

## Privacy policy

### 1. INTRODUCTION

Thanks for using TRUORA! Your trust is the most important thing for us and we are committed to protecting the privacy and security of your personal data, and those of third parties regarding whom we are consulted. We have a dedicated privacy team that is committed to protecting all of the personal data we collect and ensuring that it is handled properly in all the countries in which we provide services.

This Privacy Policy describes the way in which we carry out the treatment of your personal data, that is, how we obtain, collect, use, process, store and disclose it, including your access data to the TRUORA Platform and the payment services. This privacy policy describes our privacy practices for all the websites, platforms and services that link to it. Please read our privacy policy. In order to use our site and receive the services we provide, you need to read and, where appropriate, accept our Comprehensive Privacy Notice, which can be found at [www.truora.com](http://www.truora.com)

### 2. PERSONAL DATA AND COLLECTED INFORMATION

We collect information and personal data belonging to the following general categories.

#### 2.1 Data you provide us

##### 2.1.1 Necessary information to use the Truora platform.

We request and collect the following personal data about you when you use the TRUORA Platform. These data are necessary for the correct execution of the contract formalized between you and us and allow us to fulfill our legal obligations. Without these data, we may not be able to provide all the services requested.

- **Account information.** When entering to have a consultation at TRUORA, we require certain information such as your name, surname, email address, date and place of birth, national identification and country of origin.
- **Identity verification information.** To continue creating and maintaining a trusted environment we can collect identity verification information like national ID, passport, voting credential, and other authentication data such as driver license and license plate.
- **Biometric data.** To unequivocally verify your identity TRUORA will put at your disposal mechanisms and technological applications that allow you to provide us with your biometric data to obtain immediate recognition as facial and voice recognition.
- **Communication between Truora and other members.** When communicating with Truora or using the Truora platform to communicate with other members, we gather information about these communications and any other data you chose to provide.

##### 2.1.2 Information automatically collected by the use of the Truora platform.

When using the Truora platform, information is automatically collected, including your personal data and those from third parties, regarding the type of used services and how they are being used. This information it's necessary for our right execution and to provide the services needed 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.

##### 2.1.3 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 [www.truora.com](http://www.truora.com).

- **Identity information.** Such as name, national identification document, 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 criminal listing. We may use your information, including your full name and national identification number, 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.

## 2.2 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.

## 2.3 Data in publicly accessible sources.

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. In 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. SECURITY MEASURES COMPLIANCE WITH THE LAW.

In compliance with the provisions of the Federal Law on Protection of Personal Data Held by Private Parties (the "LFPD"), its regulations, the guidelines of the privacy notice and other applicable legal provisions, TRUORA has implemented administrative security measures to establish at the organizational level, the management, support and review of the security of your personal data, the identification and classification of information, as well as the awareness, education, and training of your staff in the field of personal data protection. Likewise, TRUORA has established physical security measures using state-of-the-art technology to prevent unauthorized access, damage or interference to its physical facilities, critical areas, equipment, and information, to protect mobile computing equipment from any unauthorized access and has also implemented technical security measures so that access to our databases is only carried out by authorized users. Therefore, in the event of a violation of your personal data, we will analyze the causes for which said violation occurred and implement the corrective, preventive and improvement actions necessary to make the necessary security adjustments to reduce the risk of a new infringement.

## 4. GUIDING PRINCIPLES FOR THE PROCESSING OF YOUR PERSONAL DATA.

In terms of the LFPD and its Regulations, TRUORA processes your data in accordance with the principles of legality, consent, information, quality, purpose, loyalty, proportionality and responsibility as required by applicable law.

- **Lawfulness:** We obtain your data in accordance with the applicable legislation both in Mexico and internationally.
- **Consent:** We obtain your consent to the treatment of your personal data in a free, specific and informed manner, except when it is not required pursuant to article 10 of the LFPD.
- **Information:** In our comprehensive privacy notice we provide you with information regarding the data we obtain, the purposes of its treatment and other requirements established by the LFPD in order for you to exercise your rights of informative self-determination, privacy and protection of

personal data. This principle is materialized when TRUORA makes the privacy notice available to you, whether it be comprehensive, simplified or short.

- **Quality:** We seek that the personal data object of treatment is exact, complete, pertinent, correct and updated to comply with the necessary purposes indicated in our comprehensive privacy notice. By obtaining personal data directly from the owner, we comply with this principle and when we obtain your personal data indirectly, we verify through various sources that they are accurate, complete, pertinent, correct and updated to guarantee the veracity of the information and that you are not seen. affected by said situation.
- **Purpose:** TRUORA only treats your personal data for the purposes specified in our comprehensive privacy notice and for this reason they have been clearly and determinedly established, distinguishing between the necessary purposes and those that are not.
- **Loyalty:** TRUORA does not use deceptive or fraudulent means to collect personal data, and we conduct ourselves at all times in good faith and with the utmost diligence regarding the information provided by our clients and users, maintaining reasonable expectations of respect for the privacy of the holders of the data in the understanding that we will carry out the treatment of their data as agreed.
- **Proportionality:** We only carry out the processing of personal data that is necessary, appropriate and relevant to the necessary purposes indicated in our comprehensive privacy notice.
- **Responsibility:** TRUORA has established policies and procedures for handling personal data within its organization that are mandatory and in accordance with the best international practices that allow us to process your personal data responsibly. Likewise, we carry out the training, updating and awareness of our staff regarding the applicable provisions and obligations regarding personal data protection and we have established internal supervision and surveillance systems to verify compliance with our policies, which are periodically reviewed to determine if any modification is necessary. At TRUORA we have established, as indicated in our comprehensive privacy notice, mechanisms to receive and respond to the doubts and complaints of the holders of personal data, as well as for the exercise of their ARCO rights, and we have taken measures to make the traceability of their personal data through technical procedures that allow us to track them during their treatment.

## 5. Payment application

This Privacy Policy also concerns the payment methods that TRUORA makes available to you in accordance with the stipulations of the Payment Terms and Conditions that the PayU electronic Platform applies. When you use the means of payment, you will also be providing your data, including your personal, property and financial data directly, to one or more independent and non-TRUORA-related entities that are in charge of the payment platform, which will manage your related information with the means of payment depending on your Country of Residence and in accordance with your own privacy notice, so we suggest you read it carefully. TRUORA is not responsible for the use and treatment of your personal financial or patrimonial data that have been provided to said third-parties as we do not have access to them.

## 6. AMENDMENTS TO THIS PRIVACY POLICY

TRUORA reserves the right to modify this Privacy Policy 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 Updated” date, which appears at the beginning of this document. Likewise, you will be subject to the privacy policies in force from the moment you do it.

## 7. TRANSFERS AND REFERRALS

TRUORA makes national and international remissions and transfers of your personal data in the terms of our comprehensive privacy notice and in compliance with applicable legal provisions, communications or remissions made between TRUORA and those responsible for the treatment of your data do not require your consent (article 2, section IX of the LFPD Regulation) and some transfers that are made within the provisions of article 37 of the LFPD do not require it either when any transfer requires your consent, this situation will be clearly indicated in our comprehensive privacy notice, therefore we invite you to consult it in the link that appears at the end of our privacy policy.

## **8. CONTACT US**

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

By using our services and our site you express that you agree with our privacy policy, however, it will be necessary that, in your case, you expressly accept our comprehensive privacy notice that you will find at [www.truora.com](http://www.truora.com).

### **Date of last update**

17/04/2020