

## INTEGRAL PRIVACY NOTICE

The dispositions contained in the present Integral Privacy Notice are generally applicable in Brazil, Colombia, Chile & Mexico,. with additional sections for specific countries.

### 1. IDENTITY AND ADDRESS OF THE RESPONSIBLE FOR THE TREATMENT OF YOUR PERSONAL DATA.

**Chile:** Truora Chile SpA (“Truora Chile”) with office address in Málaga 85 of 201, Las condes. Santiago, email address [contact@truora.com](mailto:contact@truora.com) and with tax identification number 77140321-2.

**Brazil:** Truora Tecnologia LTDA (“Truora Brazil”), with office address in ua Lourenço Marques, 297 - Vila Olímpia, São Paulo - SP, 04547-10, email address [contact@truora.com](mailto:contact@truora.com) and tax identification number 934.785.867/0001-11.

**Colombia:** Truora S.A.S (“Truora Colombia”) with office address in Carrera 12 # 90-20, Bogotá, email address [contact@truora.com](mailto:contact@truora.com) and tax identification number NIT 901189979-5.

**México:** TRUORA Fraud Prevention, S.A. de C.V. (“Truora México”) with office address in Av. Ejército Nacional número 351, Colonia Granada; Alcaldía Miguel Hidalgo; C.P. 11520 Ciudad de México email address [contacto@truora.com](mailto:contacto@truora.com).

Truora Brazil, Truora Chile, Truora Colombia, and Truora México will henceforward be referred to collectively as “TRUORA,” “we”, “our (s)”, or “us,” or individually with the names assigned in this section. All general dispositions contained in the Integral Privacy Notice will be applicable to these entities with additional sections covering country specific laws, as identified with the name of each country where the law in mention shall be applied.

#### 1.1 Responsible for Data Processing.

“TRUORA” is responsible for the proper use, protection, and treatment of your personal data in the countries in which it operates. TRUORA will adopt the necessary means to avoid the loss, damage destruction, theft, hack, alteration, or unauthorized access of the data in compliance with our Privacy Policy, the Integral Privacy Notice and applicable laws relating to Data Privacy in, Brazil, Chile, Colombia, Mexico, and any other countries on which we operate commercial activities in the office addresses mentioned before.

The present Integral Privacy Notice is addressed to our clients and users of the TRUORA platform, and Data Subjects and is intended to define the scope and the treatment of your data so that you can make free and informed decisions regarding the use of your personal data and have control and disposition over them. It’s TRUORA’s wish to let you know in a transparent manner the purpose of the treatment of your data so in such manner this can strengthen your trust and allow you, if such is the case, to give your free, informed, and expressed consent to the treatment of your personal data according to the terms and conditions established in the present notice.

## 2. PERSONAL DATA THAT WE COLLECT.

We collect the following types of information:

### 2.1 Necessary data we collect to provide our services.

**Personal identification data:** Full name, place and date of birth, unique population registration key (CURP/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. These data are considered to be sensible personal data, and will only be collected with your previous express consent through an electronic signature, or your handwritten signature.

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

**Electronic registration data:** Data we gather from your service agreement with us in our Web Site, IP address with which you access the Site, user preferences, type of browser, activity on the site.

**Tax Data:** The document, number or identification given by the Tax Authority of your respective country which is used to make your Tax declarations.

**Geo-location Data:** This is the data originated from the electronic device when you make use of our services, this includes your IP address and any data related to web use (eg: internet browsing), usage of applications and third parties services not related with TRUORA.

### 2.2 Optional data we collect with your consent.

To improve your experience when using the TRUORA Platform, you may also give us additional personal data with your express consent for their treatment according to the terms established in the present 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.

**Contact Information:** You can choose to import the contacts from you Address List or manually introduce information from your contacts list in order to access to 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 Integral 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 income data such as your bank account data/information or other forms of payment used on the payment platform that is operated by an independent third party. TRUORA neither requests nor collects sensitive personal data.

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

Through your use of TRUORAs 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 it discloses to TRUORA of the content of this Integral Privacy Notice, indicating the site where they can see any inquiries on it [here](#).

- **Identity information:** such as name, address, phone number, email address, and birth date.
- **Background information:** Relating clients they can, to the extent permitted by law in either of their respective countries and subjected to their consent, where applicable, acquire local criminal records, convictions or offences, to the extent of police history records and/or sexual offenders lists. 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 support for fraud detection and security issues, from third-party service providers or partners and combine it with previously collected information.

For eg; 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 assess risk. We may receive information about you and your activities inside and outside the TRUORA Platform through our partners of 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 minor inappropriately, we 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 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. WHY WE COLLECT DATA.**

Below, you can find a description of the ways in which TRUORA uses your personal data.

### **3.1 Necessary endings.**

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

- Fraud prevention.
- Fulfillment of the obligations derived from the service agreement entered into with clients.
- Administration of Truora user accounts.
- Identity verification.
- Check, corroborate, collate, verify or examine that the data contained in your voting credential matches the information that is in the custody of the electoral authority.
- Document validation.
- Obtain information regarding education, work experience, participation in illegal activities, and legal proceedings.
- Send communications related to the services by means of emails, data messages or by 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 agreement concluded.
- Analyze your business behavior.
- Conduct inquiries, market studies and marketing research.
- Prepare your consumption profile.
- Generate risk reports.

Additionally, we may use, store and process your personal information or personal data for the following necessary purposes: (1) to provide, understand, improve and develop the TRUORA Platform, (2) to create and maintain an environment of trust and better security conditions, (for example, to comply with our legal obligations and ensure compliance with TRUORA policies), and; (3) provide, personalize, measure and improve our advertising and marketing.

**3.1.1 Provide, improve and develop the TRUORA Platform:** We may use personal information or personal data to provide, improve and develop the TRUORA platform:

- Allow you to access and use the TRUORA Platform.
- Operate, protect, improve and optimize the TRUORA Platform and the TRUORA 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 the aforementioned purposes and to account for our legitimate interest in improving the TRUORA Platform, as well as the experience of our Members in it, and whenever it is necessary for the proper performance of the agreement entered into with you.

**3.1.2 Create and maintain an environment of trust and with better security conditions:** We may use personal information/personal data to create and maintain a trustworthy and secure environment:

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

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

**3.1.3 Provide, personalize, measure and improve our advertising:**

We may use personal information/personal data 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 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/personal data for the necessary purposes listed in this section taking into account our legitimate interest in carrying out marketing activities to offer you products or services that may be of interest to you.

**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 that include:

- Invite you to participate in special events, sweepstakes and promotions.

You may state that you do not want your personal data to be processed for unnecessary purposes by means of a written notice addressed in Mexico to TRUORA Fraud Prevention, S.A. de C.V. with address at Av. Ejército Nacional number 351, Colonia Granada; Mayor Miguel Hidalgo; C.P. 11520 Mexico City attaching the following information; full name, address, copy of your official identification, email and telephone number to be able to contact you and indicating in the reference the purpose of the communication. Refusal to process your personal data for non-necessary purposes does not constitute a reason for TRUORA to deny you the services it offers.

In the case of Mexico, as established in article 14 of the Regulations of the Federal Law on Protection of Personal Data Held by Individuals when the privacy notice is not made known to the owner directly or personally, the owner will have a period of five (5) days so that, where appropriate, you can express your refusal to process your personal data for non-necessary purposes, if you do not express your refusal, it will be understood that you have given your consent for the processing of your data for said purposes. necessary, unless proven otherwise.

#### **4. HOW WE COLLECT INFORMATION.**

TRUORA obtains your personal data:

**4.1** Directly when you request our services and in that case we make our privacy notice available to you prior to obtaining your personal data.

**4.2** In publicly accessible sources, in which case in the first contact we have with you we will make our privacy notice available to you.

**4.3** Indirectly through third parties with whom you have established a contractual relationship of any kind to whom you have given your consent to transfer your data and in this case we will make our privacy notice available to you before making the processing of your data.

#### **5.USE OF COOKIES.**

We use "Cookies" on our Website. 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" can reveal means of session identification, authentication, authentication means 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 clearing cookies from your computer's hard drive and setting 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 cookie and tracking 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 add-on 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 emailing us 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 be of interest to you, we may still send you emails about your account or any services you have requested or received from us. you can re-enroll.

## **6. COMPUTING IN THE CLOUD.**

In the processing of your personal data, TRUORA uses the services of third parties to store them 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 by the provisions of the applicable regulations, that as part of the provision of their services they cannot assume ownership or ownership of the personal data with respect to which they provide the service, which will maintain the confidentiality of all personal data that they receive as part of the services they provide to us; that have mechanisms to publicize their privacy policy, changes to it, the conditions of the service they provide, which allow TRUORA to limit the processing of data to the purposes of our comprehensive privacy notice, which have the following Adequate security measures for the protection of personal data on those who 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 them.

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

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

TRUORA sends your personal data to its subsidiaries, affiliates and group companies, as well as to those in charge of the processing of your data and such referrals, whether national or international, do not require your consent, the foregoing in accordance with the principles of good practices in the processing of data contemplated in the corresponding regulation. The companies of the TRUORA group will receive the Integral Privacy Notice and have the same or similar privacy policies and procedures as TRUORA depending on the legislation to that effect, and have implemented mechanisms to maintain confidentiality and avoid unauthorized disclosure of your data.

Additionally, TRUORA carries out data transfers to third parties other than the person in charge, who are:

**7.1.1** Collection companies - to collect any amount owed to TRUORA for the services provided.

**7.1.2** Courier companies: that can deliver the reports derived from the services agreed with TRUORA.

**7.1.3** Marketing companies.

**7.1.4** Government entities, decentralized organizations, state-owned companies, national credit institutions, national auxiliary credit organizations, national insurance and surety institutions, trusts, centralized public administration agencies.

**7.1.5** Administrative and judicial authorities at the Federal, State, local and municipal levels.

**7.1.6** National Electoral Institute.

**7.1.7** National Population Registry.

**7.1.8** Autonomous public bodies.

**7.1.9** 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 have given your consent, such as when you authorize a third-party website or application to access your Account. TRUORA, as well as giving us authorization to handle and disclose the information of third parties that you provide us with. As a client, the person responsible for the information you provide us, and accepting that you have the express authorization of the owner of the data for TRUORA to carry out the treatment of the same in the terms of this Integral 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 monitor the social media platforms with which we may share your personal information. TRUORA does not control the third party data 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 corresponding Integral 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, State security forces and bodies 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 comply with our legal obligations, ii) to comply with legal processes and answer claims or lawsuits 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 of any other nature that could expose us, you or any of our users to legal liability; iv) to enforce 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 your vital interests, or those of another person, or for the purposes of our legitimate interest or that of a third party in keeping the TRUORA platform secure, preventing any 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) perform criminal or police background checks, prevention of fraudulent practices and risk assessment; iv) perform product development, maintenance and bug resolution tasks; v) allow



the provision of TRUORA Services through third-party software tools and platforms (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 the TRUORA host guarantee).

#### **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 an account facilitated or processed through a third party (such as future employer, a financial entity or institution or any other natural or legal person) or used a promotion granted to a company, the Company in question will have access to your name, contact information, permissions and roles, and other information that you have allowed, as necessary for the purposes that you have agreed and according to the Business products that the Company has contracted.

#### **7.5 Aggregated data.**

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

The aforementioned 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 Integral 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 undertake, through an agreement or other legally binding and permissible means, to establish the necessary security measures to guarantee an adequate level of protection for your Personal Data and to comply with the terms and conditions of this Integral Privacy Notice.

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 agreement. If a TRUORA entity concludes that a supplier is not meeting these obligations, it will take immediate action.

By means of the authorization you grant us at the end of reading this Integral Privacy Notice, you accept the transfer of your Personal Data under the terms herein. Likewise, you can express your refusal to transfer your personal data, or if you require more information about this provision, you can send your questions to the email [contact@truora.com](mailto:contact@truora.com) and submit your request for information.

### **8. TRANSPARENT INFORMATION, COMMUNICATION AND MODALITIES FOR THE EXERCISE OF THE RIGHTS OF DATA SUBJECT (INFORMATION, ACCESS, RECTIFICATION, ERASURE, AND/OR RESTRICTION) OR FOR COMPANY TERMS "ARCO" RIGHTS.**

We remind you that in compliance to the regulatory terms of Personal Data Protection, either local or international law (eg: GDPR), you can exercise your rights as mentioned in the present headline, or for company terms your "ARCO" rights, through our web page [www.truora.com](http://www.truora.com) in the tab "*Fraud Library*" followed by the sub-tab of "*Information About your Rights*" or through a

written statement addressed to the local office, these addresses can be found in the foreword of the present Integral Privacy Notice under number “1”.

Likewise you can address your petition through the email address [contact@truora.com](mailto:contact@truora.com), with the following information:

- Name and address of the person making the request. Said address must be accompanied by a valid and reliable proof of address of the person making the request.
- Specify the reason for your request (which Personal Data and/or Rights you wish to exercise). This requirement is essential to attend to your request.
- Telephone number to contact you if needed.
- Email address, and,
- You must attach to the email a copy of your current official identification or whatever other document that works to prove your identity.
- Indicate the address of the physical address of the TRUORA offices within the country in which you reside. In the event that this does not establish the address of the country in which you reside, this field will not need to be filled out..

The foregoing must make explicit mention in the "Subject" section of the email with the title "Request for Rights" + country in which you reside and, where appropriate, the rights you wish to exercise. For such purposes, TRUORA will send you a “Rights Request” format within a period of no more than 72 hours, which you must fill out and forward in PDF format to the same email. Subsequently, TRUORA will respond in writing to your request within a period that will not exceed twenty (20) calendar days from the date you received your request and if it is appropriate, it will be effective within fifteen (15) calendar days following the date on which we communicate the response, which will be sent by email..

### **8.1 About the exercise of your rights.**

Various legislations on Data Privacy & Protection establish a catalog of Rights that THE CLIENT will be able to exercise in all cases to have a better understanding of the treatment, recopilation and usage of his Personal Data, among which mention is made but not but not limited to ARCO Rights in accordance to the following:

- **Access:** You can request access and information about your Personal Data used by TRUORA. Likewise, if you have an electronic account on the TRUORA site, you can access your data at any time by logging in with your username and password.
- **Rectificación:** You may request that any of your data be corrected, in the event that we have any inaccurate, incomplete, erroneous, wrong or out-of-date registration.
- **Cancelation/Erasure:** You may 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 do not have any contractual or legal relationship with TRUORA or any pending obligation to comply with.
- **Opposition/Restriction:** You may oppose the processing of your data through the process established by TRUORA, which is detailed in the previous paragraph.

The Owner may obtain the requested information in the manner indicated, as well as through the TRUORA platform through the chat that TRUORA has implemented for said purposes..

### **8.1.1 About CONSENT. Mechanism to revoke consent to the processing of your personal data.**

Likewise, we inform you that you can revoke your consent for 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 personal data will cause the impossibility of TRUORA to continue fulfilling the necessary purposes described in this Integral Privacy Notice and therefore it will be considered as the object of termination of the agreement subject to the Terms and Conditions of TRUORA that for more information you can review its content at [www.truora.com](http://www.truora.com) and therefore you will not be able to have the services and products that TRUORA offers to its Clients.**

For this reason and for this purpose, you must send a letter to any of the addresses indicated in the foreword of this Integral Privacy Notice indicated in section "1" as appropriate to the country in which you reside, or by email to [contact@truora.com](mailto:contact@truora.com).

In your email you must include the following information:

- Name and address of the person making the request. Said address must be accompanied by a valid and reliable proof of address of the person making the request.
- Specify the reason for your request (This requirement is essential to meet your request).
- Indicate the address of the physical address of the TRUORA offices within the country in which you reside. In the event that this does not establish the address of the country in which you reside, this field will not need to be filled out.
- If this is the case, the information of the company where you work.
- Telephone contact number.
- Email address, and,
- Attached to the email is a copy of your current official identification or that document that serves to prove your identity.

The foregoing must make explicit mention in the "Subject" section of the email with the title "Consent Request" + country in which you reside and, where appropriate, the reason or information you need about the granting of your Consent with us. For such purposes, TRUORA will send you a "Consent Request" format within a period of no more than 72 hours, which you must fill out and forward in PDF format to the same email. After this, TRUORA will have a maximum period of twenty (20) business days to attend to your request and we will inform you about the decision adopted, so that, if appropriate, your request becomes effective within fifteen (15) days. natural following the date on which we have communicated our response.

You may exercise the rights described in this section in the manner that has been described.

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

In the same way, if you are in any other country where we carry out operations together with Mexico, you can carry out the same procedure with the corresponding Consumer Protection authority, TRUORA's customer service will be able to guide you on your case regardless of the country on which the particular case that requires more information.

It is important that you understand that this Integral Privacy Notice is subject to the acceptance of TRUORA's Terms and Conditions, and that it is important to know its content before making any request that may cause the impossibility of continuing with TRUORA's services.

### **8.1.2 Data access and portability.**

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

### **8.2 Claims submission.**

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

- **In Mexico**, you can file a complaint with the National Institute of Transparency, Access to Information and Protection of Personal Data or visit the page [www.inai.org.mx](http://www.inai.org.mx) for more information.
- **In Colombia**, you can file a complaint with the Superintendency of Industry and Commerce or visit the page <https://www.sic.gov.co/> for more information.
- **In Brazil**, you can file a complaint or report with the Autoridade Nacional de Proteção de Dados or visit the page <https://www.gov.br/anpd/pt-br> for more information.
- **In Chile**, to obtain more information about habeas data in Chile before the Transparency Council or visit the page <https://www.consejotransparencia.cl/> for more information and advice.

## **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 from being accessed without authorization. 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, theft, misappropriated or are at risk for any other reason or if you know or suspect that your TRUORA Account has been used without your authorization, please contact us following the instructions in the Contact section below. In the event of a security breach of your personal data, TRUORA will inform the affected owners as soon as possible so that they can take the corresponding measures, indicating at least the nature of the incident, the personal data compromised, the recommendations regarding the measures they can take. to protect your interests, the corrective actions taken immediately and the means by which you can obtain more information in this regard.

## **10. MODIFICATIONS TO THE Integral Privacy Notice.**

TRUORA reserves the right to modify the Integral 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 Updated” date, which appears at the end of this document. Likewise, you will be subject to the Integral Privacy Notice from the moment you accept this. We suggest that you visit our site frequently to verify the current Integral Privacy Notice.

If at any time the identity of the person responsible for this Integral Privacy Notice changes, TRUORA requires to collect sensitive personal, patrimonial or financial data, the necessary purposes change or the transfer conditions are modified, we will put at your disposal a new Integral Privacy Notice in accordance with the Data Protection Legislation and its Regulations corresponding to the country where it is located, as well as the guidelines of the new Integral Privacy Notice.

## **11. ADDITIONAL PROVISIONS FOR COLOMBIA.**

In addition to the provisions previously established, for the processing of your personal data TRUORA Colombia will apply the following principles:

- 1. Legality:** The processing of your personal data will be carried out in accordance with the applicable legal provisions (Ley Estatutaria 1581 of 2012 and its regulatory decrees).
- 2. Purpose:** Your personal data will be used for the purposes indicated in this Integral Privacy Notice, which is specific and explicit and has been duly informed to the Owner and is permitted by applicable law. Likewise, TRUORA Colombia has informed the Holder in a clear, sufficient and prior way about the purposes for which their personal data will be used.
- 3. Freedom:** TRUORA Colombia obtains your personal data only with your prior, express and informed authorization.
- 4. Truthfulness or quality:** your personal data must be truthful, complete, accurate, updated, verifiable and understandable.
- 5. Transparency:** the owner is guaranteed that he will be able to obtain from TRUORA at any time and without restrictions information about the existence of data that concerns him.
- 6. Access and restricted circulation:** the processing of your personal data will only be carried out by the persons authorized by TRUORA Colombia and / or by those persons provided for in the Law.
- 7. Security:** TRUORA Colombia handles your personal data in accordance with the security measures that are necessary to prevent its loss, adulteration, consultation, use or unauthorized or fraudulent access.
- 8. Confidentiality:** All TRUORA Colombia employees and third parties who have access to your personal data have the obligation to keep confidentiality regarding the personal data they have access to during their work at TRUORA Colombia.

Natural persons whose personal data are processed by TRUORA Colombia have the following rights that they can exercise at any time:

- a.** Know the personal data that are subject to treatment by TRUORA Colombia, as well as request at any time that your data be updated or rectified.
- b.** Request from TRUORA Colombia proof of the authorization granted for the processing of your personal data.
- c.** Be informed by TRUORA Colombia, upon request, regarding the use you have made of your personal data.
- d.** Present before the Superintendency of Industry and Commerce complaints for infractions to the provisions of the Law.

- e. Request TRUORA Colombia to delete your personal data and / or revoke the authorization granted for its treatment.
- F. Free access to your personal data being processed.

The aforementioned rights can be exercised by the following persons:

- By the owner.
- For their successors, who must prove said quality.
- By the owner's representative and/or attorney-in-fact, after accreditation of said quality.
- By stipulation in favor of a third party.

For the exercise of the aforementioned rights, the procedure will be in accordance with the provisions of section 8 above with the following modifications:

TRUORA Colombia will comply with all the obligations of the Treatment Managers established in article 17 of the Law and other norms that regulate, modify or replace it.

At TRUORA COLOMBIA, the area responsible for the implementation of the Integral Privacy Notice is the customer experience area.

TRUORA COLOMBIA collects your biometric data as we informed you at the beginning of this Integral Privacy Notice and said data is considered sensitive data, therefore TRUORA COLOMBIA requires your explicit authorization for said treatment.

The authorization of the owner is not necessary when it comes to data of a public nature.

This Integral Privacy Notice is governed by the provisions of current legislation on protection of Personal Data referred to in article 15 of the Constitution of Colombia, Law 1266 of 2008, Law 1581 of 2012, Decree 1377 of 2013, Decree 1727 of 2009 and other regulations that modify, repeal or replace them.

## **12. CONTACT US.**

If you have any questions or complaints about this Integral Privacy Notice or about the practices of use and treatment of Personal Data of TRUORA or clarify any question about the exercise of your Rights or any that may result, you can go personally to the addresses indicated in the foreword hereof in numeral "1" by appointment, or contact us by email at the address [contact@truora.com](mailto:contact@truora.com).

**\*\*\*UNDER GOOD-FAITH AND BEST PRACTICES FROM THE TRUORA TEAM\*\*\***

- 1) THIS [LINK](#) WILL REDIRECT YOU TO THE GENERAL DATA PROTECTION REGULATION.
- 2) NOTE THAT UNDER COMPLIANCE FOR DATA PROTECTION REGULATION THE PRESENT DOCUMENT IS BASED UNDER GDPR, BRAZIL, CHILE, COLOMBIA AND MEXICO DATA PRIVACY AND PROTECTION REGULATION. NEVERTHELESS THIS ALSO APPLIES TO ANY OTHER COUNTRY ON WHICH WE OPERATE IN LATINAMERICA THOUGH LEGISLATION OR COUNTRY IS NOT MENTIONED.

**Last Update:**  
22/01/2021