

## PRIVACY POLICY

This Privacy Notice (the "Privacy Notice") is established in compliance with the provisions of the Federal Law on the Protection of Personal Data Held by Individuals and its Regulations (the "Regulation") and the Guidelines of the Privacy Notice.

All terms used with initial capital letters not defined herein shall have the meaning attributed to them in the Personal Data Act.

### 1. IDENTITY AND ADDRESS OF THE PERSON RESPONSIBLE FOR PROCESSING THE PERSONAL DATA

**INTUATION TECNOLOGÍAS DISRUPTIVEIVAS, S.A.P.I. DE C.V.** (the "Company"), with registered office in 407 East 12th Street #1RSW, New York, New York 10009, US, is responsible for the Processing of your Personal Data in accordance with this Privacy Notice.

The Company informs the Owners that its website is <http://www.qaptum.com/> (the "Website"). The Holders can contact the Company, by email [info@qaptum.com](mailto:info@qaptum.com)

### 2. MEANS OF OBTAINING PERSONAL DATA

The Company may collect the Personal Data of the Owner in the following ways:

- i. By digital means on the Website or on any other website where the Company markets its products and/or services, through information registration fields that you must complete to request the Company's products and/or services or through instant messages that you send to the Company through an instant messaging service for the public.
- ii. By means of telephone calls, in which the Owner will provide their Personal Data through verbal communication to request the products and / or services of the Company and / or to resolve doubts.
- iii. By email, in which the Owner will provide their Personal Data, through written electronic communication to request the products and / or services of the Company and / or to resolve doubts.

### 3. PERSONAL DATA SUBMITTED TO THE TREATMENT

To carry out the purposes listed in Section 4 of this Privacy Notice, we may use the following Personal Data of the Holders:

- i. Name, surnames, address, telephone number of house, cell phone and / or work, marital status, email, gender, age, date of birth, place of work and signature of the Holder.
- ii. Name, surnames address, telephone number of house, cell phone and / or work, marital status, email, gender, age, date of birth, place of work and signature of the guardian or representative of the Holder.
- iii. Clave of RFC and fiscal address of the Holder who makes any payment.

- iv. Information on the means of payment of the Holders that will be used for the acquisition of the Company's products and/or services, such as credit or debit card number (including the holder's name, expiration date and verifying digits) and billing address.

By accepting this privacy notice, the Owner expressly accepts the Treatment by the Company with respect to Personal Data.

#### **4. PURPOSES OF THE TREATMENT**

##### **A. MAIN PURPOSES**

The Personal Data that we collect from the Holders will be used for the following purposes that are necessary for the provision of the products and / or provision of the services that the Holders have requested from the Company:

- i. Licensing in favor of the Owner of the *software* and / or technological solutions owned by the Company.
- ii. Provision of any other service expressly requested by the Owner.

##### **B. SECONDARY PURPOSES**

Additionally, we may exclusively use your name, age, gender, address, telephone and email for the following purposes that are not necessary for the provision of the products and / or provision of the services that the Company offers to the Owner, but that allow and facilitate us to provide you with better care:

- i. Sending newsletters with valuable information related to technology.
- ii. Sending invitations to broadcast events and promotions.
- iii. Sending satisfaction surveys to improve our products and services.
- iv. Generation of statistical information that allows the identification of opportunities to improve our care processes.
- v. Generation of statistics for academia and research, with the commitment that your Personal Data will be subjected to a Dissociation procedure prior to its Treatment for this purpose and, therefore, may not be associated with the Owner.

##### **C. MECHANISMS TO EXPRESS NEGATIVE FOR THE PROCESSING OF PERSONAL DATA FOR PURPOSES THAT ARE NOT NECESSARY OR HAVE NOT GIVEN RISE TO THE LEGAL RELATIONSHIP WITH THE PERSON IN CHARGE.**

In the event that you do not wish your Personal Data to be processed for the secondary purposes listed in subsection B. of this Section 4, the Owner may express his/her refusal by sending an email to the following address [info@qaptum.com](mailto:info@qaptum.com)

The refusal to use your Personal Data for the secondary purposes listed in subsection B. of this Section 4 is not a reason for the Company to deny you the products and /or services contracted with said Company.

## **5. TRANSFERS OF PERSONAL DATA**

The Company does not carry out Transfers without having previously obtained the Consent of the Owner, when such Consent is required in accordance with the Personal Data Law.

In the event that, at the time of collecting Personal Data, there is a need to make a Transfer with respect to which the Personal Data Law requires the Consent of the Owner, the Company will inform the Owner.

In the event that the Owner does not accept or authorize the Transfer of Personal Data, the Company may deny the Owner the service that depends on the Transfer of said Personal Data.

Where appropriate, the Company will communicate to the Third Parties this Privacy Notice in order for them to know and comply with the conditions and purposes to which the Owner subjected the Processing of their Personal Data, assuming the same responsibilities that correspond to the Company as Responsible.

## **6. PERSONAL DATA OF INCOMPETENTS**

In order to guarantee the protection of the Personal Data of minors and persons in a state of interdiction, the Company will not collect, process or use in any way such Personal Data without the prior consent of who legally represents the Owner.

Where appropriate, the legal representative of said Holders will act on behalf of and on behalf of them, being empowered, to the extent that current civil legislation allows it, to exercise the rights provided for in this Privacy Notice, the Personal Data Law and its Regulations. To prove such representation, the Company will follow the rules of representation provided in the applicable legislation in the United Mexican States.

## **7. MEANS AND PROCEDURE FOR EXERCISING ARCO RIGHTS**

In accordance with the Personal Data Law, the exercise of the rights of access, rectification, cancellation or opposition with respect to the Personal Data that you provide to the Company (the "Arco Rights"), may be done by delivering a written request to the Company, through the email [info@qaptum.com](mailto:info@qaptum.com) or at the address located in 407 East 12th Street #1RSW, New York, New York 10009, US, during working hours from 9:00 a.m. to 2:00 p.m. from Monday to Friday.

Such application must contain at least the following: (i) name of the Holder; (ii) full address and /or email of the Owner; (iii) documents proving the identity of the Owner or, where appropriate, his legal representative, as well as the legal representation of the latter, in terms of the Regulation; (iv) clear and precise description of the right to be exercised and of the Personal Data with respect to which the right is sought to be exercised; (v) any other element or document that facilitates the location of the Personal Data; and (vi) in the case of requests for rectification of Personal Data, the Owner must indicate, in addition to what is indicated in this section, the modifications to be made and provide the documentation that supports his request.

In the event that the request lacks the information or documentation requested in accordance with the provisions of the immediately preceding paragraph, the Company will inform the Owner within 5 (five) business days of receipt of the request. The Holder must meet the request within 10 (ten) business days, counted from the next day on which he has received the request. If no response is given within this period, the holder's request will be taken as not presented. The communications indicated in this paragraph will be carried out via email, unless the Owner has not indicated email in his request.

In the event that the Holder attends to the request for information, the period for the person responsible to respond to the request will begin to run the day after the holder has met the request.

In the event that the Company does not require additional documentation from the Holder for the accreditation of its identity or the personality of its representative, it will be understood as accredited the same with the documentation provided by the Holder since the presentation of its application.

Once the request for one or more of the ARCO Rights has been entered, the response period by the Company will be 20 (twenty) working days from the date on which the request is received. If such request is appropriate, the Company will make the resolution effective within 15 (fifteen) business days following the issuance of the response.

The Company may deny the exercise of ARCO Rights, in the following cases:

- i. when the applicant is not the Owner of the Personal Data, or the legal representative is not duly accredited to do so;
- ii. when the Personal Data is not in the Company's database;
- iii. when the rights of a third party are injured;
- iv. when there is a legal impediment or the resolution of a competent authority, which restricts or does not allow the exercise of its ARCO Rights;
- v. Where the rectification, cancellation or opposition has been previously made

## **8. MECHANISMS AND PROCEDURES FOR REVOKING CONSENT**

The Owner may revoke the Consent he gave us for the Processing of his Personal Data, unless for any obligation derived from any legal provision we must continue to treat his Personal Data. The Owner must consider that, for certain of the aforementioned purposes, the revocation of your Consent will imply that we can not continue to provide the service and / or products that you requested us and, with it, the extinction of our obligation regarding the provision of the service or product requested, without any responsibility for making it impossible to provide the object of the service or product requested.

If the Owner wishes to revoke his Consent to the Treatment carried out by the Company with respect to his Personal Data, he must do so to our knowledge by submitting a request to the email [info@qaptum.com](mailto:info@qaptum.com) following the procedure, requirements and deadlines established in Section 7 above. It should be noted that the revocation of the Consent will not have retroactive effects, and that the Consent may not be revoked when said Treatment is an obligation that derives from the provisions of an applicable legal provision or

when any of the cases of exception to the Consent provided for in the Personal Data Law and its Regulations are updated.

## **9. LIMITATION ON THE USE AND DISCLOSURE OF PERSONAL DATA**

In order for the Owner to limit the use and disclosure of your Personal Data, we offer to contact us at the email: [info@qaptum.com](mailto:info@qaptum.com) in order to express your refusal to receive any communication for marketing, advertising or commercial prospecting purposes by the Company. Once this email has been received, the Company must grant the Owner a certificate of its receipt and within 48 (forty-eight) hours following the notification of such receipt will cease sending any communication that is not essential to carry out the provision of the Services requested by the Owner.

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

This Privacy Notice may be modified or updated as a result of legal requirements or by the internal policies of the Company. Any modification to this Privacy Notice will be made known to you, within 72 (seventy-two) hours after the change or modification is verified, through a notice on the Website, where we will indicate the changes made, mentioning the last update date and showing you the most recent version of said Privacy Notice.

Updated: July 15, 2021