

# Privacy Policy

February 2021 version

## 1.- Who is responsible for the processing of your data?

The person responsible for the processing of your personal data is **WONDER IN PROGRESS, SL**, (hereinafter, "**WONDER IN PROGRESS**"), with NIF: B-88313325 and registered office at Calle Conde de Xiquena nº6 Puerta G, Planta 1º, CP 28004, Madrid, registered in the Madrid Mercantile Registry in Volume 38638, Folio 191, General Section of Companies, Page M-687139, 1st Entry.

We inform you that the ownership of the KOTOKAN App and this Website through the domain [www.kotokan.net](http://www.kotokan.net) (hereinafter, the "**Website**"), is WONDER IN PROGRESS.

The access and/or use of the Website, attributes the condition of User (hereinafter, the "**User**"), and implies the acceptance, from said access and/or use, of this Privacy Policy.

The User may contact WONDER IN PROGRESS at the following email address: [info@kotokan.game](mailto:info@kotokan.game).

## **2.- Why is WONDER IN PROGRESS legitimized to carry out data processing?**

WONDER IN PROGRESS is entitled to process your data in order to carry out the provision of its services.

Likewise, WONDER IN PROGRESS is entitled to process your data based on the consent requested from the User or on a legitimate interest if applicable.

WONDER IN PROGRESS takes the protection of your privacy and personal data very seriously. Therefore, your personal information is kept secure and handled with the utmost care.

This Privacy Policy regulates access and use of the service (hereinafter, the “Service”) that WONDER IN PROGRESS makes available to the User interested in the services.

In this sense, the legitimation bases used by WONDER IN PROGRESS for the treatment of User data are:

- i) The contractual performance by registering on the Website and registering and using the KOTOKAN App.
- ii) The consent of the Users to the processing of their personal data for the purposes specified in each case.

### **3.- What are the purposes of the processing of your personal data by WONDER IN PROGRESS?**

Your personal data collected by WONDER IN PROGRESS may be used for the following purposes, according to the consent granted in the corresponding registration form:

#### **3.1 The provision of WONDER IN PROGRESS services.**

For the provision of the service requested by the User, WONDER IN PROGRESS will need to process personal data obtained from the information that the User provides to WONDER IN PROGRESS.

For the provision of the service by WONDER IN PROGRESS, the treatment of data of teachers and students, who access the Website and the App through the registration form, will be included.

We inform you that WONDER IN PROGRESS is proactive in protecting your privacy and your personal data.

In this sense, we inform you that WONDER IN PROGRESS will carry out in any case a treatment with total confidentiality and in accordance with the provisions of the applicable regulations on the protection of personal data, adopting the necessary security measures to guarantee the security of the processed data.

The sending of commercial communications and/or Newsletter by WONDER IN PROGRESS.

If the User has consented to it, their personal data may be used to send them by letter, telephone, email, SMS / MMS, or by other equivalent electronic means of communication, commercial communications or information from WONDER IN PROGRESS.

#### **4.- Veracity of the data provided by the Users and data of minors.**

The User guarantees that the personal data provided are true and is responsible for communicating to WONDER IN PROGRESS any modification of these. The User will respond, in any case, to the veracity of the data provided, reserving WONDER IN PROGRESS the right to exclude from the registered Services any User who has provided false data, without prejudice to the other actions that may proceed in Law.

The data provided to WONDER IN PROGRESS by students may involve the processing of data of minors.

#### **5.- Data retention**

WONDER IN PROGRESS will keep the personal data of the users only for the time necessary to carry out the purposes for which they were

collected, as long as the User does not revoke the consents granted and/or does not express their willingness to unsubscribe from the services of WONDER IN PROGRESS, and this with the purpose of receiving information about the company's services.

Subsequently, if necessary, WONDER IN PROGRESS will keep the information blocked for the legally established deadlines.

## **6.- Rights of the User in relation to their data**

The User has the right to:

- i) Access your personal data.
- ii) Request the rectification of inaccurate data
- iii) Request its deletion.
- iv) Request the limitation of the processing of your data.
- v) Oppose the processing of your data.
- vi) Request its portability.
- vii) Not be the subject of automated individual decisions.

The User can exercise all these rights at the following email address [info@kotokan.game](mailto:info@kotokan.game) indicating the reason for their request and providing a copy of their ID.

The User can also send his request by ordinary mail to the following address:

**WONDER IN PROGRESS, S.L.**

**N.I.F.: B-88313325**

**C/ Conde de Xiquena nº6, Planta 1º, 28004, Madrid, Spain**

Without prejudice to any other administrative remedy or legal action, the User will have the right to file a claim with a Control Authority, in particular in the Member State in which they have their habitual residence, place of work or place of the alleged infringement, in case you consider that the processing of your personal data is not adequate to the regulations, as well as in the case of not being satisfied with the exercise of your rights. The supervisory authority to which the claim has been submitted will inform the claimant about the course and result of the claim.

## **7.- Data security**

The protection of privacy and personal data of Users is very important to WONDER IN PROGRESS. Therefore, WONDER IN PROGRESS does everything in its power to prevent your data from being used improperly, allowing access to it only to authorized personnel.

WONDER IN PROGRESS maintains the security levels of protection of personal data in accordance with the applicable regulations and has established all the technical means at its disposal to prevent the loss, misuse, alteration, unauthorized access and theft of the data that the User provides through the Website without prejudice to informing you that Internet security measures are not impregnable.

WONDER IN PROGRESS undertakes to comply with the duty of secrecy and confidentiality regarding personal data in accordance with the applicable legislation, as well as to grant them a secure treatment in the international transfers and assignments of data that, where appropriate, may occur.

In those services of the Website that require registering as a User, a password must be chosen. The User is responsible for maintaining the confidentiality of this password, as well as for all activities that occur in the session started with his name and password.

The User agrees to notify WONDER IN PROGRESS as soon as possible of the unauthorized use of their Username and/or password or any other security failure. WONDER IN PROGRESS will not be responsible for any damages or losses that may arise due to the User's non-compliance with this obligation.

## **8.- Changes**

WONDER IN PROGRESS reserves the right to revise its Privacy Policy at the time it deems appropriate. For this reason, please check this Privacy Policy regularly to read the most recent version of it.

However, any change that occurs in this Privacy Policy will be communicated to the User.

## **9.- Links to other webpages**

The WONDER IN PROGRESS Platform may contain links to web pages of third-party companies and entities.

WONDER IN PROGRESS cannot be held responsible for the way in which these companies treat the protection of privacy and personal data, so we advise you to carefully read the Privacy Policy statements of these web pages that are not owned by WONDER IN PROGRESS in relation to the use, processing and protection of personal data.

The conditions offered by these web pages may not be the same as those offered by WONDER IN PROGRESS.

## **10.- Questions**

If you have any questions about this Privacy Policy or the treatment of your data, please contact WONDER IN PROGRESS by email to the following email address: [info@kotokan.game](mailto:info@kotokan.game).



## **11.- Acceptance and Consent**

The User declares to have been informed of the conditions on the protection of personal data, accepting and consenting to the treatment of these by WONDER IN PROGRESS, in the manner and for the purposes indicated in this Privacy Policy.