



Privacy Statement Tesoro CRM

Scope of this statement

This privacy statement describes how **Codificamos S.L.** (“Tesoro”, “we”) as **controller** processes personal data of the **users of Tesoro CRM** (employees of real estate agencies who hold an account) and of persons who contact us.

Important distinction: the data that a real estate agent enters into the CRM themselves about their own clients (buyers, sellers, owners, portal users) is processed by us **as a processor on behalf of the agent**. This statement does not apply to that data; instead, the **data processing agreement (DPA)** between the agent and Codificamos applies; for that data the agent is the controller.

1. Controller

Codificamos S.L., CIF B02641900, Calle Meliso 10, 03739, Jávea, Alicante, Spain.
Registro Mercantil de Alicante, Tomo 4329, Folio 65, Hoja A-171807. Privacy contact: privacy@tesorohq.io.

2. Which personal data we process (of account holders)

- **Account & identity:** name, business email address, phone number, job title, language, profile photo.
- **Company details:** company name, address, **tax number (VAT/NIF)**, billing details.
- **Login & security:** password (hashed), authentication tokens, **IP addresses**, login timestamps.
- **Payment data:** handled via our payment provider (Stripe); we do not store full card details.
- **Support and communication data:** correspondence you conduct with us.
- **Usage data:** technical logs and usage statistics of the Service.

3. Purposes and legal bases (art. 6 GDPR)

Purpose	Data	Legal basis
Providing and managing the account/the Service	account, identity, login	art. 6(1)(b) contract
Billing and payments	company, tax and payment data	6(1)(b) contract + 6(1)(c) legal (tax) obligation
Support and communication about the Service	contact, support data	6(1)(b) / 6(1)(f) legitimate interest
Security, fraud prevention, error monitoring, improvement	login, IP, logs	6(1)(f) legitimate interest (a secure, working service)
Marketing / product updates (where applicable)	name, email	6(1)(a) consent (opt-in; revocable)
Complying with legal obligations	relevant data	6(1)(c)

4. Sub-processors / recipients

We do not sell personal data. We engage the following service providers for our own processing activities as controller:

Service provider	Function	Location	Mechanism
Stripe	payment/billing processing	US	EU-US DPF + SCCs
Mailgun (Sinch)	transactional email (account, support)	EU	within the EEA
MongoDB Atlas	storage of account data	EU (Madrid)	within the EEA
Cloudflare	hosting / CDN	EU/Cloudflare	DPF
Hetzner	EU hosting (self-hosted components)	EU (Germany)	within the EEA

Service provider	Function	Location	Mechanism
GlitchTip (self-hosted)	error monitoring	EU (Germany)	within the EEA

(For the processing of the agent's end-client data, a separate sub-processor list applies in the DPA.)

5. International transfers

Your data is in principle processed **within the EEA**. For service providers with a US parent company (such as Stripe, Cloudflare and Mailgun/Sinch), insofar as incidental access may take place, the **EU-US Data Privacy Framework** and/or **standard contractual clauses (SCCs)** apply. A copy of the safeguards is available on request.

6. Retention periods

- **Account data:** for the duration of the agreement and 12 months thereafter.
- **Billing/tax data:** statutory retention period (Spain: typically 6 years).
- **Technical logs / IP:** 90 days.
- **Error monitoring:** 90 days.

7. Your rights (GDPR)

You have the right to **access, rectification, erasure, restriction, portability and objection**, and the right to **withdraw consent previously given** (without retroactive effect).

Requests via privacy@tesorohq.io.

You also have the right to lodge a complaint with the supervisory authority. In Spain this is the **Agencia Española de Protección de Datos (AEPD)**, C/ Jorge Juan 6, 28001 Madrid, www.aepd.es. You may also complain to the supervisory authority in your own EU country of residence.

8. Cookies

The application uses exclusively **functional/strictly necessary** cookies (session/authentication, language preference).

9. Officer & automated decision-making

- **DPO:** a data protection officer is not legally required for these processing activities; questions can be directed to privacy@tesorohq.io.
- **Automated decision-making:** we do not make decisions with legal effect based solely on automated processing. The AI feature of the Service is limited to translating/rewriting real estate texts (see the AI governance annex).

10. Changes

This statement always applies in its **current, published version**, which applies to the processing. We reserve the right to amend the content. In case of significant changes we will inform you via the Service or by email. The current version always bears a date.

11. Applicable law & contact

Spanish law. Questions or requests: privacy@tesorohq.io – Codificamos S.L., Calle Meliso 10, 03739, Jávea, Alicante, Spain.

Codificamos S.L.