

## PRIVACY POLICY

### About the Responsible Party

BaleiaFX, committed to the protection of your personal data, assuming responsibility for its use, handling and confidentiality in accordance with the provisions of the Federal Law on Protection of Personal Data Held by Private Parties and in order to provide you with information regarding the main characteristics of the treatment to which your personal data will be subjected, issues this privacy notice.

### Personal data subject to processing by BaleiaFX.

In order to comply with the purposes set forth in this Privacy Notice, BaleiaFX will collect the following information directly:

- Identification data, including your image,
- Migratory data,
- Contact information,
- Location data,
- Employment data,
- Academic data,
- Financial and/or patrimonial data, and
- Geolocation.

Likewise, BaleiaFX may collect these personal data indirectly in case they are provided to us by companies and/or other third parties with which BaleiaFX has commercial agreements.

BaleiaFX may process personal identification and contact data of third parties to validate the information you provided us and, if applicable, to provide you with the corresponding benefits in the case of beneficiaries. By providing this information, you acknowledge that you have informed such third parties about the use of their data and have obtained their prior consent.

Due to the nature of BaleiaFX's products and services, we may collect information from minors or persons in a state of interdiction. The processing of such data will be carried out only when the consent of the parent or legal guardian is obtained in order to comply with the purposes set forth in this privacy notice.

### Sensitive Data

In order to provide you with our products and services, BaleiaFX will collect the following categories of sensitive personal data:

- Biometric data, and
- Data about your health status.



## Primary purposes

BaleiaFX will process the personal data described in this privacy notice to fulfill the primary purposes indicated below:

- To fulfill the contractual relationship derived from the request and/or contracting of our products or services;
- To verify, confirm and validate your identity;
- To manage, operate and follow up on the services and products requested or contracted with BaleiaFX;
- Provide you with access to BaleiaFX's platform and applications, as well as to the functionalities offered within them;
- Send you notifications with information about the products or services contracted. This may include sending communications through emails, phone calls, short messages, and other physical, electronic and/or digital means of communication;
- Identify and prevent possible unlawful conduct that could mean a violation of the legal provisions in force;
- Carry out internal and external auditing processes; and
- Comply with the obligations established by the applicable legislation and the competent authorities.

## Secondary purposes

Also, if you do not object, BaleiaFX may process your personal data to fulfill the secondary purposes indicated below:

- Send you offers, promotions and advertising of our products and services;
- Contact you to invite you to participate in programs, activities and events organized by BaleiaFX, including tests to improve our products and/or services;
- Develop customer profiles for the offering of products and services; and
- Conduct surveys.

If you do not want BaleiaFX to process your personal data for any of the purposes described in this section, you may request it by sending an e-mail to the following address: [support@baleiafx.com](mailto:support@baleiafx.com).

## Transfers of personal data

BaleiaFX may transfer your personal data to both national and foreign entities, without requiring your consent in the following cases:

- To the National Electoral Institute to validate your identity;
- Commercial partners with whom we have entered into contracts for the marketing of products and / or services, for the benefit and / or interest of customers, as well



as to determine whether you are subject to purchase the goods and / or services we offer;

- Courier companies for the sending of communications related to the products and/or services contracted;
- Competent authorities in the cases legally foreseen.

## **Means and procedure to exercise ARCO Rights and/or revoke consent for the processing of personal data.**

You or your legal representative may exercise any of the rights of access, rectification, cancellation or opposition, as well as revoke your consent for the processing of your personal data by sending an email to the following address: [support@baleiafx.com](mailto:support@baleiafx.com).

Your request must be made through the ARCO Rights Request (hereinafter, the “Request”) that is available to you on the website [www.BaleiaFX.com](http://www.BaleiaFX.com), in the section called ARCO Rights/Revocation, which contains all the elements to be able to meet your request in accordance with the regulations. In order for BaleiaFX to be able to follow up on your request, you or your legal representative must properly prove your identity, so it is necessary to accompany your “Request” with a copy of a valid official identification.

In the event that the information provided in the “Application” is erroneous or insufficient, or if the corresponding accreditation documents are not attached, within five (5) business days following the receipt of the application, BaleiaFX may request that you provide the necessary elements or documents to process the application. You will have ten (10) business days to respond to the request, counting from the day after you have received it. If you do not respond within this period, the corresponding request will be deemed not to have been filed.

BaleiaFX will inform you of the decision taken, within a maximum period of twenty (20) business days from the date on which the request was received, in order that, if it is appropriate, you make it effective within fifteen (15) business days after the response is communicated. The response will be provided through the channel or means you have specified in your “Request”.

## **Options and Means to Limit the Use or Disclosure of Personal Information**

You may limit the use or disclosure of your personal data by sending an email to [support@baleiafx.com](mailto:support@baleiafx.com). The requirements to prove your identity, as well as the procedure to attend your request will be governed by the same criteria indicated in the previous section. In case your request is successful, BaleiaFX will register you in its own exclusion list.

## **Changes to the privacy notice**

BaleiaFX reserves the right, at its sole discretion, to change, modify, add or remove portions of this privacy notice at any time. In such event, BaleiaFX will maintain its comprehensive privacy notice in effect on the [www.BaleiaFX.com](http://www.BaleiaFX.com) website.

We encourage you to periodically visit this page to see if there are any changes to this notice.

