, the  **"WEB** **PLATFORM**") and the application for mobile devices *"Gastronomy Open Ecosystem"* available in the Android® market app and Apple® (hereinafter referred to as the**"APP").** All this without prejudice to the specific provisions established in certain sections, forms, or services available on the WEB PLATFORM and/or the APP in order to provide you with the relevant information and, where appropriate, obtain your consent when necessary.

BCCF reserves the right to modify the PRIVACY POLICY to adapt it to new legislation, jurisprudence or administrative, as well as to the practices it develops through the WEB PLATFORM and/or the APP, always considering your rights and interests.

In any case, BCCF will provide you with the appropriate technical resources so that you can access the PRIVACY POLICY to duly comply with the information obligations that correspond to us to observe in accordance with the applicable regulations on data protection.

1. **Who is responsible for the Processing of your data?**

The entity Responsible for the Processing of your data is **BASQUE CULINARY CENTER FUNDAZIOA,** an entity domiciled in Donostia-San Sebastián (Gipuzkoa), Paseo Juan Avelino Barriola, nº 101, registered in the Registry of Foundations of the Basque Country under the Registration number F-253 and with N.I.F. G-20998100.

For any question related to the PRIVACY POLICY and the processing of your personal data you can contact us at the postal address indicated above or through the email address lopd@bculinary.com.

1. **How have we obtained your data?**

The data that we treat in BCCF have been obtained from yourself, through (i) your registration as a user of the GOe COMMUNITY; (ii)any other forms that you complete while browsing through the WEB PLATFORM or the APP; or (iii) by sending a consultation email.

If the personal data provided belonged to a third party, you guarantee that you have informed said third party of the PRIVACY POLICY and have obtained their authorization to provide your data to BCCF for the purposes indicated below.

In cases where, in the forms available on the WEB PLATFORM or in the APP, they indicate it (e.g. by means of an asterisk or a similar marking), the provision of data included in these will be mandatory and its lack of contribution will make it impossible to manage your request, whether it refers to your registration as a user, to obtaining information, or to the use of any of the services available through the WEB PLATFORM and/or the APP.

1. **What kind of data do we process?**

The data that we treat in BCCF are those that you provide us through your registration as a user of the GOe COMMUNITY during your navigation through the WEB PLATFORM and/or the APP through the appropriate forms available in these, or through email.

In particular, BCCF processes the following categories of data:

* Identification data (e.g., name and surname).
* Personal or professional contact details (e.g., postal, and electronic address, telephone number, etc.).
* Professional data (identification of professional function or position, and entity in which it performs them).
* Identification codes and keys as a registered user of the WEB PLATFORM or the APP.
* Image (when the services allow its voluntary incorporation by the user).
* Internet browsing data (e.g., IP address, navigation on the WEB PLATFORM or the APP, etc.).
* Bank and economic transaction data, when the use of the services available on the WEB PLATFORM or the APP requires payment.
* Geolocation data (only in the case of the APP and with the sole purpose of allowing the use of location services for nearby users).

With regard to geolocation data, the APP only makes use of location services if the user grants it the corresponding permission during the login, without BCCF having access to it or processing that data in any way. If these permissions are not granted, the APP will not make use of such data, although part of its functionalities may not be available.

1. **For what purpose do we process your data and under what legitimacy?**

The processing of your personal data has the following purposes:

* Manage and process your registration as a user of the GOe COMMUNITY, the WEB PLATFORM and / or the APP, all based on the contractual relationship established with you.
* Manage your access and use of the contents and services that BCCF makes available to you through the WEB PLATFORM and/or the APP (including, where appropriate, the location services of nearby users), all on the basis of the contractual relationship established with you.
* Process and manage the contracting of additional services that, where appropriate, you formalize with BCCF through the WEB PLATFORM and/or the APP and, in general, maintain, manage, and control the contractual relationship established with us in that context, all on the basis of the contractual relationship.
* Process and manage the request for information, suggestions, complaints or claims that you make through the PLATFORM or email, all based on your request for pre-contractual measures and/or the contractual relationship established with you.
* Manage your subscription to our electronic communication service related to the GOe COMMUNITY and the events and activities that take place around it, as well as the sending of the corresponding communications,provided that you have consented and on the basis of said consent.

We remind you that, in cases where the treatment is based on your consent, you can revoke it at any time freely and free of charge, in the terms indicated in Section 7 below.

1. **To whom do we communicate your data?**

Apart from those cases in which BCCF is obliged to do so by legal imperative (e.g., Tax Administrations, Administration of Justice or other Public Administrations), your data will not be communicated to third parties.

The foregoing is without prejudice to the fact that your professional and contact data, and/or your image, may be shared with all or part of the other members of the GOe COMMUNITY, when you have voluntarily authorized it through the configuration of your account (by default, the account is created with a configuration that does not allow sharing such data).

International transfers of your data are not foreseen.

1. **How long will we keep your data?**

In general, personal data will be kept as long as you hold the status of registered user of the WEB PLATFORM and/or the APP, or until the previous moment in which you revoke your consent (when this is the basis of legality of the treatment) or request its deletion, as well as the additional time necessary to comply with the legal obligations that BCCF must observe.

In any case, we inform you that BCCF has established internal data purification policies aimed at controlling the retention periods of the personal data in its possession, so these may be deleted when they are no longer necessary and/or adequate for the purpose for which they were collected.

1. **What are your rights?**

The applicable regulations on data protection grant you a series of rights relating to your personal data that you may exercise during the processing of these. These rights are as follows:

* Access to your data: you have the right to access your data to know what personal data concerning you we are processing.
* Request the rectification or deletion of your data: in certain circumstances, you have the right to rectify those inaccurate personal data that concern you that are subject to treatment by us or, even, to request their deletion when, among other reasons, the data were no longer necessary for the purposes that were collected.
* Request the limitation of the processing of your data: in certain circumstances, you have the right to request the limitation of the processing of your data, in which case we inform you that we will only keep them for the exercise or defense of claims as provided for in the applicable regulations on data protection.
* To the portability of your data: in certain circumstances, you have the right to receive the personal data that concerns you, and that you have provided to us, in a structured, commonly used and machine-readable format, and to transmit them to another data controller.
* Oppose the processing of your data: in certain circumstances and for reasons related to your situation, you have the right to object to the processing of your data in which case, we would stop processing them unless, for compelling legitimate reasons, or the exercise or defense of possible claims, these must be kept.

Likewise, when the treatment is based on your consent, you have the right to withdraw it at any time, without affecting the lawfulness of the treatment based on the consent prior to its withdrawal.

You may exercise these rights by written request addressed to BCCF, at the postal address indicated in Paragraph 1 or by sending an email addressed to the address lopd@bculinary.com.

Finally, we must indicate that you can file a claim with the competent Control Authority (in Spain, the Spanish Agency for Data Protection), especially when you are not satisfied with the exercise of your rights. You can contact the Authority via its website: [www.aepd.es.](http://www.aepd.es)

1. **Security measures**

BCCF will treat your data at all times in an absolutely confidential manner and keeping the mandatory duty of secrecy regarding them, in accordance with the provisions of the applicable regulations on data protection, adopting for this purpose the necessary technical and organizational measures to guarantee the security of your data and avoid its alteration, loss, processing or unauthorised access, taking into account the state of technology, the nature of the data stored and the risks to which they are exposed.

1. **Cookies policy**

Additionally, we indicate that the WEB PLATFORM and the APP have a Cookies Policy that is accessible through the following link.