



Last Revised: January 8, 2025

ENEO Tecnología S.L. and its subsidiaries ("**redborder**", "**we**", "**us**", or "**our**") know that you care about how your information is used and shared, and we take your privacy seriously. ENEO's Privacy Policy describes our practices and policies regarding the personal data that we collect from individuals who visit ENEO's website (located at www.redborder.com) and interact with ENEO online, and from ENEO Products and related services (including support and education) offered by ENEO (the "**Services**").

1. Personal Data ENEO Collects

We may collect data, including Personal Data (as defined below), about you as you use our website and Services and interact with us. "**Personal Data**" means any data relating to an identified or identifiable individual, including, for example, your first and last name, email address, and phone number.

Personal Data You Provide to ENEO

You may provide us with certain categories of Personal Data when you:

- Complete and submit forms on our website
- Download white papers or other ENEO content
- Register for webcasts, seminars, conferences, etc. sponsored by ENEO or a partner
- Subscribe to our newsletters or other ENEO content-related materials
- Register for support, courses, training or education
- Provide us with feedback or contact us via phone, email, social media or otherwise
- Participate in a survey
- Submit a job application via our website
- Use community forums on our website
- Purchase ENEO Products or Services.

Personal Data Collected Automatically

ENEO's website uses automatic data collection tools, such as cookies and web beacons. These tools automatically collect the following:

- Technical information including, but not limited to, browser type, operating system, device information, IP address, domain name, referral URL, time zone setting, and/or a time-stamp for your visit.
- Usage information including, but not limited to, geographic location information (such as your country or state), the numbers and frequency of visitors to our site, page views, unique page views, video views or form conversions.

Cookies and Tracking Technologies

Our website uses cookies and similar tracking technologies to enhance your experience. For more information on how we use cookies, please refer to our cookie policy:

<https://redborder.com/cookie-policy-eu/>

2. How ENEO Uses Personal Data

ENEO uses the Personal Data we collect for two main purposes: (1) to operate our business and provide the Services, and (2) to send communications, including marketing communications. For example, we may use Personal Data to:

- Respond to your requests and questions for certain products and services
- Administrate our website and Services
- Customize the content and advertising you see on our website
- Communicate with you regarding our company, Services and changes to our terms and conditions

3. Data Collected for ENEO Customers

Our Services are offered and designed primarily for use by organizations. When a Customer purchases, uses or subscribes to our products, or obtains support for such products, ENEO collects certain categories of data (each as defined below) that may include Personal Data in order to provide the Services:

“Administrative Data” is data related to employees or representatives of Customer (each an **“Account Administrator”**) that is collected and used by ENEO in order to administer or manage ENEO’s delivery of the Services, or the Customer’s account. Administrative Data may include Personal Data such as the first and last name, email address, professional title, company name, address, city and password an employee or representative of Customer provides.

ENEO uses Administrative Data to contact Account Administrators to provide information about a Customer’s account, subscriptions, billing and updates to the Services, including information about security, support and maintenance.

“Payment Data” is data related to Customer’s financial health that a Customer provides to ENEO in connection with making a purchase or entering into an agreement for Services.

ENEO uses Payment Data to complete transactions, as well as to detect and prevent fraud.

4. Legal Basis for Processing Personal Data

We process your personal data based on the following legal grounds, as required under the General Data Protection Regulation (GDPR):

- **Consent:** When you have provided your explicit consent to the processing of your personal data for specific purposes, such as receiving marketing communications.
- **Contractual Obligation:** When processing is necessary for the performance of a contract

with you, such as providing our products or services.

- **Legal Obligation:** When we are required to process your data to comply with legal obligations, such as tax or accounting regulations.
- **Legitimate Interest:** When the processing is necessary for our legitimate interests, such as improving our services, provided that such interests are not overridden by your data protection rights.

5. Disclosure of Personal Data

ENEO may share Personal Data with third parties for the purposes described below:

- **ENEO Affiliates and Subsidiaries:** we share Personal Data among ENEO-controlled affiliates and subsidiaries.
- **Vendors and Agents:** ENEO may share Personal Data with ENEO's contracted vendors and agents working on our behalf to provide Services, including performing customer support and cloud service providers such as storage providers. In such cases, these vendors and agents must abide by our data privacy and security requirements, are not allowed to use Personal Data they receive from us for any other purpose, and we require them to agree to maintain the confidentiality of Personal Data.
- **Channel Partners:** ENEO has an extensive network of channel partners who help us sell and deliver our products and services. ENEO may share Personal Data with our channel partners for purposes of selling and providing products and services to you. ENEO may also obtain certain Personal Data about you from our channel partners when you purchase products and services from such channel partners. ENEO requires its channel partners to comply with applicable law regarding the Personal Data that we provide to them. Please note, however, that you may have a separate agreement with a channel partner that will control that channel partner's use of your Personal Data, in which case this Privacy Policy does not apply to the information held by that channel partner.
- **Suppliers:** Certain ENEO products incorporate software provided by third party suppliers. In some cases, ENEO may be required to report on sales of such products incorporating such software to those third-party suppliers, and this reporting may include your Personal Information solely to the extent needed to document such sales. ENEO requires its third-party suppliers to treat any such information as confidential.
- **Business Transfers:** In some cases, we may choose to buy or sell assets or become involved in a merger, acquisition or similar transaction. In these types of transactions, customer information (that may include Personal Data) is typically one of the assets that is transferred.
- **Protection of ENEO and Others:** We may disclose or share Personal Data and other information, if we believe in good faith that such disclosure or sharing is legally required, or is necessary to protect our legal rights (including, but not limited to, our intellectual property rights and enforcement of our agreements), the legal rights of others, or the safety and/or security of ENEO, our employees, our customers, or other users.

ENEO does not sell personal data as defined under the CCPA. If this changes in the future, we will update this policy and provide California residents with the option to opt-out of the sale of their personal data via a "Do Not Sell My Personal Information" link on our website.

6. Accessing and Managing Personal Data

ENEO offers choices regarding the collection, use and sharing of Personal Data. You may manage your receipt of marketing and non-transactional communications by following the directions in that communication. You can also cancel your subscription or modify your data by sending an email to data_protection@redborder.com. ENEO retains Personal Data for as long as your account is active or as needed to provide you Services as well as is necessary to comply with our legal obligations, resolve disputes and enforce our agreements.

7. Transfer, Processing and Storage of Personal Data

ENEO is a global company with partners and customers located in many different countries around the world. Personal Data collected by ENEO may be stored and processed in the United States or anywhere ENEO or its affiliates, subsidiaries or service providers maintain facilities. ENEO transfers Personal Data from the European Economic Area and Switzerland to other countries globally. When we do so, we use a variety of lawful transfer mechanisms, including contracts, to comply with applicable law.

When transferring personal data outside of the European Economic Area (EEA), we ensure that appropriate safeguards are in place, including:

- Standard Contractual Clauses approved by the European Commission.
- Binding Corporate Rules or other mechanisms approved by regulatory authorities.

These safeguards are designed to protect your data and ensure it is processed in compliance with GDPR standards.

8. Security of Personal Data

The security of your Personal Data is important to us. ENEO implements administrative, physical, and technical safeguards to protect your Personal Data from unauthorized access, use, modification, or disclosure. Please be aware that no security measures can wholly eliminate security risks associated with Personal Data; keep this in mind when disclosing any sensitive information to us. Please do not disclose your website login credentials to unauthorized users. You are responsible for the security of your login credentials and for any activity that occurs under your account with us. If ENEO learns of a breach of its systems, we may notify you and others in a manner that is consistent with applicable law and/or as agreed by us in writing.

9. Retention of Personal Data

We retain personal data for as long as necessary to fulfill the purposes outlined in this Privacy Policy, unless a longer retention period is required by law. Our criteria for determining retention periods include:

- The duration of our relationship with you.
- Legal and regulatory obligations.
- The necessity to retain data for audits, compliance, fraud prevention, or to enforce our agreements.

10. Personal Data Dissemination

With the specific aim of providing you with our service, we are forced to share your personal data with other companies of Innovalia Group/Grupo Innovalia, so as to centralize our administrative tasks. Particularly, Innovalia Group centralizes the treatment of personal data agreeing with our internal policy, whose purpose is to ensure that any treatment assignment given by third parties is performed with the highest guarantee and according to the current applicable legal regulations.

11. Data Subject's Rights According to the GDPR

According to the Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data (GDPR) you are endowed with the following rights:

- **Right of access.** You shall have the right to confirm that we are treating your personal data and, if yes, to obtain a copy of the mentioned data and full information on the treatment.
- **Right of rectification.** You shall have the right to correct any inaccurate or incomplete data concerning you, and to ensure the certainty of this data.
- **Right to erasure.** You shall have the right to obtain the data erasure without undue delay, where the personal data have been unlawfully processed or where purpose for which they were collected does not longer exist.
- **Right to restriction of processing.** You shall have the right to obtain the restriction of processing where the use of your personal data is unlawful or where the accuracy of your personal data is contested.
- **Right to object.** You shall have the right to object to processing of your personal data where the mentioned data are processed for direct marketing purposes or on grounds relating to your particular situation, unless the processing is necessary for the performance of a task carried out for reasons of public interest.
- **Right no to be subject of individual decision-making.** You shall have the right not to be subject to a decision based solely on automated processing, including profiling, which produces legal effects on you or similarly significantly affects you, unless the decision is necessary performance of a contract between you and us, it is authorized by Union or Member State law, or you have given your explicit consent.

To exercise any of the rights outlined above, please contact us at data_protection@redborder.com, providing sufficient information to verify your identity (e.g., full name and email address used for registration).

You also have the right to lodge a complaint with the relevant data protection authority. In Spain, this is the "Agencia Española de Protección de Datos" (AEPD), which can be contacted via www.aepd.es.

12. California Residents' Rights

If you are a California resident, you have the following rights under the California Consumer Privacy Act (CCPA) and the California Privacy Rights Act (CPRA):

- **Right to Know:** You have the right to request information about the categories and specific pieces of personal data we have collected, used, disclosed, and sold in the past 12 months.

- **Right to Delete:** You have the right to request the deletion of your personal data, subject to certain exceptions.
- **Right to Opt-Out:** You have the right to opt-out of the sale of your personal data. Although ENEO does not currently sell personal data, you can exercise this right if this practice changes in the future.
- **Right to Non-Discrimination:** We will not discriminate against you for exercising your privacy rights under California law.

To exercise any of these rights, please contact us at data_protection@redborder.com or through the contact form on our website.

13. Links to Third Party Websites

ENEO may provide links to other third-party websites and services that are outside our control and not covered by ENEO's Privacy Policy. ENEO is not responsible for the privacy practices or the content of such websites. We encourage you to review the privacy policies on any website you visit whether linked to or not.

14. Public Forums

ENEO offers individuals the opportunity to interact and publish content via discussion forums, blogs, and other means on our website ("Online Communication Tools"). If you use such Online Communication Tools, any information that you disclose becomes publicly available, and could be used to contact you, to send you unsolicited messages, or for purposes neither ENEO nor you have control over. Your use of certain Online Communication Tools may be subject to additional terms and conditions. ENEO is not responsible for the Personal Information or any other information you choose to submit or publish via these Online Communication Tools.

15. Collection of Data From Children

ENEO does not knowingly collect Personal Data from individuals under the age of thirteen (13) or the applicable age of consent in your country. If you believe that ENEO may have collected Personal Data from someone under the applicable age of consent, please email data_protection@redborder.com.

16. Contact ENEO

If you have any questions, concerns or comments about ENEO's Privacy Policy, please contact ENEO via email at data_protection@redborder.com.

17. Updates

ENEO may update this Privacy Policy from time to time. If we make changes to our Privacy Policy, we will post the revised version with an updated revision date. If there are material changes to our Privacy Policy or in how ENEO will use Personal Data, we may provide notification by other means prior to such changes taking effect, for example, by posting a notice on our website or sending you a notification. Your use of ENEO's website and Services following these changes means that you accept and agree to the updated Privacy Policy.