

PRIVACY POLICY

Welcome Charity Day

AVALON FOX SLU

1. Data Controller

For the purposes of Regulation (EU) 2016/679 (“GDPR”) and applicable Spanish data protection law, the data controller is:

AVALON FOX SLU

Tax ID (NIF/CIF): B72942360

Registered address: Pasaje Montserrat Isern 1-3, Local II, 08908 L’Hospitalet de Llobregat, Barcelona, Spain

Email: info@avalonfox.com

Phone: +34 722 22 77 07

If you have any privacy-related query, request, or complaint, you may contact us at the email above.

2. Scope of This Policy

This Privacy Policy applies to:

- use of the website;
- submission of free registration forms;
- submission of VIP registration/payment forms;
- QR code and ticket issuance;
- communications before, during, and after the event;
- sponsor inquiry forms;
- related customer support and event-access management.

3. Categories of Personal Data We Collect

Depending on how you interact with the website and the event, we may collect the following categories of personal data:

- full name;
- email address;
- phone number;
- city / country;
- number of guests;
- event attendance category;
- payment-related confirmation data;
- ticketing / QR code data;
- messages or information submitted through forms;
- metadata associated with access control or attendance;
- website technical data such as IP address, browser/device information, logs, cookies, and similar online identifiers.

Where a parent or guardian registers minors, we may also process information concerning accompanying children to the extent necessary for registration and event organization.

4. Sources of Personal Data

We collect personal data:

- directly from you when you complete a form or contact us;
- from the parent/guardian registering a minor;
- from payment, mailing, QR, or technical service providers acting on our behalf;
- automatically through technical means when you use the website, subject to applicable cookie rules.

5. Purposes of Processing

We process personal data for the following purposes:

1. To manage website forms and event registrations.
2. To review, confirm, reject, or manage attendance requests.
3. To issue tickets, confirmations, access credentials, and QR codes.
4. To process VIP payments and related transactional administration.
5. To communicate practical event information, updates, confirmations, and changes.
6. To manage entry control, fraud prevention, duplicate/invalid QR prevention, and event security.
7. To organize hospitality, guest flow, and operational logistics.
8. To respond to sponsor inquiries and other commercial requests.
9. To maintain legal, tax, accounting, and compliance records.
10. To protect the Organizer in relation to complaints, claims, disputes, or security incidents.
11. To improve the website, event organization, and user experience through analytics or similar tools, subject to applicable consent requirements.
12. To create and maintain a reasonable contact history with attendees, VIP guests, and business contacts in connection with the event.

We do not process your data for unrelated purposes incompatible with the ones above.

6. Legal Bases for Processing

Under GDPR, our legal bases may include:

- consent, where you voluntarily submit a form or agree to optional processing;
- performance of a contract or pre-contractual steps, where processing is necessary to manage VIP ticket purchase, issuance, or event access;

- compliance with legal obligations, where retention or disclosure is required by law;
- legitimate interests, including event organization, security, fraud prevention, access control, record-keeping, communications strictly connected to the event, and defense of legal claims, provided such interests are not overridden by your fundamental rights and freedoms.

Where consent is required, you may withdraw it at any time, without affecting the lawfulness of processing carried out before withdrawal.

7. Children and Minors

This event may involve attendance by minors, but registration for minors must be completed by a parent or legal guardian.

Where processing is based on consent, Spanish law provides that a child's personal data may be processed on the basis of the child's own consent only if the child is over 14 years of age; for children under 14, parental or guardian consent is required.

Accordingly:

- we do not knowingly rely on direct consent from minors under 14;
- parents/guardians are responsible for providing registration data relating to accompanying minors;
- by submitting data relating to a minor, the submitting adult confirms that they are authorized to do so;
- we process minors' data only to the extent necessary for event participation, safety, logistics, and access control;
- where photos or videos of minors are captured or published, the organizer will seek to protect the best interests and rights of the child in accordance with applicable law.

8. Mandatory vs Optional Data

Certain data fields are necessary for:

- validating your request;

- issuing a QR code / access credential;
- contacting you regarding the event;
- processing VIP payment and admission;
- managing entry and operational security.

If mandatory data is not provided, we may be unable to process your request or grant access.

9. Payments

VIP payments are processed through the payment/banking flow designated by the Organizer, including Caixa-related processing where applicable.

We do not need to retain full payment instrument data on our own systems beyond what is necessary for transaction administration, proof of payment, reconciliation, fraud prevention, and legal compliance.

Payment providers may act as independent controllers or processors depending on their role and terms.

10. Ticketing, QR Codes and Access Control

When your registration is approved or your VIP purchase is completed, we may issue a QR code or similar access credential.

We process associated personal data to:

- validate identity;
- prevent fraud or unauthorized duplication;
- manage entry status;
- record attendance / redemption;
- investigate misuse, duplicate scans, or security incidents.

Access credentials may be revoked or invalidated where necessary for operational, legal, or security reasons.

11. Recipients of Data

We may share personal data, only where necessary, with:

- website developers and technical providers;
- email / ticketing / QR distribution providers;
- payment and banking providers;
- CRM, hosting, cloud or infrastructure providers;
- event operations providers, security and logistics personnel;
- professional advisers, including lawyers, accountants, auditors or insurers;
- venue operators and access-control staff, where required for the event;
- public authorities, courts, regulators or law enforcement when disclosure is legally required or necessary to defend rights and interests.

We do not sell your personal data.

12. International Transfers

Some service providers may process data outside Spain or the European Economic Area. Where this occurs, we will use appropriate safeguards as required by GDPR, such as:

- adequacy decisions;
- standard contractual clauses;
- or other legally valid transfer mechanisms.

13. Retention Periods

We keep personal data only for as long as necessary for the purposes described above, including:

- while registration or ticketing is active;

- during the preparation, operation, and closure of the event;
- for a reasonable post-event period for operational follow-up, claims handling, or audit trail;
- for the time required by applicable accounting, tax, legal, or regulatory obligations;
- until any applicable limitation periods for legal claims expire.

Where data is no longer needed, it will be deleted, anonymized, or securely blocked as appropriate.

14. Security Measures

We apply appropriate technical and organizational measures designed to protect personal data against accidental or unlawful destruction, loss, alteration, unauthorized disclosure, or unauthorized access.

However, no website, email flow, database, or transmission method can be guaranteed to be completely secure. You therefore acknowledge that data transmission over the internet always involves some residual risk.

15. Automated Decision-Making

As a general rule, we do not make decisions producing legal or similarly significant effects solely by automated means.

However, automated processes may be used for limited operational purposes such as:

- form routing;
- QR issuance;
- duplicate detection;
- anti-fraud checks;
- access status handling.

16. Marketing Communications

We will not send unrelated marketing communications unless there is a lawful basis to do so.

Event-related operational communications, confirmations, reminders, ticketing notices, access instructions, or important schedule changes are considered part of the event service and may be sent where necessary.

17. Data Subject Rights

Under GDPR and applicable Spanish law, you may have the right to:

- access your personal data;
- rectify inaccurate data;
- request erasure;
- request restriction of processing;
- object to processing based on legitimate interests;
- request portability where legally applicable;
- withdraw consent where consent is the basis;
- lodge a complaint with the competent supervisory authority.

In Spain, the supervisory authority is the Agencia Española de Protección de Datos (AEPD). ([aepd.es](https://www.aepd.es))

To exercise your rights, contact: info@avalonfox.com

We may request reasonable proof of identity before acting on your request.

18. Complaints

If you believe your data has been processed unlawfully, you may contact us first so we can try to resolve the issue. You also have the right to file a complaint with the AEPD.

19. Cookies and Similar Technologies

This website may use cookies and similar technologies for technical, functional, analytical and, where applicable, advertising purposes.

Under Spanish guidance, analytics cookies generally require informed consent unless they fall within a narrow exempt category, and the cookie layer should include a clear option to reject cookies as well as accept them. The AEPD's cookie guidance also rejects old

implied-consent approaches such as treating mere continued browsing as sufficient consent in many cases.

Accordingly:

- if non-essential cookies are used, the website should provide an appropriate consent banner;
- users should be able to accept or reject non-essential cookies;
- additional cookie information should be set out in a separate Cookies Policy.

20. Legal Notice / Website Information

For a Spanish company website, Spanish law requires that certain identifying information be accessible electronically in a permanent, easy, direct and free manner. This is typically covered through a separate Legal Notice / Aviso Legal page.

21. Third-Party Links

The website may contain links to third-party services or social platforms. We are not responsible for the privacy practices of those third parties, and you should review their policies separately.

22. Changes to This Policy

We may amend this Privacy Policy from time to time to reflect legal, technical or operational changes.

The latest version published on the website shall apply from the date of publication.

23. Contact

For any privacy, rights, or data-protection issue, contact:

AVALON FOX SLU

Email: info@avalonfox.com

Phone: +34 722 22 77 07