

Privacy Policy

Effective Date: September 3, 2025 **Last Updated:** September 3, 2025

1. Introduction

Welcome Avanza Advisors SL ("we," "our," or "us"), an education and consulting services company incorporated in Barcelona, Spain. Avanza Advisors ™ provides consulting services and proprietary workflow tools to streamline the college and university application process for students. We do not guarantee admission to any institution; we operate solely in an advisory capacity. We are committed to protecting your privacy and ensuring that your personal information is handled in a safe and responsible manner. This Privacy Policy explains how we collect, use, and protect your information when you visit our website at https://www.avanzaadvisors.com (the "Service"), access any of our digital services and applications, including those with independent branding, and third party partner sites.

2. Information We Collect

We may collect the following types of information:

- **Personal Information:** Name, email address, postal address, phone number, and other contact details when you provide them to us.
- **Device Information:** IP address, browser type, operating system, device identifiers, and other technical information.
- **Usage Data:** Information about how you use our website, including pages visited, time spent, and interaction patterns.
- Cookies and Tracking Data: Information collected through cookies, web beacons, and similar tracking technologies.
- **Payment Information:** Credit card details, billing address, and transaction history when you make purchases.
- Service data: Academic records, application details, supporting documentations

3. How We Use Your Information

We use the collected information for the following purposes:

- To provide, operate, and maintain our website and consulting services
- To improve, personalize, and expand our website
- To understand and analyze how you use our website
- To develop new products, services, features, and functionality
- To communicate with you, either directly or through one of our partners
- To process your transactions and manage your orders
- To find and prevent fraud
- To comply with legal obligations

4. Third-Party Services

We do not sell your data. We may utilize third-party services that collect, monitor, and analyze data. These services include:

- **Google Analytics:** We use Google Analytics to analyze website traffic and usage patterns. Google Analytics may collect information such as your IP address, browser type, and pages visited. For more information, visit Google's Privacy Policy.
- **Email Marketing Services:** We use email marketing platforms to send reminders and informational content. These services store your email address and related information.
- **Payment Processors:** We use secure third-party payment processors to handle transactions. These services collect and process payment information securely.
- **Subcontractors and service providers:** We utilize third party software service providers as well as subcontractors (bound by confidentiality agreements) for technology development services. These services are also bound by their own individual privacy requirements.

5. Cookies and Tracking Technologies

We use cookies and similar tracking technologies to track activity on our website and store certain information. Cookies are files with small amounts of data which may include an anonymous unique identifier.

You can instruct your browser to refuse all cookies or to indicate when a cookie is being sent. However, if you do not accept cookies, you may not be able to use some portions of our website.

6. Data Security

The security of your personal information is important to us; please remember, though, that no method of transmission over the Internet or method of electronic storage is 100% secure. While we strive to use commercially acceptable means to protect your personal information, we cannot guarantee its absolute security. Whenever possible, data is stored in encrypted systems with restricted access.

All accounts should be protected by strong passwords, selected by the user. Avanza Advisors ™ will endeavor to enhance security measures, including through the implementation of dual authentication (without guarantee of timing).

7. Your Privacy Rights

We comply with several privacy ordinances based on the location of our incorporation (Barcelona, Spain) as well as the countries and regions in which we operate. We endeavor to comply with all requirements of GDPR (EU 2016/679), Spain's Organic Law 3/2018 (LOPDGDD), and Law 34/2002 (LSICE). Depending on your location, you may have the following rights:

- The right to access your personal information
- The right to correct or update your personal information
- The right to delete your personal information
- The right to restrict processing of your personal information
- The right to data portability
- The right to object to processing
- The right to withdraw consent

GDPR (General Data Protection Regulation)

If you are a resident of the European Economic Area (EEA), you have additional data protection rights under the GDPR. These include:

- The right to be informed about the collection and use of your personal data
- The right of access to your personal data
- The right to rectify inaccurate personal data
- The right to erase your personal data
- The right to restrict processing of your personal data
- The right to data portability
- The right to object to the processing of your data
- Rights in relation to automated decision-making and profiling

If you wish to exercise any of these rights, please contact us at <u>info@avanzaadvisors.com</u>. Users also have the right to file a complaint with the **Spanish Data Protection Agency (AEPD)**. For clients outside the EU (e.g., US, India), we apply equivalent safeguards aligned with international best practices in data protection.

9. International Data Transfers

Your information, including personal data, may be transferred to and maintained on computers located outside of your state, province, country, or other governmental jurisdiction where the data protection laws may differ from those of your jurisdiction. We will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this Privacy Policy.

10. Changes to This Privacy Policy

We may update our Privacy Policy from time to time. We will notify you of any changes by posting the new Privacy Policy on this page and updating the "Last Updated" date. You are advised to review this Privacy Policy periodically for any changes.

11. Contact Us

If you have any questions about this Privacy Policy, please contact us:

- By email: info@avanzaadvisors.com
- On our website: https://www.avanzaadvisors.com/