

## INTEGRAL NOTICE OF PRIVACY

### 1.1 Responsible for Data Processing

Any reference in this document to "TRUORA", "we", "our (s)" or "us" refers to the company Truora S.A.S which is responsible for the treatment of your personal data in accordance with the Privacy Policy and this Comprehensive Privacy Notice (hereinafter, the "**Data Controller**") in Colombia, Mexico, Brazil, Chile, Costa Rica, Argentina and in the other countries where it operates, with main office at Carrera 12 # 90-20, Bogotá, email [contact@truora.com](mailto:contact@truora.com) and identification number NIT 901189979-5. This privacy notice is addressed to our clients and users of TRUORA platform, and the services we provide are intended to define the scope and general conditions of the treatment so that you can be informed taking your decisions regarding the use of your personal data and to maintain control and disposition over them. TRUORA hereby wishes to transparently inform the purposes of the processing of your data to strengthen your level of trust.

## 2. PERSONAL DATA OBJECT OF THE TREATMENT THAT WE COLLECT

We collect information that belongs to the following general categories:

### 2.1 Data we collect to fulfill the necessary purposes

**Personal identification data:** Full name, place and date of birth, unique population registration key (national id number), nationality, copy of your passport, copy of your voting credential.

**Contact information:** address, email, phone number.

**Labor data:** Jobs developed during your working life from the beginning to the date.

**Biometric data:** The image of your face to be able to perform facial recognition, the sound of your voice to achieve recognition of your voice, the image of your iris to be able to perform iris recognition, your handwritten signature to be able to perform recognition signature, fingerprints.

**Communication data:** Includes the data provided in any communication with TRUORA, or with other clients.

**Electronic registration data:** Data of your contracting of services on our Site, IP address with which you access the Site, user preferences, type of browser, activity on the site.

### 2.2 Data you can choose to provide to us later

You can choose to provide us with additional personal data to obtain a better user experience when using the TRUORA Platform, for which, when you decide to do so, we require at that time your express consent for the processing of your additional data in the terms of this document.

**Profile data:** Gender, preferred language for communications, city of residence and personal description. Some of this data, as indicated in your Account, is part of your public profile page and will be publicly visible, unless you decide otherwise when creating said profile.

**Address Listing Contact Information.** You can choose to import the contacts from your Address List or enter your contact information manually in order to access certain functions of the TRUORA Platform, such as encouraging them to use TRUORA, by sharing this data you declare that you have with the consent of the owners and that will provide them with a copy of this comprehensive privacy notice or, where appropriate, indicate that they can consult it on our page [www.truora.com](http://www.truora.com).

Truora does not request or collect wealth data such as your bank account data or other forms of payment used on the payment platform that is operated by an independent third party. TRUORA does not request or collect sensitive personal data.

### **2.3 Information that we automatically collect from your use of the TRUORA Platform**

By using the TRUORA Platform, we automatically collect information, including your personal data and those of third parties, about the services you use and how you use them. This information is necessary for the correct execution and to provide you with the services you request, for the fulfillment of our legal obligations and taking into account our legitimate interest in being able to provide and improve the functionalities of the TRUORA Platform.

### **2.4 Information we collect from third parties**

TRUORA may collect information from third parties, including personal data, that you provide about third parties each time you make your inquiry at TRUORA, or obtain information from other sources and combine it with that which we collect through the TRUORA Platform. We do not supervise or assume responsibility regarding the way in which the client provides information from third parties, how they process this personal data and any request for information regarding the disclosure of such personal data by the Client should be directed to the client. The Client must inform third parties whose personal data discloses to TRUORA the content of this privacy notice, indicating the site where they can consult it [here](#).

- **Identity information**, such as name, address, phone, email, date of birth.
- **Background information**. In relation to clients, they may, to the extent permitted by applicable law and subject to their consent, where appropriate, obtain the local version of the history of police, criminal, or inclusion in lists of sex offenders. We may use your information, including full name and date of birth, to obtain such reports.
- **Other sources**. To the extent permitted by applicable law, we may receive supplemental information about you, such as demographics or fraud detection help data and security issues, from third-party service providers or partners and combine it with information from the that we have on you.

For example, we may receive the results of criminal background checks (with your consent, where applicable) or fraud warnings from identity verification services for the purposes of our efforts to prevent fraudulent practices and risk assessment. We may receive information about you and your activities inside and outside the TRUORA Platform through our partners or information about the experiences and interactions you have had through our network by associated advertisers.

### **2.5 Data of minors.**

Our websites and applications are not directed at anyone under the age of 18 and we do not knowingly collect any personal information directly from anyone under the age of 18. If you believe that we process personal information relating to a child inappropriately, we take this very seriously and urge you to contact us using the information provided in the "Contact Us" section below.

### **2.6 Data in sources of public access.**

TRUORA obtains data through remote or local means of electronic, optical and other technology communication in sources of public access, that is, in sources to which anyone can have access and which include telephone directories, newspapers, gazettes, official bulletins and social media, all in accordance with applicable regulations.

Mexico: In the terms of article 10 fraction II, of the Federal Law on Protection of Personal Data Held by Private Parties, TRUORA does not require your consent to obtain personal data from publicly accessible sources.

## **3. PURPOSES OF THE TREATMENT**

Below, you will find a description of the purposes for which TRUORA will use the personal data it collects under the terms of this.

### **3.1 Necessary purposes.**

TRUORA will process your personal data for the following necessary purposes, always taking into account the safety of its customers:

- Fraud prevention.
- Compliance with the obligations derived from the service contract concluded with clients Truora user account management.
- Identity verification.
- Document validation.
- Obtain information related to education, work experience, participation in illegal activities, legal proceedings.
- Send service-related communications by email, data message, or mail.
- Provide customer support services.
- Address clarifications, complaints and investigations.
- Monitoring of payments and, where appropriate, collection management.
- Provide your data to third parties to comply with the obligations derived from the service contract concluded.
- Analyze commercial behavior.
- Make inquiries and market and marketing studies.
- Prepare your consumption profile.
- Generate risk reports.

### **3.2 Unnecessary purposes.**

Likewise, we will use your personal data for various purposes that are not necessary but that allow us to offer you better products and services according to your preferences and needs and which include:

Invite you to participate in special events, giveaways, and promotions.

You may declare that you do not want your personal data to be processed for purposes not necessary by means of a written notice addressed to TRUORA SAS at the email [contact@truora.com](mailto:contact@truora.com) attaching the following information, full name, address, copy of your official identification, email and telephone to contact him and indicating in the reference the object of the communication. Refusal to process your personal data for unnecessary purposes does not constitute a reason for TRUORA to deny you the services it offers.

As established in article 14 of the Regulation of the Federal Law on Protection of Personal Data Held by Private Parties when the privacy notice is not made known to the owner directly or personally, the owner will have a period of five (5) days for you to express your refusal for the treatment of your personal data for unnecessary purposes, if you do not express your refusal it will be understood that you have given your consent for the treatment of your data for such unnecessary purposes, unless proven otherwise .

## **4. IN WHAT WAY DO WE COLLECT INFORMATION**

We may use, store and process personal information (1) to provide, understand, improve and develop the TRUORA Platform, (2) to create and maintain an environment of trust and with better security conditions, (for example, to comply with our legal obligations and ensure compliance with TRUORA policies), and (3) provide, customize, measure and improve our advertising and marketing.

**4.1 Provide, improve and develop the TRUORA Platform:** We can use personal information to provide, improve and develop the TRUORA platform:

- Allow you to access the TRUORA Platform and use it.
- Operate, protect, improve and optimize the TRUORA Platform and TRUORA's experience, for example, through analysis and research.
- Provide customer service.
- Send you service or support messages, updates, security alerts, and notifications.

We process this personal information for these purposes to account for our legitimate interest in improving the TRUORA Platform and the experience of our Members in it, and whenever necessary for the proper execution of the contract entered into with you.

**4.2 Create and maintain an environment of trust and with better security conditions:** We can use personal information to create and maintain a reliable and secure environment:

- Detect and prevent fraud activities or mismanagement of information.
- Conduct safety investigations and risk assessments.
- Verify or authenticate information or identifications that you have provided
- Check databases and other sources of information, including criminal and police background checks, to the extent permitted by applicable law and subject to your consent, where appropriate.
- Comply with our legal obligations.
- Resolve any controversy arisen with any of our Members and demand the fulfillment of our contracts with third parties.

We process this personal information for these purposes, given our legitimate interest in protecting the TRUORA platform, to measure the proper performance of our contract with you, and to comply with applicable laws.

**4.3 Providing, Personalizing, Measuring, and Improving Our Advertising:** We may use personal information to provide, personalize, measure, and improve our advertising and marketing as follows:

- Send you promotional messages, marketing content, advertising and other information that may interest you based on your preferences (including information related to TRUORA or to partner campaigns and services), as well as advertising through social communication platforms.
- Personalize, measure and improve our advertising.
- Invite you to relevant events and opportunities.

We will process your personal information for the purposes listed in this section given our legitimate interest in carrying out marketing activities to offer you products or services that may be of interest to you.

## **5. Use of Cookies**

On our Website we use "Cookies". Cookies are small data files that are stored on the hard drive of your computer equipment or the electronic communication device that you use when you browse our site and allow the exchange of status information between our Site and your browser. The "status information" may reveal means of session identification, authentication, means of authentication or your preferences as a user, as well as any other data stored by the browser regarding our site.

You can take steps to limit tracking by deleting cookies from your computer's hard drive and configuring your browser to block all cookies or warn you before a cookie is stored. If you disable cookies, you may not be able to take full advantage of the Services because they may not function properly without cookies. Truora uses various cookie-based analysis services. Editing your tracking and cookie preferences will limit analytical tracking. To prevent Google Analytics from using your information for analysis, as an example, you can install the Google Analytics opt-out plugin by clicking here

Promotional Emails: Subject to any restrictions under applicable laws, we may send you periodic promotional or informational emails. You can opt out of receiving such communications by sending us an email at [contact@truora.com](mailto:contact@truora.com). Please note that it may take up to 10 business days for us to process opt-out requests. If you choose not to receive emails about recommendations or other information that we think may interest you, we may still send you emails about your account or any services that you have requested or received from us. you can re-enroll.

## **6. Cloud computing.**

In the treatment of your personal data TRUORA uses the services of third parties for the storage of the same in the so-called cloud computing, and for this it has verified that said service providers have and apply personal data protection policies that comply with the established in the LPD and its Regulations, which as part of the provision of their services cannot assume ownership or ownership of the personal data with respect to which they provide the service, which will maintain the confidentiality of all the personal data they receive as part of the services they provide us; that they have mechanisms to publicize their privacy policy, the changes to it, the conditions of the service they provide, which allow TRUORA to limit the processing of data for the purposes of our comprehensive privacy notice, which have the adequate security measures for the protection of the personal data on which they provide the services and that at the end of the services provided can guarantee the deletion of the personal data they have received; that they have the necessary mechanisms to prevent access to personal data to people who should not have access to it.

## **7. TRANSFERS, REFERRALS AND DISCLOSURE OF INFORMATION.**

### **7.1 Advertising and social media; Share with your consent.**

TRUORA transmits your personal data to its subsidiaries, affiliates and group companies, as well as to those in charge of the treatment of your data and such referrals, whether national or international, do not require your consent. Companies in the TRUORA group will receive the privacy notice and have the same or similar privacy policies and procedures as TRUORA, and have implemented mechanisms to maintain confidentiality and prevent unauthorized disclosures of your data.

- 7.1.1 Collection companies- so that, where appropriate, they collect any amount owed to TRUORA for the services provided.
- 7.1.2 Courier companies: that can deliver the reports derived from the services contracted with TRUORA.
- 7.1.3 Marketing companies.
- 7.1.4 Companies that manage social networks.

When you have given your consent, we may share your information, including your personal data, as described at the time you gave your consent, such as when you authorize a third-party application or website to access your Account. TRUORA, as well as giving us authorization to manage and disclose the information of third parties that you provide us with. Being the client responsible for the information you provide us, and accepting that you have the express authorization of the owner of the data for TRUORA to process them in the terms of this privacy notice that you must have provided to the owner with prior to obtaining your personal data.

We transfer your email address with social media platforms, to generate leads, drive traffic to our websites, or otherwise promote our products and services or the TRUORA platform. These processing activities are based on our legitimate interest in undertaking marketing activities to offer you products or services that may be of interest to you.

TRUORA does not control or supervise the social media platforms with which we may share your personal information. TRUORA does not control the data of third parties provided. Therefore, any questions about how your social media platform service provider processes your personal information should be directed to that provider so we suggest that you consult the appropriate privacy notice. And any clarification from the third party will be addressed to you.

7.2 Regulatory compliance, response to legal requirements, prevention of damages and protection of our rights.

TRUORA may disclose your information, including your personal data, to courts, security forces and bodies of the State or government agencies, government authorities, administrative, tax authorities, or authorized third parties, if we are obliged or authorized to do so in accordance with right or in the event that such disclosure is justifiably necessary: i) to fulfill our legal obligations, ii) to comply with legal processes and respond to claims or demands filed against TRUORA; iii) to respond to valid requests related to investigations by the police or any authority with powers to do so, or to alleged or alleged illegal activities or activities of any other nature that could expose us, you or any of our users to legal liability; iv) to demand compliance with our terms or v) to safeguard the rights, property or personal safety of TRUORA, its employees, its Members or members of the public.

These provisions may be necessary to comply with our legal obligations, for the protection of the vital interests of you or another person or for the purposes of our legitimate interest or that of a third party in keeping the TRUORA platform safe, preventing damage or crime. , compliance or defense of legal rights, facilitating the collection of taxes and the prevention of tax fraud or the prevention of damages.

### **7.3 Service providers**

TRUORA uses various third party service providers to help us provide services related to the TRUORA Platform. Service providers may help us, for example, to: i) verify your identity or authenticate your identification documents; ii) collate information with public databases; iii) carry out criminal or police background checks, prevention of fraudulent practices and risk assessment; iv) perform product development, maintenance and error resolution tasks; v) allow the provision of TRUORA Services through third-party software platforms and tools (for example, through integration with our APIs), or vi) provide customer service, advertising or payment services, or ( vii) process, handle or evaluate insurance claims or other similar claims (such as claims under TRUORA's host warranty).

TRUORA will have to share your information and third parties information under your authorization, including your personal data, to guarantee the proper execution of the service. TRUORA may use a new supplier without prior written, specific or general authorization. For this case, we will be able to decide whether or not to inform the person responsible for any planned change in the incorporation or substitution of other suppliers.

#### **7.4. Information provided to business customers.**

If you have linked your TRUORA account to the TRUORA account of a company or other organization ("company"), added your work email address, or have a reservation made through another party (such as the prospective employer or other entity ) or used a coupon in a capacity in connection with a business (for example, using a coupon to pay for accommodation for a business-related event, such as job placement, orientation, meetings, etc.) through one of our Business products, which Company will have access to your name, contact details, permissions and roles, and other information as necessary to allow you and the company's use of such Business products.

#### **7.5 Aggregated Data**

We may also share aggregated data (information about our users that we combine so that it no longer identifies or alludes to a specific user) and other anonymized information necessary for regulatory compliance, for the purposes of sector and market analysis, search, elaboration of demographic profiles, marketing, advertising and other commercial purposes.

The before mentioned third parties may process Personal Data in compliance with the instructions of TRUORA and / or its affiliates or subsidiaries, always within the scope of this privacy notice or make decisions about them as part of the provision of their services. In any case, TRUORA and / or its affiliates or subsidiaries will select reliable suppliers that commit themselves, through a contract or other legally binding and permissible means, to establish the necessary security measures to guarantee an adequate level of protection for their Personal Data.

TRUORA and / or its affiliates or subsidiaries will require external providers to comply with these standards or to guarantee the same levels of protection that TRUORA implements during the processing of your personal data. The third parties selected by TRUORA will have access to your Personal Data for the sole purpose of performing the tasks specified in the applicable service contract. If a TRUORA entity concludes that a supplier is not complying with these obligations, it will immediately take the appropriate actions.

By means of the authorization that you grant us at the conclusion of the reading of this comprehensive privacy notice, you accept the transfer of your Personal Data under the terms of this. Likewise, you can express your refusal to transfer your personal data by checking the box below:

I do not authorize my personal data to be shared with the following third parties

#### **8. Means to exercise the rights of access, rectification, cancellation and opposition (ARCO) before TRUORA.**

We remind you that in terms of Personal Data Protection, you can exercise your rights of petition or claim, which must be formulated in writing to Truora at the email [contact@truora.com](mailto:contact@truora.com), with the identification of the owner, the description of the facts that they give place to the claim, the address, and if it were the case, accompanying the supporting documents that they want to assert. In the event that the writing is incomplete, the interested party will be notified to correct the flaws. After one month has elapsed from the date of the request, without the applicant submitting the required information, it shall be understood that the claim or petition has been withdrawn.

The maximum term to attend the request or claim will be fifteen (15) business days from the day following the date of receipt. When it is not possible to attend the request within said term, the interested party will be informed, stating the reasons for the delay and indicating the date on which their request will be met, which in no case may exceed eight (8) business days following the expiration of the first term.

THE CLIENT may exercise the ARCO rights in accordance with the following:

**Access:** You can request information about your Personal Data used by TRUORA, which will be sent to you by email in a PDF file or by mail with simple copies of your data. Likewise, if you have an electronic account on the TRUORA site, you can access its data at any time by entering with your username and password.

**Rectification:** You can request that any of your data taken by Truora be corrected, in the event that we have any inaccurately, incompletely, erroneously, erroneously registered or that is not updated. However, the information issued in the identity validation report will not be corrected or changed, since the basis of the State is the source of information and the modification or rectification of these data is foreign to Truora.

**Cancellation:** You can ask TRUORA to cancel your data when you consider that we are not using it in accordance with the applicable privacy provisions, as long as there is a cause that justifies such action and you have no contractual or legal relationship with TRUORA or any pending obligation to fulfill .

**Opposition:** In case you decide to oppose the use of your personal data for specific purposes. TRUORA will respond to your request within a period that will not exceed twenty (20) days from the date you received your request and if it is appropriate, it will be effective within fifteen (15) days after the date on which you let's communicate the answer. TRUORA may extend the aforementioned terms once for an equal period, when justified by the circumstances of the case. The information can be obtained under the same means of contact set out above.

### **Mechanism to revoke consent to the processing of your personal data**

Likewise, we inform you that you can revoke your consent to the processing of your personal data at any time, in order for TRUORA to stop using them. It is important that you consider that the revocation of your consent to the processing of your data will make it impossible for TRUORA to continue fulfilling the necessary purposes described in this Privacy Notice, therefore, for this purpose, you must send a letter to the email to [contact@truora.com](mailto:contact@truora.com), in your letter you must include your full name, address, email where TRUORA can send you the answer, phone number to which we can call you, copy of an official identification (ID card, voting card, passport, military card ).

The maximum term to attend the request or claim will be fifteen (15) business days from the day following the date of receipt. When it is not possible to attend the request within said term, the interested party will be informed, stating the reasons for the delay and indicating the date on which their request will be met, which in no case may exceed eight (8) business days following the expiration of the first term.

You can exercise the rights described in this section in the way that has been described.

Additionally, we inform you that you can limit the use and disclosure of your personal data by requesting its registration in the Public Registry to Avoid Advertising by the Federal Consumer Attorney in Mexico ("PROFECO") so that your personal data is not used. to receive advertising or promotions from third parties. For more information you can consult the PROFECO website or contact them directly. It only applies to Mexico.

### **8.1 Data access and portability**

In some jurisdictions, applicable law may give you the right to request copies of the personal data we store about you. You may also request copies of the personal information you have provided to us in a structured, commonly used and machine-readable format and / or ask us to forward such information to another service provider (to the extent technically feasible).

### **8.2 Claims submission**

You have the right to file complaints about our data processing activities by filing a complaint with our data protection officer who can be contacted in the section [contact@truora.com](mailto:contact@truora.com)

In Mexico, you can file a complaint or denunciation with the National Institute of Transparency, Access to Information and Protection of Personal Data and visit the page [www.inai.org.mx](http://www.inai.org.mx) for more information.

In Colombia, you can file a complaint or complaint with the Superintendence of Industry and Commerce and visit the page <https://www.sic.gov.co/> to obtain more information.

In Brazil, you can file a complaint or denunciation with the National Authorities of Proteção de Dados  
Fonte: Agência Senado

## **9. SECURITY**

We continuously adopt and update administrative, technical and physical security measures to contribute to the protection, confidentiality and assurance of your personal data to prevent it from being destroyed, damaged, lost, altered or modified without authorization or being accessed without authorization. Excuse me. Firewalls, data encryption, and information access controls are some of the safeguards we use to protect your information. If you know or have reason to believe that your TRUORA Account credentials have been lost, stolen, misappropriated, or are at risk for any other reason, or if you know or suspect that your TRUORA Account has been used without authorization, Contact us by following the instructions in the Contact section below. In the event of a security breach of your personal data, TRUORA will promptly inform the affected owners so that they can take the corresponding measures, indicating at least the nature of the incident, the personal data involved, the recommendations regarding the measures they can take. to protect your interests, immediate corrective actions and the means where you can obtain more information about it.

## **10. MODIFICATIONS TO THE PRIVACY NOTICE**

TRUORA reserves the right to modify the Privacy Notice at any time in accordance with this provision. If we make changes to it, we will publish the revised version of it on the TRUORA Platform and update the "Last update" date, which appears at the beginning of this document. Likewise, you will be subject to the privacy notice in force from the moment you accept this. We suggest you visit our site frequently to verify the current privacy notice.

If at any time the identity of the person responsible for this privacy notice changes, TRUORA requires the collection of sensitive, patrimonial or financial personal data, the necessary purposes change or the transfer conditions are modified, we will make a new privacy notice available to you in accordance with the LPD, its Regulations and the guidelines of the privacy notice.

## **11. CONTACT US**

If you have any questions or complaints about this Privacy Notice or about TRUORA's personal data processing practices, you can contact us by email at: [contact@truora.com](mailto:contact@truora.com)

**Fecha de última actualización:**

23/03/2020