

PRIVACY POLICY

GENERAL INFORMATION AND DATA CONTROLLER

The present text contains the privacy policy (hereinafter, the "Privacy Policy") applied to your personal data on the website www.myrealfood.app and the corresponding mobile application (hereinafter, referred to indistinctly or jointly as the "Platform"), owned by MYREALFOOD APP, S.L., (hereinafter, indistinctly, "MyRealFood" or the "Controller").

All the legal texts are at the disposal of the users and/or interested parties in the Platform. These texts may be modified and/or updated according to the needs and activities carried out by MyRealFood.

1. WHO IS RESPONSIBLE FOR THE PROCESSING OF YOUR DATA?

MyRealFood, is the legal entity responsible for the collection and processing of your personal data in connection with the services it provides.

MyRealFood is committed to respecting and safeguarding your privacy and the security of your data. The identifying data of the data controller are:

Identidad:	MYREALFOOD APP S.L.
VAT:	ESB67477950
Postal address:	CARRER PALLARS, 193, 08005, BARCELONA
E-mail address:	hello@myrealfood.app
Data Protection Delegate:	hello@myrealfood.app

2. DATA PROCESSED

The Controller processes the following personal data, which it accesses by the following means:

2.1. Direct: If you have registered, through your email, in MyRealFood, the data you provide us with are the following:

- Identifying personal data and personal characteristics: name, surname, telephone, email, gender and date of birth.
- Device characteristics: information about the operating system, battery, available storage space, device language, time zone, etc.

2.2. Technical: when using the Application, it automatically accesses a series of data and elements of the mobile device on which it is installed. Most operating systems inform the user before allowing the download of the Application and some of them allow the user to limit these accesses (although they may prevent the normal use of the Application). The current version of the Application employs the following accesses (with the processing of personal data that each access implies): (1) access to the device's photographs and multimedia files, (2) read and write from the device's storage memory, and (3) information from the device's Wi-fi connection.

2.3. Data associated with browsing the Platform: When the User accesses the Platform, MyRealFood collects data associated with the User's browsing habits on the Platform. Thus, all actions performed by the user within the Platform (e.g., saving a product as a favorite, consulting or scanning products...) associated with the user ID, date and time, and the IDs of other elements associated with this action (e.g., ID of the product that was saved as a favorite).

2.4. Data associated with the Cookie Policy: for this, please refer to our Platform Cookie Policy.

2.5. Data from your communications with MyRealFood: when you send us a communication, we collect the metadata of the communication (time and date of the e-mail, identity of the sender and receiver, technical data) and the data incorporated in any communication between the User and MyRealFood).

2.6. Data included in the User's Tracking: when recording meals, weight and calories eaten, MyRealFood collects any personal data included in such Tracking.

2.7. Data included in the Plan Plus service (only for users subscribed to the Plan Plus service): goal of losing fat, gaining muscle, or maintaining, and reason, type of diet, allergies, intolerances, and dietary preferences, number of daily meals, meal variety, coffee or tea consumption, level of physical activity, gender, age, height and weight.

2.8 Data included in the Consultation Plus service (only for users subscribed to the Consultation Plus service): goal of losing fat, gaining muscle, or maintaining, and reason, type of diet, allergies, intolerances, and dietary preferences, number of daily meals, meal variety, coffee or tea consumption, level of physical activity, gender, age, height and weight. Additionally, previous or current health conditions, medication or supplement intake, recent lab tests or intolerance tests, past dieting history, daily routine, digestion characteristics, digestive symptoms and waist circumference.

Prohibited Data: in any case it is prohibited to provide to MyRealFood or to publish on the Platform, (especially but not only in the User Content) any content that contravenes any prohibition and limitation set forth in the Terms of Service (especially but not only, the prohibition to use personal data – both of the User itself and of third parties – containing sensitive information relating to identifiable or identified persons, such as, for example: racial origin, trade union membership, religion, ideology or sexual orientation, health data, or data relating to criminal records, proceedings and penalties or fines arising therefrom or breaches of monetary obligations).

The User guarantees the authenticity and veracity of all data (especially but not only those that are personal data) communicated through the Platform, which are personal data and the image of his person or that he has permission from the person concerned to use such data, and that they will keep the information provided to MyRealFood updated, so that it responds at all times to their real situation, being solely responsible for any false or inaccurate statements made, as well as the damages caused thereby to MyRealFood or third parties.

3. PURPOSE AND LEGITIMACY TO PROCESS PERSONAL DATA

In accordance with the provisions of current legislation, MyRealFood only collects the data strictly necessary to provide the services derived from its activity and other services, management and activities attributed by law.

Your personal data will only be used for the following purposes:

FOR WHAT?	LEGITIMATION
<p>1. Carry out the necessary administrative procedures with the users of the platform.</p>	<p>The processing is necessary for the performance of a contractual relationship to which you are a party or for the app at your request for possible pre-contractual measures (Article 6.1.b) GDPR).</p>
<p>2. THE SENDING OR DISPLAY OF ELECTRONIC COMMERCIAL COMMUNICATIONS. MAY BE OF TWO TYPES: (A) RECOMMENDATIONS OF USER CONTENT OR SIMILAR THAT, BASED ON THE INFORMATION AVAILABLE TO US, MAY BE OF INTEREST TO THE USER (INSEPARABLE ASPECT OF THE PLATFORM SERVICE, I.E., MAIN PURPOSE, THAT CAN NOT BE REJECTED BY THE USER EXCEPT BY UNSUBSCRIBING FROM THE PLATFORM) OR (B) THE PERIODIC REMISSION OF ELECTRONIC COMMERCIAL</p>	<p>The processing will be carried out only if you have given your consent (article 6.1.a) GDPR). That is, if you have checked the appropriate box.</p>

<p>COMMUNICATIONS (INCLUDING E-MAILS) PROMOTION OR ADVERTISING OF SERVICES AND PRODUCTS OFFERED BY MYREALFOOD (THE USER WILL HAVE THE OPTION TO OPPOSE THE RECEIPT OF THE LATTER TYPE OF ELECTRONIC COMMERCIAL COMMUNICATIONS AND THE PROCESSING OF PERSONAL DATA REFERRED TO BOTH IN THE COLLECTION OF DATA AS IN EACH OF THE ELECTRONIC COMMERCIAL COMMUNICATIONS). IN BOTH TYPES OF ELECTRONIC COMMERCIAL COMMUNICATIONS THE SECTORS INVOLVED WILL BE THE FOOD, HEALTH AND SPORT IN THE BROAD SENSE AND THAT OF MYREALFOOD SERVICES OF INFORMATION OR ELECTRONIC COMMERCE. COMMUNICATIONS MAY INCLUDE LINKS TO EXTERNAL PAGES AND PROMOTIONS OFFERED BY BRANDS OR COMPANIES COLLABORATING WITH MYREALFOOD.</p>	
<p>3. Respond to queries and/or provide information requested by the user;</p>	<p>The processing is based on your consent, and may be necessary for the performance of a contractual relationship to which you are a party or for the app at your request for possible pre-contractual measures (Article 6.1.b) GDPR).</p>
<p>4. Perform the services and/or products contracted or subscribed by the user.</p>	<p>The processing is necessary for the performance of a contractual relationship to which you are a party or for the app at your request for possible pre-contractual measures (Article 6.1.b) GDPR).</p>
<p>5. To use your data for contact, both electronically and non-electronically, to obtain your feedback on the service provided and to improve the quality of the service. This data does not include Health Kit or Google Fit data.</p>	<p>The processing is carried out for the satisfaction of our legitimate interest, which is to manage and improve our products and services (Article 6.1.f) GDPR), always taking into account that our interest does not prevail over your interests, rights and fundamental freedoms.</p>
<p>6. Use your Health Kit or Google Fit data solely to provide health, movement or fitness services in connection with the app. This data will not be used for marketing, advertising or data mining based on usage, including third parties.</p>	<p>The processing is based on your consent, and may be necessary for the execution of related functionalities in the application, and may be necessary for the execution of a contractual relationship to which you are a party or for the app at your request for possible pre-contractual measures (Article 6.1.b) GDPR).</p>

<p>7. NOTIFY YOU OF CHANGES, IMPORTANT DEVELOPMENTS IN THE PRIVACY POLICY, LEGAL NOTICE OR COOKIE POLICY.</p>	<p>The processing will be carried out in order to comply with the duty to inform the Data Controller under Article 13 GDPR.</p>
<p>8. THE INFORMATION IN THE DATABASES MAY BE USED FOR THE IDENTIFICATION OF USERS AND FOR STATISTICAL STUDIES OF REGISTERED USERS.</p>	<p>The processing will be carried out in an anonymized form, and will be carried out for the satisfaction of our legitimate interest, which is to manage and improve our products and services (Article 6.1.f) GDPR), always taking into account that our interest does not prevail over your interests, rights and fundamental freedoms.</p>

To unsubscribe, you can go at any time to the Application, in the section: profile, configuration and choose the option to unsubscribe.

If the above option is not enabled or does not work for any reason, you can also revoke your consent at any time by sending an email with the subject "Unsubscribe User" to hello@myrealfood.app, including in the body of the email the user name and email or username used when registering on the Platform.

4. HOW LONG WILL WE KEEP YOUR DATA?

MyRealFood will process your personal data for the period necessary to fulfill the purposes set out in this Privacy Policy, as well as to retain your personal information in compliance with the provisions of the relevant laws and regulations, especially in relation to statutory limitation periods, and for the formulation, exercise or defense of claims.

The criteria we follow for this is determined by; (a) the purpose of the data collected and the fulfillment of that purpose (e.g. as long as our relationship continues); (b) the reasons for which the data is collected (e.g. in case of consent, you can revoke it at any time); and (c) mandatory storage periods according to contractual and regulatory requirements.

Please note that, in some cases, we may retain your data for the necessary period for the formulation, exercise or defense of claims, requirements, liabilities and legal, contractual or ethical obligations, provided that they are properly blocked.

5. WHO MAY BE RECIPIENTS OF THE COMMUNICATION OF DATA?

Your personal data will not be communicated to third parties without your express consent. However, depending on the purposes for which the personal information is collected, the following persons may have access to such information:

- Employees and/or collaborators authorized by MyRealFood, always subject to the applicable data protection regulations;
- Agencies and / or competent authorities and the relevant law enforcement agencies, in cases where there is a requirement and / or a legal obligation.
- Third party business partners. These are third parties that offer their products and/or services through the App. All this only after carrying out the necessary measures to ensure that we can share such information and having entered into the corresponding processing contract, in accordance with applicable data protection regulations.
- Third-party service providers that process information as data processors. We have entered into the corresponding data processing contract in accordance with the applicable data protection regulations.

6. RIGHTS OF THE PERSONS CONCERNED

As a User, you may request the exercise of the following rights before MyRealFood by submitting a letter to the postal address in the heading or by sending an email to hello@myrealfood.app, indicating as subject: "GDPR: Rights of the interested party", attaching a photocopy of the ID card or any analogous means in law, as indicated by law:

- Right of access: allows the interested party to know and obtain information about their personal data subject to processing.
- Right of rectification or suppression: allows to correct errors and modify data that prove to be inadequate or excessive.
- Right of opposition: the data subject's right not to have his or her personal data processed or to have it stopped.
- Limitation of processing: entails the marking of the personal data retained, in order to limit future processing.
- Data portability: provision of the data undergoing processing to the data subject, so that he/she can transmit it to another data controller without hindrance.
- Right not to be subject to automated individual decisions (including profiling): the right not to be subject to a decision based on automated processing that produces effects or significantly affects.

As a user, you have the right to withdraw your consent at any time. The withdrawal of consent will not affect the lawfulness of the processing carried out prior to the withdrawal of consent.

You also have the right to lodge a complaint with the supervisory authority if you consider that your rights in relation to the protection of your data may have been violated.

7. OFFICIAL MEANS OF COMMUNICATION

The user is informed that the means enabled by MyRealFood to communicate with customers and others affected is the corporate email.

In the case of sending personal information through a communication medium other than that indicated in this section, MyRealFood will be exempt from liability in relation to security measures available to the medium in question.

8. ADDITIONAL INFORMATION

In accordance with the Directive on electronic commerce, MyRealFood does not engage in SPAM practices, therefore, does not send commercial e-mails that have not been previously requested or authorized by the User. Consequently, in all communications that you will receive from MyRealFood, the User has the possibility to cancel their express consent to receive our communications.

The free and voluntary subscription to the Platform is considered as the establishment of a contractual relationship between MyRealFood and the User. Therefore, sending informative communications and promotions related to food, health, healthy living and sport is considered part of the service contracted by the user at the time of subscribing to the Platform. This is without prejudice to the fact that the user may, at any time, unsubscribe from communications or configure your profile to not receive them.

Please note that the publications made on the Platform are the property of MyRealFood, including that of minors, in which, to obtain these, prior consent has been obtained from parents, guardians or legal representatives by signing the forms made for this purpose by the centers in which minors are part.

MyRealFood may have a presence in social networks. The processing of data that is carried out of the people who become followers in social networks and / or perform any link or action of connection through social networks of the official pages of MyRealFood will be governed by this section, as well as the conditions of use, privacy

policies and access regulations belonging to the social network that applies in each case and previously accepted by the user.

MyRealFood will treat your data for the purposes of properly managing its presence in the social network, informing you of activities, products or services.

The publication of content is prohibited:

- That are allegedly unlawful by national, community or international regulations or that perform allegedly unlawful activities or contravene the principles of good faith.
- That violate the fundamental rights of persons, lack of courtesy in the network, disturb or may generate negative opinions in our users or third parties and in general any content that MyRealFood considers inappropriate.
- That contravene the principles of legality, honesty, responsibility, protection of human dignity, protection of minors, protection of public order, protection of privacy, consumer protection and intellectual and industrial property rights.

Also, MyRealFood reserves the right to remove, without prior notice from the corporate social network, those contents that are considered inappropriate.

In the event that the User sends personal information through the social network, MyRealFood shall be exempt from liability in relation to the security measures applicable to this platform, and the user should consult the corresponding particular conditions of the network in question if he/she wishes to know them.

The data provided will be treated confidentially. MyRealFood has adopted all technical and organizational measures and all levels of protection necessary to ensure security in the processing of data and avoid its alteration, loss, theft, treatment or unauthorized access, according to the state of technology and nature of the data stored. It is guaranteed that the treatment and registration in files, programs, systems or equipment, premises and centers comply with the requirements and conditions of integrity and security established in the current regulations.

9. CHANGES TO THIS PRIVACY POLICY

MyRealFood reserves the right to modify this policy to adapt it to new legislation or jurisprudence.

In any case, the modification of the Privacy Policy will be notified to users.

10. LEGISLATION

For all purposes, the relationship between MyRealFood with all Users of its services, present on the Platform, are subject to Spanish legislation and jurisdiction to which the parties expressly submit themselves, being competent for the resolution of all disputes arising from or related to its use the Courts and Tribunals of Barcelona.