

Privacy Policy

Access from our website www.astroflow.app or from the Astroflow mobile application, under the responsibility of BABILON SKY S.L. (hereinafter referred to collectively as the "Platform"), to certain areas, services, and products, content, and/or resources of Astroflow will only be possible upon prior provision by Astroflow customers and users (hereinafter referred to individually as "User" and collectively as "Users") of certain categories of personal data. In such cases, Users will be required to provide certain personal data, which will be subject to automated or non-automated processing by BABILON SKY S.L., as the Data Controller duly identified in accordance with the provisions of this Privacy Policy.

In this sense, and during the registration process and the collection of personal data of its ownership, the User will be informed of which specific categories of personal data must be provided mandatorily to access certain areas, services, products, and content under the responsibility of BABILON SKY S.L. Consequently, all registration and use of the Platform implies an express, specific, and informed acceptance of this Privacy Policy by the Astroflow User.

In connection with the use and navigation of the Platform, Astroflow stores the connection data of the device used by the User to access the services and resources offered through it. In this sense, when the User accesses the Platform, the system where they are hosted automatically recognizes the IP address of their device, information about their device, the type of device, their Internet connection, browser type, version, and operating system, the date and time they logged in, logged out, and which parts of our Platform they navigated (clickstream). It is necessary for our system to know this data and information about their device because it needs to be able to communicate with it to send what it requests through their browser and/or application and consequently for the User to see it on their screen.

Neither our system nor we can know your personal data, such as name, address, telephone, etc., unless the User has provided them to us.

The system where our Platform is hosted uses, according to the desired configuration at any time by each User, cookies to facilitate Users' navigation, as well as for statistical, personalization, and advertising purposes. See the Astroflow Cookie Policy.

BABILON SKY S.L. reserves the right to modify, adapt, or update this Privacy Policy concerning each data collection at any time and with reasonable notice to

adapt it to legislative, judicial, or jurisprudential changes that may affect it, as well as industry practices. Notwithstanding the foregoing, when such modifications, alterations, and/or updates involve or imply a substantial or additional change in the processing of your personal data, you will be duly informed and, where appropriate, your consent will be obtained for the new processing.

The User declares under their responsibility and guarantees that the data provided to BABILON SKY S.L. are true, correct, and belong to them, and in the case of providing personal data of third parties, the User guarantees to have previously informed them of the corresponding processing under the terms indicated below, and particularly and where appropriate, to have obtained their prior express and informed consent to provide them and for the specific purpose of processing our services. In this sense, it will be the Users' obligation to keep the information and data updated so that they correspond to reality at all times. Any false or inaccurate statement resulting from the information and data provided, as well as the damages that such information may cause, will be the direct responsibility of the Users.

Confidentiality and security are core values for BABILON SKY S.L., and consequently, we assume the commitment to guarantee user privacy at all times and not to collect unnecessary information, as well as the commitment to comply with current legislation on data protection and to respect the values and principles of transparency and fairness, safeguarding the data and adopting all measures to avoid alteration, loss, processing, or unauthorized access according to the current data protection regulations. However, Users are informed that the referred security measures are not unbreakable and/or invulnerable. Below, we provide you with all the necessary information about our Privacy Policy concerning personal data.

1. DATA CONTROLLER

BABILON SKY S.L.
NIF B16709594
C/ San Marius 52 2-1
08022 –Barcelona Spain Contact
DPO: contact@astroflow.app

Hereinafter "Astroflow," "we," or the "Data Controller." This Privacy Policy covers all data collected and used by us on the Astroflow mobile application (hereinafter and interchangeably referred to as "the Platform" or "App"). If

you have any questions or concerns about how we process and use your personal data or wish to exercise any of the rights described above, please contact contact@astroflow.app

2. PERSONAL DATA COLLECTED AND PURPOSES OF PERSONAL DATA PROCESSING

Personal Data refers to any information or data that can identify you, either directly or indirectly.

In this regard, the personal data collected by Astroflow includes:

"Registration" Form: In the event that you decide to register on Astroflow, BABILON SKY S.L. requires processing your personal information to:

Identify you as an Astroflow user. For the mere aforementioned purposes, BABILON SKY S.L. needs to process the personal data provided as a result of the complete registration of the User in one or another ecosystem (e.g., your Name and Surname, email address, gender, place of birth, date, and time of birth) for incorporation and association to a "Record" of your ownership that will allow us to identify you during the processes of contracting products and/or services and/or requesting information required by the interested party at any given time, as well as to process all this information together. If you wish, you can provide us with a photograph of your image, which will be used to identify your profile.

Enjoy, receive, and participate by sending commercial and advertising communications electronically or otherwise promoted by BABILON SKY S.L. of the information, content, products, services, surveys, events, and workshops of these environments with the corresponding management and personalization (i.e., the assessment of your preferences, tastes, and consumption habits).

As a result of the aforementioned, the User is informed that their personal data will be processed to adapt the previously described service to the tastes, consumption habits, and preferences of the User, which allow offering a personalized service of interest, tailoring our offers and recommendations to these preferences, even through the realization of studies and analysis on these tastes, habits, and consumption preferences, occasionally employing fragmentation and/or segmentation techniques that allow profile elaboration. No automated decisions will be made based on this commercial profile that affect the fundamental rights and freedoms of the Users.

Regarding these electronic commercial communications promoted by BABILON SKY S.L., the User is informed that they can unsubscribe from these communications at any time through the mechanisms enabled for this purpose in these communications or by exercising the data protection rights to which they are entitled under the law and in the terms indicated below.

Enjoy "Push Notifications." Similarly, the User can enjoy and receive "push" notifications through Astroflow's digital environments, which can be activated and deactivated at any time from the corresponding electronic device or browser.

Enjoy and participate in the different personalized remarketing actions generated through the functions of Google Ads, Meta Ads, X Ads, Bing Ads, LinkedIn Ads, and Pinterest Ads.

At BABILON SKY S.L., we use Internet advertising to keep our Users updated on our news, promotions, and discounts, as well as to help them find certain products or services marketed by us. In this sense, BABILON SKY S.L. uses the remarketing functionalities or means of the following social networks and digital platforms, namely Meta Inc. ("Meta"), Google LLC. ("Google"), Microsoft Corporation ("Microsoft"), X Inc. ("X"), LinkedIn Corporation ("LinkedIn"), and Pinterest Inc. ("Pinterest"), which allow these Users to see segmented advertising from Astroflow, that is, based on the particular interests of each User when visiting the social networks Meta, LinkedIn, X, and Pinterest, as well as the environments of Google (YouTube, Google searches, etc.) or Microsoft (namely, the Bing search engine).

Thus, and thanks to this remarketing functionality, specific audiences can be created from certain categories of personal data owned by our Users, as well as generate specific digital marketing campaigns aimed at each target audience. For this purpose, BABILON SKY S.L. needs to share with the aforementioned social networks or digital platforms the following categories of personal data owned by our Users, namely name and surname, age, gender, postal address, email address, telephone, interests, and tastes, using technical measures and methodologies that guarantee the confidentiality, integrity, and availability of this personal information - such as the use of cryptographic functions like hashing.

This information shared by BABILON SKY S.L. will be deleted by each social network or digital platform immediately after the completion of the specific personalized remarketing action and under no circumstances will it be accessed by any unauthorized third party.

Regarding these remarketing actions promoted by BABILON SKY S.L., Users are informed that they can unsubscribe from them at any time by exercising the data protection rights to which they are entitled under the law and in the terms indicated below. However, Users are informed that the request to unsubscribe from these actions implies unsubscribing from all digital interactions promoted by Astroflow through these digital environments and, consequently, the inability to enjoy marketing campaigns generated through techniques or tools such as "similar audiences" or to enjoy the functionalities of these environments.

Enjoy and participate in the different digital marketing actions generated through the "LookALike Audiences" tool of Google Ads, Meta Ads, X Ads, Bing Ads, LinkedIn Ads, and Pinterest Ads. Thanks to the personalized or similar audiences functions provided by Meta, Google, Microsoft, X, LinkedIn, and Pinterest, new specific audiences can be created related to a specific target audience, and this based on specific categories of personal data owned by our Users, such as name and surname, gender, age, postal address, email address, telephone, interests, and tastes.

In this sense, BABILON SKY S.L. needs to share with the aforementioned social networks and/or digital platforms information about our registered Users whom we suspect belong to the target group to be impacted and share similar profiles and characteristics or common interests.

Subsequently, the corresponding social network or platform will decrypt the data transmitted by BABILON SKY S.L. (to the extent that the owner of this information is a member of the social network or platform) as part of its relationship with the referred social network or digital platform to be able to show specific advertisements to users of these social networks or platforms with profiles similar to those of the shared database Users - without it implying that the identity of this new audience is revealed to BABILON SKY S.L.

This information shared by BABILON SKY S.L. will be deleted by each social network or digital platform immediately after the campaign ends and under no circumstances will it be accessed by any unauthorized third party.

We recommend our Users review the Privacy Policies of these environments for more details on these digital marketing actions available at the following links:

Link to Meta's Privacy Policy: <https://www.Meta.com/policy.php>

Link to Instagram's Privacy Policy:

<https://www.Meta.com/help/instagram/155833707900388>

Link to Pinterest's Privacy Policy: <https://policy.pinterest.com/privacy-policy>

Link to LinkedIn's Privacy Policy: <https://www.linkedin.com/legal/privacy-policy>

Link to Bing's Privacy Policy: <https://privacy.microsoft.com/privacystatement>

Link to X's Privacy Policy: <https://x.com/privacy>

Regarding these digital marketing actions promoted by BABILON SKY S.L., Users are informed that they can unsubscribe from them at any time by exercising the rights to which they are entitled under the law. However, Users are informed that the request to unsubscribe from these actions implies unsubscribing from all digital interactions promoted by BABILON SKY S.L. through these digital environments and, consequently, the inability to enjoy remarketing campaigns promoted by us, as well as the functionalities of these environments.

Enjoy Astroflow's own Digital Advertising.

Likewise, the User may see banners and advertisements from Astroflow on other websites, applications, and social networks managed through cookies or similar technologies if they activate through the present Platform or the web environment, application, or social network they are browsing, the functionality for this advertising service. For more information, see the Cookie Policy.

In this regard, for your safety, we have trusted the payment system through Apple Store. Subscription to our services will be done through the Apple Store. App

Analytics Processing: Access to the Astroflow App requires the processing of your navigation data for analytical and statistical purposes that allow us to understand how Users interact with our App and thus be able to introduce improvements to it.

App Geolocation Processing: Regarding geolocation, Astroflow informs the User that it is a system by which the App uses the device's sensors to locate the User at a point on the map. The User expressly and explicitly accepts that the Astroflow App accesses these data upon installation. If the User uses the IOS system (Apple) to download the App, they can give express consent to the use of geolocation by the App. If the User uses the Android system (Google), the Google system itself (outside of BABILON SKY S.L.) informs the

User of everything that needs to be accepted from the beginning to install the App, as well as the remaining functionalities (optional) to be enabled by the User in the App, one of them being geolocation. In any case, the User can uninstall this geolocation option on their device at any time by following the corresponding instructions or steps informed on their device - if the App is uninstalled, geolocation cannot be used. Geolocation data is anonymous and is not stored in any Astroflow file.

Data obtained when contacting us and addressing your inquiries and/or requests: When you contact us through the means provided on the Platform, we collect any data you voluntarily provide through the contact email, such as your name and email address.

You guarantee that all data about your identity and legitimacy provided to BABILON SKY S.L. in the corresponding forms on the Platform is truthful, accurate, and complete. You also commit to keeping your data updated. In the event that you provide any false, inaccurate, or incomplete data, or if BABILON SKY S.L. considers that there are well-founded reasons to doubt the truthfulness, accuracy, and completeness of them, BABILON SKY S.L. may deny you access and use of the Platform or any of its contents and/or services.

Consequences of not providing personal data: Providing Personal Data requires a minimum age of 18 years or, where appropriate, sufficient legal capacity to contract. The requested personal data is necessary to manage your requests and/or provide the services you are interested in; therefore, if you do not provide them, we will not be able to serve you properly or provide the requested services. In any case, we reserve the right to decide whether or not to include your personal data and other information in our databases.

Likewise, we also collect information that you provide indirectly when creating an account and using our services:

Information on how you use our products, the features you use, the actions you take, the people or accounts you interact with, and how you interact with them. Information derived from your use of the Platform in an aggregated manner to implement improvements in the functioning of the Platform and provide you with recommendations that may be of interest to you. Additionally, and in general terms, the personal data provided through the use of the Platform is necessary for the following purposes:

Identify you as a user and give you access to the different features, products, and services available to you as a service user.

Perform correct service management and provide the requested service.

Manage and track the contractual and pre-contractual relationship maintained with you. Provide you with a means to contact us. Respond to your questions and/or requests. Communicate with you by email regarding new services, updates, or any other matter we consider may be of interest to you. Improve, develop, and test our Platform. Protect the rights, property, and/or safety of Astroflow. On the other hand, for the proper functioning of the Platform, we use technical and functional cookies to:

- Correctly receive reminders, technical recommendations, service updates from the Platform, security alerts, and support messages.
- Improve the services you might subscribe to by studying your behavior as a user to tailor it to your needs and preferences.
- Generate reports and statistics in a dissociated manner.
- Research, develop, and improve user services or offer new services, features, and tools. Depending on the products, services, or features to which the User subscribes or wants to enjoy at any given time, BABILON SKY S.L. will process some data or others, which will generally be, as the case may be: Identifying personal data (e.g., Name and Surname, email address, gender, place, date, and time of birth); Connection and navigation data (if you interact with us from electronic devices); Geolocation data (if you interact with us from the mobile); Commercial and advertising information and data; and Data on your tastes and preferences.

3. LEGITIMIZATION FOR PERSONAL DATA PROCESSING

The processing of your data is necessary for the execution of the terms governing the use and enjoyment of the Platform (Astroflow). In any case, you are giving us your consent by accepting this privacy policy through the consent mechanisms established on the Platform.

Similarly, we consider that we have a legitimate interest in performing the necessary checks to detect and prevent potential fraud when you register on the Platform.

In general terms, the legal basis or legitimation for the processing of your personal data provided through the digital environments of BABILON SKY S.L.

will be as duly identified in our privacy policies, which may be, as the case may be, the express consent requested from the User for each processing purpose, the fulfillment of your high expectations, the execution of pre-contractual or contractual measures requested by the User, as well as the legitimate interest that binds our relationship.

Specifically, we find:

Verify the user's age: Minors are not authorized to register on this Platform or to contract services. The legal basis for processing the user's date of birth is the existing legal obligation. Manage service contracting on the Platform: The legal basis is the contractual and pre-contractual relationship maintained with you at the time of accepting the corresponding Terms and Conditions, as well as your consent by accepting this privacy policy through the established consent. User support: we have a legitimate interest in addressing the requests or inquiries you raise through the various contact means available. When you contact us for managing incidents related to the use of the Platform, the processing is necessary for the execution of the contractual relationship maintained with you. When your inquiry is related to exercising the rights we inform you of below or with claims related to our services, what legitimizes us to process your data is the fulfillment of legal obligations on our part. Regarding quality aspects, we have a legitimate interest in analyzing the usability of the Platform and the degree of user satisfaction, as the aim is to improve the user experience and offer a higher quality service. Sending commercial and advertising communications with the Astroflow service to which you are subscribed: The legal basis is legitimate interest in accordance with Recital 47 of the General Data Protection Regulation (REGULATION (EU) 2016/679 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL of 27 April 2016).

4. RECIPIENTS OF COLLECTED PERSONAL DATA

Your Personal Data may be communicated to third parties, i.e.: To fulfill the purposes indicated in this Privacy Policy, it is necessary that for certain cases and services, we give access to your personal data to third-party recipients, such as other Data Controllers or service providers of BABILON SKY S.L. (Data Processors of BABILON SKY S.L.). Regarding the latter, BABILON SKY S.L. has signed the corresponding data processing contracts with each of the providers that provide services to BABILON SKY S.L. to ensure that these providers will process your data in accordance with current legislation.

a) Service providers - "Data Processors": Technology service providers; Electronic signature service provider; Payment solutions provider; Customer service-related service providers; Marketing and advertising communication service providers;

b) Service providers - "Data Controllers": Credit institutions, financial entities; Fraud detection and prevention entities;

Similarly, some of these Data Processors may be located in territories outside the European Economic Area (the countries of the European Union plus Liechtenstein, Iceland, and Norway).

For this purpose, BABILON SKY S.L. will adopt appropriate guarantees, always safeguarding the integrity and confidentiality of your data. With some of these providers, BABILON SKY S.L. has signed Standard Contractual Clauses adapted by the European Commission as a guarantee of those transfers made to countries that do not have an adequacy decision from the European Commission (https://ec.europa.eu/info/law/law-topic/data-protection/data-transfers-outside-eu/model-contracts-transfer-personal-data-third-countries_en).

Outside of these cases, BABILON SKY S.L. will not communicate your personal data to third parties unless express or contractual authorization or legal obligation or permission is given.

c) Community and other Astroflow users:

By creating an Astroflow username to access the "Compatibilities" feature and accepting these terms and conditions, the user agrees that Astroflow is an astrological community where other users may have access to certain private information provided during registration. This information includes the user's First Name, Last Name, Date of Birth, and Place of Birth. The purpose of sharing this information is to facilitate interaction and astrological analysis between community members and their astrological compatibilities. Astroflow is committed to protecting its users' privacy and taking reasonable measures to ensure the security of the shared data. However, users should be aware that by accessing the mentioned "Compatibilities" feature, they are authorizing access to this information by other users. Users can manage their privacy preferences and configure who can access their information in their profile settings by setting their profile to "private." Astroflow will not be responsible for the use other users make of this shared information.

5. RETENTION OF YOUR PERSONAL DATA

We will only retain your Personal Data for the period necessary for the purposes for which we process them until your account is deleted or the data subject requests their deletion, or during the legally established period for this purpose (the data retention period will be determined by commercial, accounting, and tax regulations or other current regulations that establish a mandatory retention period longer than the aforementioned).

Personal Data obtained through Platform registration or email will be retained until the service is performed or during the time necessary to resolve your inquiry.

We may retain some personal data to fulfill our legal or regulatory obligations, as well as to manage our rights (for example, to enforce our claims in court) or for statistical or historical purposes. In case of inactivity, BABILON SKY S.L. will retain the personal data provided by Users for a maximum period of 12 months, without prejudice to the possibility of exercising your rights in the terms indicated below.

6. RIGHTS REGARDING YOUR PERSONAL DATA

The User may exercise the rights recognized in the data protection regulations regarding the data collected in the manner provided in this Privacy Policy, in particular the rights of access, rectification, deletion, opposition, limitation, and data portability.

Interested Users have the right to access their personal data and to request the rectification of inaccurate data or, where appropriate, to request their deletion when, among other reasons, the data is no longer necessary for the purposes for which they were collected.

In certain circumstances, Users may request the limitation of the processing of their data, in which case BABILON SKY S.L. will only retain them for compliance with legal and administrative obligations, defense of our interests and rights, as well as for the exercise or defense of claims, sanctions, and liabilities.

The User will also have the possibility to withdraw consent at any time for any processing for which consent has been granted, without affecting the lawfulness of the processing based on the consent prior to its withdrawal.

When the rectification or deletion of personal data is carried out, they must be blocked. Specifically, data blocking consists of "identification and reservation of data by adopting technical and organizational measures to prevent their processing, including their viewing, except for making the data available to

judges and courts, the Public Prosecutor's Office, or competent Public Administrations, in particular data protection authorities, for the enforcement of possible liabilities arising from the processing and only for the period of prescription of these liabilities."

The rights referred to may be exercised by the User, duly indicating the reason for their claim, by sending an email to contact@astroflow.app. Requests sent by email must be made from the email address registered by the applicant. In any case, the User must accompany their request with a copy of their valid National Identity Document or, where appropriate, their valid Foreigner Identification Number to exercise the mentioned rights and to provide guarantees of identification of the corresponding applicant.

Additionally, if you consider that your data has been processed inadequately, you have the right to file a complaint with the Spanish Data Protection Agency (C/ Jorge Juan 6. 28001 – Madrid www.aepd.es).

7. SECURITY OF YOUR PERSONAL DATA

To safeguard the security of your personal data, we inform you that we have adopted all necessary technical and organizational measures to ensure the security of the personal data provided, protecting them from alteration, loss, processing, or unauthorized access.

Privacy Clause for the Use of Astroflow GPT

a. Information Collected

To provide personalized astrological interpretation services, Astroflow GPT may collect and process the following personal information:

- Date, time, and place of birth: This information is necessary to accurately calculate the natal chart and provide astrological interpretations.
- Interaction data: Includes inquiries made, responses received, and any other interaction with the system to improve the service's accuracy and personalization.

b. Use of Information

The information collected is used exclusively for the following purposes:

- Natal chart generation: Use birth data to calculate the position of planets and other astrological elements.
- Personalized astrological interpretations: Offer analysis and recommendations based on the natal chart and inquiries made.
- Continuous service improvement: Analyze interactions to improve the accuracy and quality of interpretations and recommendations.

c. Storage and Security

We commit to protecting users' personal information through the following measures:

- Data security: Implement technical and organizational measures to protect personal data against unauthorized access, alteration, disclosure, or destruction.
- Data retention: Personal information is retained only as long as necessary to fulfill the purposes described in this clause unless the law requires or permits a longer retention period.

d. Information Sharing

Astroflow GPT does not share, sell, or rent personal information to third parties, except in the following cases:

- User consent: When the user has given explicit consent to share the information.

- Legal requirements: When necessary to comply with a legal obligation or to protect the rights, property, or safety of Astroflow, our users, or others.

e. User Rights

Users have the right to:

- Access: Request access to the personal information we have about them.
- Correction: Request the correction of inaccurate or incomplete personal information.
- Deletion: Request the deletion of their personal information, subject to certain legal exceptions.
- Restriction of processing: Request the limitation of the processing of their personal information in certain circumstances.

f. Changes to this Clause

We reserve the right to update this privacy clause at any time. We will notify users of any significant changes by posting the new clause on our website and, where appropriate, through other communication means.

Date of last modification: May 31, 2024