

## **Annex to the Privacy Policy: Processing of Geolocation Data in the Background in the TICGAL Support Application**

### **Purpose of Geolocation Processing**

The TICGAL Support app may require access to and processing of the user's geolocation data even when the app is not in active use (background operation). The main purposes of the processing are:

- Provision of the app's core service, which requires continuous location information (e.g. real-time tracking, routing, geo-based automation).
- Enhancement of the user experience through personalisation functionalities, contextual reminders or geo-suggestions.
- Non-individualised statistical analysis, for the purpose of improving the performance and functioning of the app.

### **Legal Basis for Processing**

The processing of geolocation data in the background is based on the following legal bases:

- Explicit and informed consent of the user (art. 6.1.a of the GDPR), granted through the app interface and the permission settings of the device's operating system.
- The user may revoke such consent at any time, without retroactive effect, from the privacy settings of their device or through the mechanisms enabled in the application itself.

### **Category of Data Processed**

The data collected in this context includes:

- Geographical position data (latitude, longitude, altitude, direction).
- Motion information (velocity, acceleration, displacement patterns).
- Metadata associated with location events.

Special categories of personal data (art. 9 of the GDPR) linked to location will not be processed unless the user expressly and separately consents to this.

### **Background collection**

TICGAL Support may collect location data in the background, only if the user has granted specific consent for such functionality through the mobile device's operating system (iOS/Android), by selecting the option "Always allow" or equivalent.

Background processing is conditional on the maintenance of such permission, which the user can modify at any time.

### **Recipients and Transfers**

- The data will not be transferred to third parties, unless required by law or with the express consent of the data subject.
- They may be processed by duly contracted data processors who provide technical support, cloud storage or maintenance services, in accordance with art. 28 of the GDPR.
- International data transfers are not envisaged, unless expressly indicated and with prior consent.

### **Retention period**

The location data will be kept **only for the time necessary** to fulfil the purpose for which they were collected or as long as the user does not withdraw his or her consent. Subsequently, they will be anonymised or securely deleted.

### **Rights of the Data Subject**

The user, as the owner of the personal data, may at any time exercise his or her rights of:

- Access, rectification, deletion, limitation, portability and opposition (arts. 15 to 22 of the RGPD).
- As well as withdrawing consent without affecting the lawfulness of the previous processing.

Likewise, the user has the right to lodge a complaint with the corresponding supervisory authority (for example, AEPD in Spain or the applicable national authority).

### **Security measures**

The location data are treated with appropriate technical and organisational security measures, in accordance with art. 32 of the RGPD, including encryption, limited access and traceability control, in order to guarantee their confidentiality, integrity and availability.

### **Review and Updates**

This annex may be updated in accordance with regulatory or functional changes to the application. In this case, the user will be informed through the app itself or through the registered contact channels.