

Privacy Policy

RELOSPAIN · relospain.com

Joint controllers of personal data: RELOCYBERSEC, S.L. (NIF B56220395) and RSX HOLDING LIMITED (Business Registration Number 78641591), Unit 2A, 17/F, Glenealy Tower, No.1 Glenealy, Central, Hong Kong S.A.R. (together, the “Controllers”, “we”, “us”).

The Controllers jointly determine the principal purposes and means of processing in connection with the ReloSpain website and services. RELOCYBERSEC, S.L. processes personal data under Regulation (EU) 2016/679 (GDPR) and Spanish Organic Law 3/2018 (LOPDGDD); RSX HOLDING LIMITED processes personal data under the Hong Kong Personal Data (Privacy) Ordinance (Cap. 486) (PDPO) and the applicable Data Protection Principles. Each Controller also complies with other laws applicable to it.

1. Personal data we collect

- Identification data: name, date of birth, passport or identity-document details;
- Contact data: email address, telephone number and postal address;
- Service-related data, including document and financial information where required for a particular service;
- Technical data: IP address, cookies, browser and device data;
- Other information you provide through forms or communications with us.

2. Purposes of collection and use

- Providing requested consultancy and related services;
- Communications, responding to enquiries and customer support;
- Entering into and performing contracts;
- Operating, analysing and improving the Site and services;
- Complying with legal obligations and protecting legal rights;
- Sending marketing communications only where the required consent exists, with an option to opt out.

3. Legal bases for processing

- Your consent, where required;
- Processing necessary to enter into or perform a contract;
- The Controllers' legitimate interests, where not overridden by your rights and interests;
- Compliance with a legal obligation;
- Other grounds permitted by applicable law.

4. Disclosure, international transfers and retention

We may disclose data between the Controllers and to partners and service providers (such as lawyers, real-estate agencies, hosting, email and analytics providers) only to the extent necessary for the purposes above and subject to appropriate contractual and organisational safeguards.

Because the Controllers are located in Spain and Hong Kong, processing may involve international transfers. Transfers subject to the GDPR will use a Chapter V GDPR mechanism where required, such as an adequacy decision or appropriate safeguards (including standard contractual clauses). For

transfers subject to the PDPO, reasonable steps will be taken to ensure a comparable level of protection.

Personal data relating to the provision of services and the client relationship may be retained for 10 years from completion of the services or the client's last substantive interaction with us, unless a longer period is required by applicable law. This period supports service-history management, the protection of legal rights, the handling of potential claims and, where an appropriate legal basis exists, informing the client about document-renewal dates and related services.

Contact details are used for marketing or promotional communications only where the required consent or another lawful basis is available. Withdrawal of marketing consent will stop such communications, but does not by itself require deletion of data that must or may lawfully be retained for other purposes. At the end of the applicable retention period, the data will be deleted or anonymised.

5. Cookies and similar technologies

We use necessary cookies to operate the Site. Analytics and marketing cookies are used in accordance with applicable requirements and, where required, with your consent. You can manage your choices through the Site's cookie settings and your browser.

6. Your rights

Depending on applicable law, you may request access to and correction of your data, erasure, restriction, data portability, or object to processing, and you may withdraw consent without affecting the lawfulness of processing before withdrawal. Under the PDPO, you may also submit a Data Access Request or Data Correction Request.

You may complain to a competent supervisory authority, including the Agencia Española de Protección de Datos (where the GDPR/LOPDGDD applies) or the Privacy Commissioner for Personal Data, Hong Kong (where the PDPO applies). Send requests to hello@relospain.com. The Controllers have designated this as a single contact point; this does not restrict your right to contact either Controller separately.

7. Security

We implement reasonable technical and organisational measures to protect data against unauthorised access, loss, misuse, alteration or disclosure, taking into account the nature of the data and processing risks.

8. Changes to this Policy

We may update this Policy, and the current version will be published on the Site. Where applicable law requires separate notice or renewed consent, we will provide it; continued use of the Site alone does not replace consent where consent is required.

9. Contact details

RELOCYBERSEC, S.L. — NIF B56220395
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