

**comoestas**

# Privacy Policy

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Information about how Tutore Vaughan processes personal data in relation to ComoEstas and related digital services.

ComoEstas is powered by Tutore Vaughan.

# Privacy Policy

Welcome to the Tutore Vaughan SL (**Tutore Vaughan**) privacy policy.

## Who we are and scope of this Privacy Policy

This Privacy Policy explains how Tutore Vaughan SL collects, uses and protects personal data in connection with the ComoEstas website at comoestas.co.uk, webinar registration pages, lead capture forms, demo session requests, Sales follow-up, course onboarding and related services.

ComoEstas is aimed at adults. Our public website, webinar registration flows and course offering are not intended for children or persons under 18 and we do not knowingly collect data relating to children.

This Privacy Policy should be read together with our Cookie Policy, Website Terms of Use, Webinar Terms and, where applicable, ComoEstas Course Terms.

It is important that you read this privacy policy so that you are fully aware of how and why we are using your data.

## Controller

Tutore Vaughan SL is the controller and responsible for your personal data (collectively referred to as "Tutore Vaughan", "we", "us" or "our" in this privacy policy). Tutore Vaughan SL is a company registered in Spain with CIF B-78489820, registered in the Commercial Registry of Madrid on January 4, 1993, Volume 4,720, Folio 45, Sheet M-77516.

If you have any questions about this privacy policy, including any requests to exercise your legal rights (paragraph 0), please contact us using the information set out in the contact details section (paragraph 0).

## The types of personal data we collect about you

Personal data means any information about an individual from which that person can be identified.

We may collect, use, store and transfer different kinds of personal data about you which we have grouped together as follows:

**Identity Data** includes first name, last name, any previous names, username or similar identifier and gender.

**Contact Data** includes email address and telephone numbers.

**Financial Data** includes bank account or payment details.

**Transaction Data** includes details about payments to and from you and other details of products and services you have purchased from us.

**Technical Data** includes internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform, device ID and other technology on the devices you use to access this website.

**Profile Data** includes your username and password, purchases or orders made by you, your interests, preferences, feedback and survey responses.

**Content Data:** Content generated in our services, which may include audio, video, chat messaging content, transcriptions, invitation details, webinar or chat name, or webinar agenda. This may include any personal data shared by you either verbally or in a chat messaging function. Content generated by you may also include your voice and image, depending on the webinar settings, what you choose to share and your computer and system settings.

**Usage Data** includes information about how you interact with and use our website, products and services.

**Marketing and Communications Data** includes your preferences in receiving marketing from us and our third parties and your communication preferences.

**Webinar Registration Data** includes selected webinar session, registration date, attendance status, webinar access information, reminder and confirmation communications, webinar interactions and webinar participation data.

**Lead and Demo Request Data** includes information provided when you request additional information or request a free demo session.

**Optional Learning Profile Data** includes information voluntarily provided by you regarding your interest in learning Spanish, current language level, preferred start date, learning goals or barriers to learning.

**CRM and Sales Follow-up Data** includes records stored in systems such as HubSpot or Dynamics, communication history, sales notes, follow-up actions, lead source information and status updates.

**Course Onboarding and Platform Data** includes lesson booking data, attendance records, learning platform access information, onboarding information and records relating to acceptance of Course Terms.

We also collect, use and share aggregated data such as statistical or demographic data which is not personal data as it does not directly (or indirectly) reveal your identity. For example, we may aggregate individuals' Usage Data to calculate the percentage of users accessing a specific website feature in order to analyse general trends in how users are interacting with our website to help improve the website and our service offering.

### **If you fail to provide personal data**

Where we need to collect personal data by law, or under the terms of a contract we have with you, and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you (for example, to provide you with goods or services). In this case, we may have to cancel a product or service you have with us but we will notify you if this is the case at the time.

### **How is your personal data collected?**

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We use different methods to collect data from and about you including through:

**Direct interactions.** You may give us your Identity, Contact and Financial Data by filling in forms or by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when you apply for our products or services; register your interest with us; create an account on our website; subscribe to our service or publications; request marketing to be sent to you; enter a competition, promotion or survey; attend a webinar or give us feedback or contact us.

**Automated technologies or interactions.** As you interact with our website, we will automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies, server logs and other similar technologies. We may also receive Technical Data about you if you visit other websites employing our cookies. Please see our cookie policy for further details.

**Third parties or publicly available sources.** We will receive personal data about you from various third parties and public sources such as analytics providers such as Google based outside the UK; advertising or marketing providers; search information providers; providers of technical, payment and delivery services; data brokers or aggregators; data from publicly available sources such as Companies House and the Electoral Register based inside the UK.

In particular, depending on how you interact with ComoEstas, we may collect personal data through webinar registration forms, lead capture forms, demo lesson requests, optional questionnaires, webinar platforms, learning platforms and payment providers used in connection with our services.

For example, we may collect personal data:

- Through webinar registration forms, lead capture forms, demo request forms and optional questionnaires or thank-you pages.
- Through eWebinar or other webinar platforms when you register for, attend or interact with a webinar.
- Through learning platform providers used for course onboarding, lesson booking and delivery of online lessons.
- Through payment providers such as Stripe or PayPal where you purchase a course package.

## How we use your personal data

### Legal basis

The law requires us to have a legal basis for collecting and using your personal data. We rely on one or more of the following legal bases:

**Performance of a contract with you:** Where we need to perform the contract, we are about to enter into or have entered into with you.

**Legitimate interests:** We may use your personal data where it is necessary to conduct our business and pursue our legitimate interests, for example to prevent fraud and enable us to give you the best and most secure customer experience. We make sure we consider and balance any potential impact on you and your rights (both positive and negative) before we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law).

**Legal obligation:** We may use your personal data where it is necessary for compliance with a legal obligation that we are subject to. We will identify the relevant legal obligation when we rely on this legal basis.

**Consent:** We rely on consent only where we have obtained your active agreement to use your personal data for a specified purpose, for example if you subscribe to an email newsletter.

### Purposes for which we will use your personal data

We have set out below, in a table format, a description of all the ways we plan to use the various categories of your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data. Please contact us if you need details about the specific legal ground, we are relying on to process your personal data where more than one ground has been set out in the table below.

Purpose/Use	Type of data	Legal basis for processing including basis of legitimate interest
To administer webinar registrations, webinar attendance and webinar interactions	(a) Identity (b) Contact (c) Webinar Registration Data (d) Technical Data	(a) Performance of a contract/service requested by you (b) Legitimate interests in administering and improving webinar services
To respond to lead requests or demo session requests and contact you regarding those requests	(a) Identity (b) Contact (c) Lead and Demo Request Data (d) CRM and Sales Follow-up Data	(a) Legitimate interests (b) Steps requested by you prior to entering into a contract

To create and manage access to online courses, demo lessons and learning platforms	(a) Identity (b) Contact (c) Course Onboarding and Platform Data (d) Transaction Data	Performance of a contract with you
To maintain records of acceptance of Course Terms and related legal documentation	(a) Identity (b) Technical (c) Course acceptance records	(a) Performance of a contract (b) Legal obligations (c) Legitimate interests in evidencing contractual acceptance
To register you as a new customer or webinar attendee	(a) Identity (b) Contact	Performance of a contract with you
To process and perform the contract between us: (a) Manage payments, fees and charges (b) Collect and recover money owed to us	(a) Identity (b) Contact (c) Financial (d) Transaction (e) Marketing and Communications	(a) Performance of a contract with you  (b) Necessary for our legitimate interests (to recover debts due to us)
To manage our relationship with you which will include: (a) Notifying you about changes to our terms or privacy policy (b) Dealing with your requests, complaints and queries	(a) Identity (b) Contact (c) Profile (d) Marketing and Communications	(a) Performance of a contract with you  (b) Necessary to comply with a legal obligation  (c) Necessary for our legitimate interests (to keep our records updated and manage our relationship with you)
To enable you to partake in a prize draw, competition or complete a survey	(a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing and Communications	(a) Performance of a contract with you  (b) Necessary for our legitimate interests (to study how customers use our products/services, to develop them and grow our business)
To administer, protect and develop our business and this website (including developing the provision of our webinar services, training staff, troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	(a) Identity (b) Contact (c) Technical (d) Content	(a) Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise)  (b) Necessary to comply with a legal obligation
To deliver relevant website content and online advertisements to you and measure or understand the effectiveness of the advertising we serve to you	(a) Identity (b) Contact (c) Profile (d) Usage	Necessary for our legitimate interests (to study how customers use our products/services, to develop them, to grow our business and to inform our marketing strategy)

	(e) Marketing and Communications (f) Technical	
To use data analytics to improve our website, products/services, customer relationships and experiences and to measure the effectiveness of our communications and marketing	(a) Technical (b) Usage	Necessary for our legitimate interests (to define types of customers for our products and services, to keep our website updated and relevant, to develop our business and to inform our marketing strategy)
To send you relevant marketing communications and make personalised suggestions and recommendations to you about goods or services that may be of interest to you based on your Profile Data	(a) Identity (b) Contact (c) Technical (d) Usage (e) Profile (f) Marketing and Communications	Necessary for our legitimate interests (to carry out direct marketing, develop our products/services and grow our business)
To carry out market research through your voluntary participation in surveys	f) Marketing and Communications	Necessary for our legitimate interests (to study how customers use our products/services and to help us improve and develop our products and services)

**Direct marketing**

You will receive marketing communications from us if you have requested information from us or purchased services from us and you have not opted out of receiving the marketing.

We may also analyse your Identity, Contact, Technical, Usage and Profile Data to form a view which products, services and offers may be of interest to you so that we can then send you relevant marketing communications.

Where marketing communications are based on consent, users may withdraw consent at any time using the unsubscribe link included in marketing communications or by contacting us directly.

Operational communications relating to webinar registrations, demo requests, purchases or customer service are not considered promotional marketing communications and may still be sent where necessary.

**Third-party marketing**

We will get your express consent before we share your personal data with any third party for their own direct marketing purposes.

**Opting out of marketing**

You can ask to stop sending you marketing communications at any time following the opt-out links within any marketing communication sent to you or by contacting us at any time.

If you opt out of receiving marketing communications, you will still receive service-related communications that are essential for administrative or customer service purposes for example relating to a product/service experience, warranty registration, appointment reminders, updates to our Terms and Conditions or checking that your contact details are correct.

**Cookies**

You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of this website may become

inaccessible or not function properly. For more information about the cookies we use, please see our cookie policy.

### **Change of purpose**

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us.

If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

### **Disclosures of your personal data**

We may share your personal data where necessary with the parties set out below for the purposes set out in the table *Purposes for which we will use your personal data* above.

Webinar platform providers including eWebinar.

CRM and marketing platform providers.

Learning platform providers used to deliver lessons or demo sessions.

Payment providers including Stripe and PayPal.

Cookie consent and analytics providers including Cookiebot/Usercentrics, Google Analytics, Google Ads, Meta and LinkedIn, subject to applicable consent requirements.

Operational support teams located in Poland and Spain within the Vaughan/Tutore group structure.

Third Party service providers who provide technology (including webinar hosting), IT and system administration services.

Third party subcontractors who may assist us in performing the contract we have with you.

Third party public relations and marketing companies who help us to send marketing communications or help us with personal information obtained from our website.

Professional advisers including lawyers, bankers, auditors and insurers based in who provide consultancy, banking, legal, insurance and accounting services.

The UK's HM Revenue & Customs or Spain's Agencia Tributaria (AEAT), regulators and other authorities based in the United Kingdom or Spain who require reporting of processing activities in certain circumstances.

Third parties to whom we may choose to sell, transfer or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this privacy policy.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

We do not sell your personal data.

**International transfers**

We share your personal data within the Tutore Vaughan Group and Tutore Group. This will involve transferring your data outside the UK to our overseas offices in European Economic Area (EEA).

Some technology providers used by us may process or access personal data from countries outside the United Kingdom or European Economic Area, including the United States.

Where international transfers occur, we seek to ensure appropriate safeguards are implemented, including adequacy decisions, Standard Contractual Clauses, the UK International Data Transfer Agreement or UK Addendum where applicable.

**Data security**

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

**Data retention**

How long will you use my personal data for?

We will only retain your personal data for as long as reasonably necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, regulatory, tax, accounting or reporting requirements. We may retain your personal data for a longer period in the event of a complaint or if we reasonably believe there is a prospect of litigation in respect to our relationship with you.

To determine the appropriate retention period for personal data, we consider the amount, nature and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal, regulatory, tax, accounting or other requirements.

Data category	Indicative retention period for Legal to validate
Webinar registration and interaction data	12 months from the webinar registration or last webinar interaction, unless the user becomes a customer or there is another valid reason to retain it longer.
Lead and demo request data	24 months from last meaningful interaction, unless the user opts out earlier or becomes a customer.
Marketing consent and preferences	Until opt-out/withdrawal, plus records needed to evidence consent or suppression.
Customer/course/payment records	For the legally required tax, accounting and contractual period, indicatively 6 years after the customer relationship ends.
Course Terms acceptance records	For the duration needed to evidence the contract and defend claims, indicatively aligned with customer contractual records.
Cookie consent records	According to Cookiebot configuration and legal requirements.

By law we have to keep basic information about our customers (including Contact, Identity, Financial and Transaction Data) for six years after they cease being customers for tax purposes.

In some circumstances you can ask us to delete your data: see paragraph 0 below for further information.

In some circumstances we will anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes, in which case we may use this information indefinitely without further notice to you.

### **Your legal rights**

You have a number of rights under data protection laws in relation to your personal data.

You have the right to:

Request access to your personal data (commonly known as a "subject access request"). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.

Request correction of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.

Request erasure of your personal data in certain circumstances. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.

Object to processing of your personal data where we are relying on a legitimate interest (or those of a third party) as the legal basis for that particular use of your data (including carrying out profiling based on our legitimate interests). In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your right to object.

You also have the absolute right to object any time to the processing of your personal data for direct marketing purposes (see **OPTING OUT OF MARKETING** in paragraph 0 for details of how to object to receiving direct marketing communications).

Request the transfer of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.

Withdraw consent at any time where we are relying on consent to process your personal data (see the table in paragraph 3 for details of when we rely on your consent as the legal basis for using your data). However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.

Request restriction of processing of your personal data. This enables you to ask us to suspend the processing of your personal data in one of the following scenarios:

- If you want us to establish the data's accuracy;
- Where our use of the data is unlawful but you do not want us to erase it;
- Where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or
- You have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.

If you wish to exercise any of the rights set out above, please contact us.

**No fee usually required**

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we could refuse to comply with your request in these circumstances.

What we may need from you

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

Time limit to respond

We try to respond to all legitimate requests within one month. Occasionally it could take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

### **Contact details**

If you have any questions about this privacy policy or about the use of your personal data or you want to exercise your privacy rights, please contact us in the following ways:

Email address: [datos@grupovaughan.com](mailto:datos@grupovaughan.com)

Postal address: Calle Orense, 69 Edificio Eurobuilding 2, 1st floor, 28020 Madrid

Telephone number: +34 911 33 58 31

### **Complaints**

You have the right to make a complaint to the Information Commissioner's Office (ICO), the UK regulator for data protection issues ([www.ico.org.uk](http://www.ico.org.uk)). However, before doing so please make sure you have first made your complaint to us or asked us for clarification if there is something you do not understand. The ICO will expect you to have done this before reviewing your complaint.

Because ComoEstas targets UK users while the controller is established in Spain, users may also have the right to complain to the Spanish data protection authority (AEPD), depending on the circumstances.

### **Changes to the privacy policy and your duty to inform us of changes**

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We keep our privacy policy under regular review.

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us, for example a new address or email address.

### **Webinar-specific information**

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The ComoEstas webinar may be evergreen or automated. Participants will generally not appear on camera or microphone. Webinar interactions, responses and engagement information may be stored and analysed for webinar administration, service improvement and follow-up purposes. Webinar registration data may be managed operationally by support teams located in Poland and Spain.

### **Third-party links**

This website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy policy of every website you visit.

## Cookie Policy

### Who is responsible for this Cookie Policy?

Tutore Vaughan, S.L.U. (“ComoEstas”, “we”, “us” or “our”) is responsible for the cookies and similar technologies used on comoestas.co.uk unless otherwise stated.

Registered office: C/ Orense 69, Edificio Eurobuilding 2, 1st floor, 28020 Madrid, Spain.

Contact: datos@grupovaughan.com

Our website uses cookies to distinguish you from other users of our website. This helps us to provide you with a good experience when you browse our website and also allows us to improve our site.

A cookie is a small file of letters and numbers that we store on your browser or the hard drive of your computer if you agree. Cookies contain information that is transferred to your computer's hard drive.

### Scope of this Cookie Policy

This Cookie Policy applies to:

the public ComoEstas website.

webinar registration pages.

lead capture forms.

thank-you pages and optional questionnaires.

pages relating to free demo lessons and paid online courses.

### Relationship between Cookiebot, Google Tag Manager and Google Consent Mode v2

ComoEstas intends to use Cookiebot as its consent management platform (CMP). Cookiebot is used to manage user cookie preferences and consent choices.

Google Tag Manager (“GTM”) may be used to manage analytics and advertising technologies. GTM itself does not automatically set marketing cookies, but tags deployed through GTM may do so.

Google Consent Mode v2 may also be implemented. Non-essential cookies, analytics and advertising technologies should not be activated unless the user has provided the required consent.

### How can users manage cookies?

When a user first visit comoestas.co.uk, the Cookiebot banner should allow them to:

accept all cookies;

reject all non-essential cookies;

configure cookies by category.

Users should also be able to change or withdraw their consent at any time through a “Cookie Settings”, “Manage Cookies” or equivalent link available in the website footer or in a similarly visible location.

Users can also manage cookies through their browser settings. However, blocking certain cookies may affect how the website, forms or webinar registration tools work.

### Cookie categories expected on ComoEstas

The following table reflects the expected cookie categories and technologies based on the confirmed ComoEstas scope. The final cookie names, providers, purposes and durations should be populated or validated from the Cookiebot scan.

Category	Expected tools / providers	Purpose	Consent position
Strictly necessary	Cookiebot; HubSpot CMS/forms; eWebinar registration technology; hosting/security services.	To store consent choices, deliver the website, protect forms, support webinar registration and maintain website security.	No consent required where strictly necessary.
Preferences / functional	Cookiebot; eWebinar; HubSpot, where applicable.	To remember choices that improve the user experience, such as selected webinar preferences or form-related choices.	Consent required unless the cookie is strictly necessary for a service requested by the user.
Analytics / measurement	Google Analytics 4 via GTM; HubSpot analytics; eWebinar attendance/interaction analytics.	To understand how users use the website and webinar flow, measure form performance, attendance and engagement, and improve the user experience.	Consent required.
Advertising / marketing	Google Ads / Conversion Linker; Meta Pixel; LinkedIn Insight Tag; remarketing or conversion tags deployed through GTM.	To measure advertising campaigns, attribute conversions, build audiences, optimise campaigns and, where permitted, show relevant ads.	Consent required.

### Strictly necessary cookies

These cookies and technologies are necessary for the website, forms, security and consent management to work. They should not be used for advertising or analytics purposes unless a separate legal assessment has been made.

Cookie / technology	Provider	Purpose	Expected duration / note
CookieConsent and related consent records	Cookiebot / Usercentrics A/S	Stores the user's cookie consent choice so the banner does not need to be shown on every visit and so the consent state can be respected.	Normally up to 12 months; final value to be confirmed by Cookiebot scan.
HubSpot CMS/form/security cookies	HubSpot, Inc. / HubSpot Ireland Ltd.	Supports website operation, form rendering, form submission, bot/security checks and prevention of abuse.	To be confirmed by Cookiebot scan.

eWebinar registration/session technologies	eWebinar	Supports webinar registration, session selection, access to the webinar and operational webinar emails or reminders.	To be confirmed by Cookiebot scan.
Hosting / CDN / security cookies	HubSpot, Cloudflare, Amazon Web Services or other hosting/security providers, where applicable.	Protects the website, prevents abuse, manages load balancing and supports secure delivery of the site.	To be confirmed by Cookiebot scan.

**Preference or functional cookies**

These cookies may remember choices that improve the user experience. They should be included in the final declaration only if detected or used in the final implementation.

Cookie / technology	Provider	Purpose	Expected duration / note
Webinar preference/session technologies	eWebinar	May remember webinar-related preferences, selected session, registration state or related webinar settings.	To be confirmed by Cookiebot scan.
Website preference technologies	HubSpot CMS or ComoEstas website scripts	May remember interface or form preferences, where implemented.	To be confirmed by Cookiebot scan.

**Analytics and measurement cookies**

These cookies and technologies help us measure website and webinar performance. They should only be activated where the user has given the relevant analytics consent through Cookiebot, unless Legal confirms a different compliant configuration.

Cookie / technology	Provider	Purpose	Expected duration / note
_ga, _ga_* and related GA4 identifiers	Google LLC / Google Ireland Ltd.	Google Analytics 4 measurement, website traffic analysis, user journey analysis and campaign performance measurement.	Usually up to 24 months; final value to be confirmed by Cookiebot scan.
HubSpot analytics cookies such as __hstc, __hssc, __hssrc, hubspotutk	HubSpot, Inc. / HubSpot Ireland Ltd.	Visitor analytics, form attribution, lead source tracking and CRM-related website measurement.	Often up to 180 days or as detected by Cookiebot.
eWebinar attendance and interaction analytics	eWebinar	Measures registrations, attendance, webinar progress, user responses, interactions	To be confirmed by eWebinar/Cookiebot.

		and demo requests made through the webinar flow.	
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**Advertising and marketing cookies**

These cookies and tags are used to measure and optimise advertising campaigns, attribute conversions, create audiences and support remarketing. They should only be activated where the user has given the relevant marketing/advertising consent through Cookiebot.

Cookie / technology	Provider	Purpose	Expected duration / note
_gcl_a, _gcl_aw, _gcl_dc and related Google Ads / Conversion Linker identifiers	Google LLC / Google Ireland Ltd.	Google Ads conversion measurement, ad click attribution and campaign optimisation.	Usually up to 90 days; final value to be confirmed by Cookiebot scan.
Google advertising cookies such as IDE, test_cookie and related identifiers	Google LLC / Google Ireland Ltd.	Advertising measurement, remarketing, fraud prevention and verification of cookie support.	To be confirmed by Cookiebot scan.
_fbp, _fbc and related Meta Pixel identifiers	Meta Platforms Ireland Ltd. / Meta Platforms, Inc.	Meta Ads conversion measurement, retargeting and audience creation.	Usually up to 90 days; final value to be confirmed by Cookiebot scan.
bcookie, li_gc, lidc, UserMatchHistory, AnalyticsSynchistory and related LinkedIn identifiers	LinkedIn Ireland Unlimited Company / LinkedIn Corporation	LinkedIn Ads measurement, Insight Tag conversion tracking, retargeting and audience matching.	To be confirmed by Cookiebot scan.

**Google Tag Manager and third-party tags**

Google Tag Manager may be used to deploy and manage tags on the website. GTM is not, by itself, a marketing cookie. However, tags deployed through GTM may set or read cookies or similar technologies.

For this reason, all tags inside GTM must be configured consistently with Cookiebot consent categories and Google Consent Mode v2. Before launch, the technical team should test the implementation using Cookiebot, GTM Preview/Tag Assistant and browser developer tools to verify that non-essential cookies are not set before consent.

**International transfers**

Some providers used in connection with cookies and similar technologies may process or access data outside the United Kingdom or the European Economic Area, including in the United States. This may include providers such as Google, Meta, LinkedIn, HubSpot, eWebinar and Cookiebot/Usercentrics, depending on the final technical set-up.

Where required, transfers should be protected by appropriate safeguards, such as adequacy decisions, the EU-U.S. Data Privacy Framework, the UK Extension to the Data Privacy Framework, Standard Contractual

Clauses, the UK Addendum or International Data Transfer Agreement, or other mechanisms approved by Legal.

### **Third-party websites and payment links**

The ComoEstas public website does not include a public checkout or payment button. If, after contact with Sales, a user receives a Stripe or PayPal payment link, the payment page will be hosted by Stripe, PayPal or their payment infrastructure. Stripe and PayPal may use their own cookies and similar technologies on their hosted payment pages. Users should review Stripe's and PayPal's own privacy and cookie information when using those hosted payment pages.

Technical note for implementation: this section assumes that Stripe and PayPal are reached via external hosted payment links sent by Sales. If Stripe elements or PayPal buttons, smart buttons or hosted fields are embedded directly on a comoestas.co.uk page, those integrations may set or read cookies or similar technologies on/through our website and must be added to the Cookiebot scan, banner categories and cookie tables before publication.

### **WhatsApp script at HubSpot site level**

A general WhatsApp tracking script may exist at HubSpot site level. ComoEstas is not expected to include a visible WhatsApp CTA at launch. If no WhatsApp CTA is present and no WhatsApp-related events fire on ComoEstas pages, WhatsApp should not be presented as an active ComoEstas cookie/tracking purpose. If a WhatsApp CTA is later added, the Cookie Policy and Cookiebot classification should be reviewed.

### **Changes to this Cookie Policy**

We may update this Cookie Policy to reflect changes in the cookies, providers, tags or technologies used on comoestas.co.uk, or changes in applicable law or guidance. Where required, users will be asked to renew or update their cookie consent.

### **Contact**

For questions about this Cookie Policy or the use of cookies and similar technologies on comoestas.co.uk, please contact: [datos@grupovaughan.com](mailto:datos@grupovaughan.com).