



GDPR

LIST OF SUB-PROCESSORS



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1. GDPR Compliance: Commitment and Transparency

At Uanataca, a company within the Namirial Group, the privacy and protection of our customers' personal data are a top priority. We are committed to complying with the provisions of the European Union's General Data Protection Regulation (GDPR), which establishes strict standards to ensure security and transparency in personal data processing.

2. What is the GDPR?

The General Data Protection Regulation (GDPR) came into effect in May 2016 and has been enforceable since May 2018. It regulates the processing of personal data and the free movement of such data. The GDPR is directly applicable, meaning it does not require national transposition laws or, in most cases, additional implementation rules.

2.1. Who does it affect?

It applies to companies located in the EU and any other organization that processes data identifying individuals in the EU, even if they do not have offices or servers in the region. It is also applicable to organizations that process data from individuals in the EU and are subject to regulations in third countries.

2.2. What are the main changes?

Under the GDPR, the consent of the Data Subject (the individual identified by the personal data) must be obtained validly and explicitly (tacit consent, also known as opt-out, is no longer valid). The regulation also establishes how this consent must be obtained, defining what information must be provided to the Data Subject (e.g., the retention period must now be disclosed) and how it should be presented (concise, simple, transparent, intelligible, and easily accessible).

Additionally, the GDPR introduces new rights for the Data Subject alongside the ARCO rights (access, rectification, cancellation, and opposition), such as the right to erasure (right to be forgotten) and the right to data portability. Information regarding the categories of data being processed, the type of processing, and the entity performing the processing must be transparent, thereby enhancing the Data Subject's ability to make decisions and maintain control over the personal data entrusted to third parties.

The regulation also includes requirements for reporting data security breaches, with a maximum deadline of 72 hours to notify the Data Protection Authority. The penalty regime has been made more stringent, with maximum fines reaching up to €20 million or 4% of the annual global turnover.

3. How does this affect Uanataca's services?

Uanataca provides trusted electronic services, which involve processing personal data (e.g., email addresses, mobile phone numbers, identity documents). For this reason, Uanataca voluntarily carried out a Data Protection Impact Assessment. This assessment is part of our Information Security Management System, certified under ISO 27001 and utilizing controls defined in ISO 27002.

If users of our trusted electronic services process personal data of third parties (e.g., email addresses, phone numbers, or certified email content), Uanataca is considered a data processor. Under GDPR, this relationship requires a formal contract defining the responsibilities of both parties.

3.1. Who is the Data Controller and the Data Processor?

The CLIENT user of Uanataca is the Data Controller, as they maintain the relationship with the recipient of the communication or document containing personal data. The Controller is responsible for obtaining the data subject's consent, defining the data categories, and determining the purpose of processing. Uanataca, as the Data Processor, follows the Controller's instructions, implements the security measures established by the GDPR, and does not use personal data for purposes other than those specified by the Controller.

3.2. Does Uanataca collaborate with other Data Processors?

Yes. For example, to provide user support, we collaborate with a company that handles phone calls. This company records contact information (when addressing an issue) and therefore becomes a data processor. To communicate with our clients or to export a report to a spreadsheet, we use Google Workspace (G-Suite), the business version of Gmail, and thus delegate the processing of some personal data to Google. To send SMS messages, we use telecommunications operators, which vary depending on the SMS destination. These collaborators of Uanataca are referred to as Sub-Processors.

3.3. Can I get a list of Sub-Processors?

If you are a Data Controller contracting Uanataca's services, you can request a list of Sub-Processors. To do so:

Submit a request at <https://support.evicertia.com>. Indicate if you wish to subscribe to updates regarding changes to the Sub-Processors list.

If you are an individual whose data is being processed, you may also contact us via the same link. However, we are required to forward your request to the Data Controller (our CLIENT), who collects your data, addresses your rights, and provides us with instructions.

4. List of Sub-Processors:

(MRW) LONGITUD 3M, S.L.
AD LÓPEZ Y ASOCIADOS DE EMPRESA, S.A
AMADEO IBARZ CAMPO
AMAZON WEB SERVICES
ANYWAYBAC (Ecuador)
ATLASIAN (JIRA); Atlassian Pty Ltd
BACKBLAZE Inc.
BEWOR TECH S.L
Bit4ID, SRL
CATALINA ANDREA MUNTEAN
Centros de Negocios G-88, S.L
CLX - SINCH UK LTD
DAGRAM TI SL
Datadog, Inc.
EVICERTIA CENAM
EVICERTIA DEL ECUADOR CIA LTDA
FRANCISCO CALDERÓN ÁLVAREZ
Fresbe Iberia, S.L
GOOGLE IRELAND LIMITED / GOOGLE APPS / Google Cloud EMEA Limited
HUBSPOT Ireland Ltd
INFOBIP LTD UK
JIRA-ATLASSIAN Pty Ltd
MAILGUN TECHNOLOGIES, INC.
Microsoft Irelan Operation Ltd. (Azure)
Mobbeel Solutions S.L.
Movitext

NRS - NET REAL SOLUTIONS S.L.
Odoo S.A.
OSBORNE CLARKE ESPAÑA, SLP
PayPal, Europe, Ltd
Signicat
SOCIEDAD ESTATAL CORREOS Y TELÉGRAFOS, S.A., Correos (como
proveedor de HERMA)
Twilio Ireland Limited
Twilio, Inc
TWILIO, INC.
VAR GROUP, S.p.A
Vonage Limited - NEXMO Inc.



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