

## PRIVACY POLICY

### 1. DATA CO-CONTROLLERS

URTHECAST IMAGING group of companies, which is defined as the group composed of the following companies (“**URTHECAST IMAGING GROUP**”):

- **DEIMOS IMAGING, S.L.U.**, a company incorporated in Spain, with tax identification number B47584529 and with registered address at Parque Tecnológico de Boecillo, Edificio Galileo, Módulo Gris, Oficina 101, (47151) Boecillo, Valladolid, Spain.

- **URTHECAST IMAGING, S.L.U.**, a company incorporated in Spain, with tax identification number B87290821 and registered address at Ronda de Poniente, 19, 2ª planta, (28760) Tres Cantos, Madrid, Spain.

- **DOT IMAGING, S.L.U.**, a company incorporated in Spain with tax identification number B13581459, and registered address at Francia, 9, Poligono Industrial La Nava III, (13500) Puertollano, Ciudad Real, Spain.

- **URTHECAST CORP.**, a company incorporated in Canada, with CUSIP number 91731 and registered address at 33 – 1055 Canada Place, V6C 0C3, Vancouver, British Columbia, Canada.

### 2. PURPOSES OF PROCESSING PERSONAL DATA

URTHECAST IMAGING GROUP processes users’ personal data for the following purposes (the “**Purpose**”):

➤ **Interested parties:**

- Answering information requests received through URTHECAST IMAGING GROUP contact channels.
- Understanding user behaviour on the website, in order to detect potential cyber-attacks on the website [www.deimos-imaging.com](http://www.deimos-imaging.com).

➤ **Clients:**

- Answering requests made by users.
- Provision of contracted services.
- Management of the commercial relationship.
- Sending commercial communications.
- Undertaking quality surveys which allow URTHECAST IMAGING GROUP’s service to be evaluated.
- Attending and resolving complaints and incidents.
- Complying with obligations established by law.
- Understanding user behaviour on the website in order to detect potential cyber-attacks on the website [www.deimos-imaging.com](http://www.deimos-imaging.com). For this purpose, URTHECAST IMAGING GROUP uses the statistical information produced by the Internet service provider.

➤ **Suppliers:**

- Management of the commercial relationship.

➤ **Employment candidates:**

- Managing candidates' applications.
- Communicating with the candidates to inform them about the status of their application and the stage of the selection process.
- Understanding user behaviour on the website [www.deimos-imaging.com](http://www.deimos-imaging.com) in order to detect potential cyber-attacks on the website [www.deimos-imaging.com](http://www.deimos-imaging.com).
- Sending information to candidates regarding the different training carried out by URTHECAST IMAGING GROUP, which may meet their needs; provided that candidates have previously authorised URTHECAST IMAGING GROUP to send this information.

### **3. PLACE OF PROCESSING PERSONAL DATA**

Users' personal data is processed within the European Economic Area and Canada, in accordance with Commission Decision 2002/2/EC of 20 December 2001. URTHECAST IMAGING GROUP will not transfer users' personal data outside of this area, unless URTHECAST IMAGING GROUP is legally obligated to do so.

### **4. LEGAL BASIS OF THE PROCESSING**

The legal basis applicable to the users' personal data processed according to the relationship between users and URTHECAST IMAGING GROUP is the following:

➤ **Interested parties:**

- The consent granted by the user to URTHECAST IMAGING GROUP in order to process his or her personal data for the defined Purpose.
- URTHECAST IMAGING GROUP's legitimate interest to protect its corporate image, business, know-how and experience, avoiding attacks on its website.

➤ **Clients:**

- URTHECAST IMAGING GROUP legitimate interest to protect its corporate image, business, know-how and experience, avoiding attacks on its website.
- The consent granted by the user to URTHECAST IMAGING GROUP in order to process his or her personal data for the defined Purpose.
- In order to execute a contract. URTHECAST IMAGING GROUP informs the users that the communication of users' personal data is necessary to undertake the requested service. By refusing to provide it to URTHECAST IMAGING GROUP, the latter may not be able to provide the requested service.
- URTHECAST IMAGING GROUP's legitimate interest to guarantee the quality of its services.

➤ **Suppliers:**

- In order to execute a contract. URTHECAST IMAGING GROUP informs the users that the communication of users' personal data is necessary to comply with the contract. By refusing to provide it to URTHECAST IMAGING GROUP, the latter may not be able to fulfil its obligations regarding the contract.

➤ **Employment candidates:**

- Users and candidates' consent to URTHECAST IMAGING GROUP in order to process his or her personal data for the defined Purpose.

## **5. VERACITY OF THE DATA**

The user guarantees that the personal data provided are true, precise, complete and updated; and commits to notify any change with regard to the personal data provided through the channels established and indicated in **section 8** of this policy. The user will be liable for any liquidated damages, whether direct or indirect, which may arise as a result of his or her non-compliance with this obligation.

In the case the user provides to URTHECAST IMAGING GROUP third party's personal data, the user declares that: i) he or she has the consent of such third party and ii) will communicate to such third party the information and obligations stated in this policy, exempting URTHECAST IMAGING GROUP from any liability derived from any users' non-compliance with this obligation.

## **6. STORAGE PERIOD**

URTHECAST IMAGING GROUP will keep users' personal data only during the time necessary to undertake the Purpose for which such personal data was gathered and as long as the consent granted has not been revoked.

In the event URTHECAST IMAGING GROUP and the user enter into a binding agreement and such agreement terminates, URTHECAST IMAGING GROUP is obligated to keep user's personal data within the periods that are legally established regarding the activity of URTHECAST IMAGING GROUP.

However, user's personal data will only be stored with regard to the Purpose, and therefore any access or processing other than the ones listed herein are and will be prohibited.

## **7. COMMUNICATION OF PERSONAL DATA**

Users' personal data may be communicated to:

- Public Administrations.
- State Security Forces and Entities.
- Banks and Financial Entities.

## **8. RIGHTS**

Users have the right **to access, rectify and delete their personal data, and to oppose or limit its processing.**

Users can withdraw their consent granted to URTHECAST IMAGING GROUP at any time.

Users also have the right to request **portability of their personal data** (provided that this is technically possible), **unless subject to an automated decision based on a creation of profiles** (although URTHECAST IMAGING GROUP does not make automated decisions based on the creation of profiles or create profiles of any type).

In the case the user disagrees with the way in which URTHECAST IMAGING GROUP has processed his or her personal data, the user will have the right to submit a request or a complaint.

The user can exercise his or her rights in writing and address such notice to URTHECAST IMAGING GROUP – GDPR Compliance Unit, at the following address: Ronda de Poniente 19, portal 1, 2ª planta, (28760) Tres Cantos, Madrid, Spain, or send an e-mail to [lop@deimos-imaging.com](mailto:lop@deimos-imaging.com). Please provide a copy of your personal identification document.

URTHECAST IMAGING GROUP will analyse user's request and/or complain and will respond to the user and resolve the incident as prompt as possible.

If, after URTHECAST IMAGING GROUP response, the user still considers that his or her personal data have not been processed appropriately, the user may submit a complaint before the Data Protection Authorities: <http://www.agpd.es>