

Privacy Policy

Last updated: 30 September 2026

1. Data controller

The controller of your personal data is AlexPhone, S.L., with Spanish tax ID (NIF) B09967787 and registered office at Carrer de Francesc Teixidó, 12, 08918 Badalona (Barcelona), Spain, registered with the Barcelona Companies Register, Volume 48279, Folio 2, Sheet B-578540, Entry 5 (hereinafter "AlexPhone").

- Contact for privacy and data protection: rgpd@alexphone.es.
- Customer service: support@alexphone.es · <https://support.alexphone.com>.

We process your data in accordance with Regulation (EU) 2016/679 (GDPR), Spanish Organic Law 3/2018 on the Protection of Personal Data and Guarantee of Digital Rights (LOPDGDD) and Spanish Law 34/2002 on Information Society Services (LSSI). This policy applies to the online store (www.alexphone.com), the customer area (accounts.alexphone.com), the help centre (support.alexphone.com) and the store-investment website (inversion.alexphone.com), hereinafter the "Websites", and to the relationship you have with AlexPhone through them.

2. What data we process

- **Identification and contact details:** name and surname, email address, telephone number and, if you provide it, tax ID for the invoice.
- **Addresses:** shipping and billing.
- **Customer account:** login credentials (your password is stored encrypted and we never see it) and, if you sign in with Google, the name, email and profile photo that Google provides to us.
- **Purchases and after-sales:** orders, products, amounts, invoices, shipments, returns, withdrawals, repairs and warranties, including the device's IMEI or serial number.
- **Payment:** payment is processed by Stripe. AlexPhone does not receive or store your full card number; only transaction details (amount, status, last digits and card brand).
- **Communications:** the content of your enquiries, forms and emails with us.
- **Store investment:** the details you provide in the investment form.
- **Browsing:** the technical and usage data described in section 5 and in the Cookie Policy.

Fields marked with an asterisk (*) in the forms are needed to handle your request; if you do not provide them, we will not be able to do so. The other fields are optional. You warrant that the data you give us is accurate and undertake to inform us of any change.

3. Why we process it and on what legal basis

Purpose	Legal basis (Article 6 GDPR)
Handling your purchase: order, payment, shipping, delivery, invoicing and dealing with issues.	Performance of the sales contract (Art. 6(1)(b)).
Managing your customer account in the customer area.	Performance of the contract (Art. 6(1)(b)).
Handling withdrawals, returns, repairs and warranties.	Performance of the contract and compliance with consumer law (Art. 6(1)(b) and 6(1)(c)).
Issuing and keeping invoices and meeting accounting and tax obligations.	Legal obligation (Art. 6(1)(c)).
Responding to enquiries and requests you make through forms, email or telephone.	Performance of the contract or pre-contractual steps (Art. 6(1)(b)); where there is no contract, legitimate interest in dealing with you (Art. 6(1)(f)).
Handling requests for information about store investment.	Pre-contractual steps at your request (Art. 6(1)(b)).
Sending you the newsletter and marketing communications if you subscribe.	Your consent (Art. 6(1)(a)).
Sending customers marketing emails about products or services similar to those already purchased.	Legitimate interest (Art. 6(1)(f) and Art. 21.2 LSSI). You can object in every message.
Preventing fraud in orders and payments, and protecting forms from bots.	Legitimate interest in the security of the service and in preventing fraud (Art. 6(1)(f)).
Logging technical server errors to maintain the service.	Legitimate interest in the security and proper functioning of the Websites (Art. 6(1)(f)).
Measuring use of the Websites and recording browsing sessions to detect and fix errors (PostHog).	Your consent (Art. 6(1)(a) GDPR and Art. 22.2 LSSI). It is not activated without it.
Keeping proof of your cookie decision.	Legal obligation to be able to demonstrate consent (Arts. 6(1)(c) and 7(1)).
Establishing, exercising or defending legal claims.	Legitimate interest (Art. 6(1)(f)).

Where the basis is legitimate interest, we have assessed that your interests or rights do not override it; you may object at any time (section 8). We do not build profiles for advertising purposes or make decisions based solely on automated processing that produce legal effects for you. The only exception is the anti-fraud analysis that Stripe applies to the payment, which may decline a transaction; if that happens, you may ask us for human review.

4. Minors

You must be over 18 to make a purchase (Terms and Conditions of Sale). The Websites are not aimed at children under 14 and we do not knowingly process their data.

5. Web analytics, session recordings and error logging

Analytics and session recordings (only with your consent)

If you accept analytics cookies, we use **PostHog** to learn which pages are visited, how people browse and where problems appear, and to record the session (what is shown on screen, clicks and scrolling) in order to reproduce and fix faults. Until you accept, no analytics cookie is set and no data is sent.

- Everything you type in forms is always hidden in the recordings.
- Personal data shown on screen (your name, email, photo, addresses and order details) is hidden in your browser before being sent.
- The content of communications with our servers is not recorded, and links containing access codes or tokens are sent with those values hidden.
- If you are signed in, we send only your internal user identifier; never your name, email or telephone number. If you close your account, we delete from PostHog all data associated with that identifier.

- PostHog uses your IP address only to calculate an approximate location (country and city) and then discards it: it is not stored with the analytics data.
- We do not use this data for advertising or combine it with data from other companies. It is hosted in the European Union (Frankfurt, Germany).
- You can withdraw consent at any time from the **"Cookie settings"** link in the footer or, if you have an account, from **My profile** → **Privacy**. We stop collecting data at that moment.

Details of each cookie are given in the Cookie Policy.

Technical error logging

When one of our Websites or systems fails on the server, we log the error (the page without parameters, the technical message and the application version) in order to fix it. This log is sent to PostHog and Better Stack, uses no cookies, does not depend on your cookie choice and is not linked to your identity.

Record of consents

Each time you decide about cookies we store a consent identifier (Consent ID), whether you accepted or rejected analytics, the date and time, the version of the notice, the website and the place where you decided (notice, panel or profile) and, if you were signed in, your user identifier. **We do not store your IP address or browser details** in this record.

6. How long we keep your data

We keep data for as long as necessary for the purpose for which it was collected and, afterwards, blocked for as long as liability may arise or a legal rule requires us to keep it. After those periods it is deleted or anonymised.

Data	Period
Customer account	While you keep it active. You can close it from My profile.
Orders, invoices and accounting records	6 years from the end of the financial year (Article 30 of the Spanish Commercial Code), which includes the 4-year tax period.
Warranties, returns and repairs	During the warranty (legal and commercial) and, afterwards, the limitation period for any resulting claims.
Enquiries and requests without a purchase	As long as needed to handle them and, afterwards, the limitation period for possible claims.
Newsletter and marketing communications	Until you withdraw consent or unsubscribe.
Session recordings	30 days.
Web analytics events	1 year. If you close your account, those linked to it are deleted earlier.
Technical error log	1 year in PostHog and 90 days in Better Stack.
Record of consents	While the decision is in force (24 months at most) and for up to 3 years afterwards, so that we can prove it in the event of a complaint. If you close your account, it is kept without any link to you.

7. Who we share your data with

We do not sell your data. We only share it where necessary to provide the service or where the law requires it:

- **Carriers** (for example DHL), with the details needed to deliver or collect your order.
- **Public authorities, courts and tribunals**, where there is a legal obligation (for example the Spanish Tax Agency).
- **Banks and payment institutions**, to manage payments and refunds.

In addition, the following providers process data on AlexPhone's behalf (data processors), under the contract required by Article 28 of the GDPR:

Provider	Purpose	More information
Stripe Payments Europe, Ltd.	Payment processing and fraud prevention.	stripe.com/en-es/privacy

Provider	Purpose	More information
PostHog Inc. (data in the EU)	Web analytics, session recordings and error logging.	posthog.com/privacy
Cloudflare, Inc.	Content delivery network, security and bot protection for forms (Turnstile).	cloudflare.com/privacypolicy
Supabase, Inc.	Database and authentication for the customer area.	supabase.com/privacy
Railway Corp.	Hosting of the Websites and servers.	railway.com/legal/privacy
Resend (Plus Five Five, Inc.)	Sending transactional emails (confirmations, shipments, support).	resend.com/legal/privacy-policy
Better Stack, Inc.	Technical error logging and system availability monitoring.	betterstack.com/privacy
Google Ireland Ltd.	Sign-in with Google, if you choose it.	policies.google.com/privacy
Business management software providers	Order management, invoicing and customer service.	—

Some of these providers are based in, or process data outside, the European Economic Area (mainly in the United States). In that case the transfer is based on the provider's certification under the EU-U.S. Data Privacy Framework or on the standard contractual clauses approved by the European Commission (Articles 45 and 46 GDPR). You can request a copy of these safeguards at rgpd@alexphone.es.

8. Your rights

- **Access, rectification and erasure** of your data.
- **Restriction** of processing and **objection**, including objection to receiving marketing communications.
- **Portability** of the data you provided to us.
- **Withdrawal of your consent** at any time, without affecting previous processing. For analytics, from "Cookie settings" or from My profile → Privacy; for the newsletter, from the unsubscribe link in each message.

To exercise them, write to rgpd@alexphone.es or by post to AlexPhone, S.L., Carrer de Francesc Teixidó, 12, 08918 Badalona (Barcelona), Spain, stating the right you are exercising. If we cannot identify you, we will ask for a document proving your identity. We will reply within one month, which may be extended by two further months in complex cases.

If you believe we have not handled your request properly, you may lodge a complaint with the **Spanish Data Protection Agency** (AEPD, www.aepd.es).

9. Security

We apply the principles of Article 5 of the GDPR and technical and organisational measures appropriate to the risk: encrypted communications (HTTPS), encrypted passwords, role-based access control to systems, separation of payment data in Stripe and masking of personal data in analytics tools.

10. Changes to this policy

We may update this policy when the processing we carry out or the applicable rules change. The date of the last update appears at the top. If the change is significant, we will inform you through the Websites or by email.

This document is a translation of the Spanish original, provided for convenience. In the event of any discrepancy, the Spanish version shall prevail.