

PRIVACY POLICY AND PERSONAL DATA PROCESSING.

This privacy policy (the "**Privacy Policy**") states the rules under which **VU SECURITY LLC**, a company legally organized under the laws of the State of Delaware, United States ("**VU**") and its Affiliates (as listed in **the Exhibit I**) processes the Personal Data of Users and/or Clients (hereinafter, Users and Client are jointly referred to as the "**Data Subject**") through the Platform and/or any other URL that may replace it in the future.

1. DEFINITIONS:

Affiliate: means any company controlled by, under the common control of, or controlling VU. Control is featured when a controlling company holds the fifty per cent (50%) or more of the capital stock of the controlled company.

Consent: means any free, specific, informed, and unequivocal manifestation of will by which the Data Subject accepts, either by means of a declaration or a clear affirmative action, the processing of its Personal Data.

Personal Data: means the Information of any nature whatsoever referred to individuals or legal entities, either identified or identifiable.

Sensitive data: means the Personal Data disclosing racial and ethnic origin, political opinions, religious, philosophical, or moral thoughts, trade union affiliation, and information related to the health or sexual life of an individual; further, the User Content may be considered Sensitive Data.

User Document: means the identity document, identity card or passport provided by the User.

User Content: means the Photo, the User's Document and/or any other documentation or information that the User transfers, uploads, transmits or feeds to the Platform when his/her access to the Platform and the Identity Verification Process through the Link.

Client Content: means all information that is provided or made available by the Client to VU in connection with the Services and access to the Platform, including, but not limited to, content and/or data that Client transfers, uploads, transmits or feeds to the Platform.

Client: means any individual or legal entity that accesses to and registers on the Platform to use the Services and sends the Link to the User to carry out the Identity Verification Process.

User: means any individual who is a potential client, client and/or user of the Client's products and/or services, who has the legal capacity to enter into contracts in accordance with the laws of its country of residence and who accesses the Platform through the Link provided by the Client to carry out the Identity Verification Process.

Platform: means the portal called "**VU Identity Link**" accessible through the following URL identity.vu-one.com or any other URL replacing it in the future, made available by VU to the Client and/or any part of the Platform that is accessible by the User through the Link provided by the Client.

Services: means the services made available by VU to the Client, through the Platform, that allow the Client to perform an Identity Verification Process on a User in order to obtain a Verification Report of the identity of such User.

The terms that are not defined in this Privacy Policy will have the meaning assigned to them in the [Términos y Condiciones del Usuario](#) and/or in the [Términos y Condiciones del Cliente](#) that also appear on the Platform, as the case may be.

2. CONSENT OF THE DATA SUBJECT

By accepting this Privacy Policy, the Data Subject grants its consent so that VU may process its Personal Data, including the Sensitive Data provided in connection with the use of the Services through the Platform.

Data Subjects understand and agree that they may withdraw their consent at any time by sending a request to the Personal Data Delegate to the following e-mail address: dpo.vu@vusecurity.com.

3. CONTROLLER OF PERSONAL DATA

VU, addressed at 16192 Coastal Hwy Lewes, DE 19958, is the controller of the Personal Data of the Data Subjects. Further, its Affiliates may be co-controllers pursuant to the provisions of this Privacy Policy. Otherwise, its Affiliates will be in charge of the treatment of Personal Data.

Additionally, VU and/or its Affiliates have a Data Protection Officer (DPD/DPO) who is in charge of complying with the Personal Data protection regulations and who can be contacted through the following e-mail address: DPO.VU@vusecurity.com.

4. PURPOSE OF THE PERSONAL DATA PROCESSING

Data Subjects understand that the Personal Data are processed for the following purposes:

- a. Maintenance, management, analysis, development and improvement of the Platform;
- b. To authorize and manage access to the Platform, verify identity, authenticate visits and provide the Client with the Services;
- c. Analysis of browsing behavior and profiling of their browsing preferences and interests;
- d. To answer to queries made through the Platform;
- e. Dissemination of the activities conducted by VU;
- f. Offers and/or advertising of VU products;
- g. Provision of the Service, access to the Platform, and its improvement, as such terms are defined in the User Terms and Conditions and in the Client Terms and Conditions;
- h. To obtain the diagnosis of eventual connectivity problems that may exist between the Platform and the Data Subject, in order to improve the Service and its access;
- i. Service improvement analysis;

- j. Updating of the Privacy Policy, Client Terms and Conditions, and User Terms and Conditions.
- k. Testing and training of the Product development through validation of identity documents and selfies for improvements in the operation of the Platform.
- l. Testing and training of the Product development through validation of identity documents and selfies for improvements in the operation of anti-fraud technology.
- m. Analysis of identity documents for anti-fraud technology training.
- n. Selfie analysis for anti-fraud technology development training.
- o. Analysis of selfies and identity documents for positive user authentication training

If the Personal Data are used for purposes other than those expressed herein, VU, before processing such Personal Data, will give notice to the Data Subject for the purpose of obtaining its Consent.

5. PERSONAL DATA BEING PROCESSED.

- a. Client's Personal Data that are mandatory for accessing the Platform and its proper functioning, including without limitation, the following data:
 - (i) Name and Surname.
 - (ii) E-mail.
 - (iii) Personal Identification Number.
 - (iv) Contact details (phone number, address, country of residence, etc.).
 - (v) Geolocation.
 - (vi) ID photo.
 - (vii) selfie
- b. User's e- mail.
- c. Information on the activity and preferences of Data Subjects in the Platform.
- d. The Provider's (ISP) domain name granting access to the network.
- e. Date and time of access to the Platform.
- f. The Internet address from which the link leading to the Platform was originated.

6. STORAGE OF THE DATA SUBJECT'S PERSONAL DATA

The Personal Data collected by VU will be kept for a period determined according to the following criteria:

- (i) time-term for the provision of the Services and/or access to the Platform;
- (ii) legal duty of conservation;
- (iii) request for deletion and/or objection to the processing by the Data Subject in the applicable cases.

Upon expiration of the time-terms set forth in the above criteria, the Personal Data will be deleted in such a way that the Data Subject cannot be identified.

7. ASSIGNMENT AND TRANSFER OF PERSONAL DATA

The Data Subject understands that its Personal Data may be shared with:

- ✓ Third parties rendering services on behalf of VU and/or its Affiliates.

In such a case, these entities will be processors of the Personal Data.

- ✓ VU's Affiliates, for the same purposes as those included in this Privacy Policy.

If a legal obligation or requirement provides so, VU may disclose the Personal Data to the applicable authorities in accordance with such legal obligation or requirement.

The Data Subject accepts and agrees that, if necessary, VU may transfer the Personal Data outside the Data Subject's country of residence by means of an International Transfer of Personal Data. For this type of international transfer of Personal Data, in addition to the consent of the Data Subject, VU uses standard contractual rules in accordance with the international regulations.

VU undertakes to take such organizational, technical, and contractual actions as may be necessary to ensure the protection and security of the Personal Data, in compliance with the Personal Data protection laws of the country from which the Service is provided to the Data Subject and/or the Data Subject accesses the Platform, and the international regulations applicable to the Service. Furthermore, VU guarantees the rights of the Data Subject on its Personal Data in accordance with the regulations of the Data Subject's place of residence.

8. RIGHTS OF THE DATA SUBJECT AS HOLDER OF PERSONAL DATA

The Data Subject may exercise the following rights:

- A. Withdraw the consent granted through the acceptance of this Privacy Policy.
- B. Access its Personal Data.
- C. Rectify its Personal Data.
- D. Delete or remove its Personal Data so that it is not further kept and/or processed by VU.
- E. Limit the processing of its Personal Data.
- E. Object to the processing of its Personal Data.
- B. Portability of its Personal Data.

The rights described herein may be exercised by the Data Subject owning the Personal Data or by its legal representative, by sending a written communication addressed to DPO.VU@vusecurity.com. Or thru this form on Vu's webpage <https://www.vusecurity.com/ejerce-tus-derechos-en>.

9. EXCEPTIONS

VU may disclose certain Personal Data of the Data Subjects whenever such disclosure is necessary to:

- avoid legal liability;

- comply with a legal requirement, such as a search warrant, subpoena or court order;
- comply with a requirement of a governmental or regulatory authority; and/or
- protect the rights, property or safety of VU, Data Subjects, or third parties.

10. INFORMATION THAT THE DATA SUBJECT CHOOSES TO SHARE

Data Subjects may have access to third party services through links to such third party services from the Platform.

VU is not responsible for the privacy policies and/or practices of these third party services; the Data Subject is responsible for reading and understanding the privacy policies of such third party services. This Privacy Policy only governs the information collected and processed on the Platform by VU.

VU may contact Data Subjects through automatic notifications on the Platform, by email, SMS, MMS or other text message, and may collect information about such notifications.

The information collected is used to improve the Services.

11. CONFIDENTIALITY AND SECURITY OF INFORMATION.

VU takes reasonable security measures to protect the Data Subject's Personal Data and to prevent unauthorized access, any unauthorized modification, disclosure or destruction thereof. The information collected by VU is processed in confidentiality. Access for processing the Data Subject's Personal Data is restricted to the collaborators, contractors, operators, and representatives of VU who necessarily need access to perform their duties and develop or improve the Service.

In addition, VU requires its suppliers the same standards of confidentiality as it uses to provide the Service to the Data Subject, and does not allow access to this information to third parties outside VU.

Notwithstanding the foregoing and understanding that VU maintains security and incident response plans to control incidents related to unauthorized access to the private information it collects or stores, VU cannot guarantee that unauthorized third parties will not eventually breach the security measures supplied and thus misuse the Data Subject information.

12. DO NOT TRACK

VU and/or its Affiliates do not track Data Subjects on third-party websites and/or applications to provide targeted advertising and, therefore, do not respond to Do Not Track (DNT) signals. Third parties holding content within the VU Platform might set cookies on the Data Subject's browser and/or obtain information on the fact that a browser visited the Platform from a particular IP address. Third parties may not collect Personal Data from the Platform, unless it is provided directly by the Data Subject.

13. MINORS

Registration on the Platform and/or use of the Service are intended for Data Subjects having capacity and of legal age to enter into contracts in the country where they sign in and/or access to the Platform. Minors are not allowed to enter into the Platform and/or use the Service, nor are they allowed to provide any Personal Data or any other type of information. If this happens, VU will not be responsible for the damages that could be caused by improper use by these minors, delegating the responsibility to their parents and/or legal guardians.

14. AMENDMENTS TO THE PRIVACY POLICY.

VU may update this Privacy Policy at any time without prior notice. VU will notify the Data Subject on the amendments made before they are effective.

Exhibit I

The following entities are VU Affiliates:

- a) **VU Security S.A.**, a company duly organized under the laws of the Republic of Argentina, addressed at Av. Jujuy 2156 Piso 9, Autonomous City of Buenos Aires, Argentina.
- b) **VU Security Uruguay SRL**, a company duly organized under the laws of the Oriental Republic of Uruguay, addressed at Plaza Independencia 822 Oficina 101, City of Montevideo, Uruguay.
- c) **VU Chile SpA**, a company duly organized under the laws of the Republic of Chile, addressed at Avenida Apoquindo 3669 Oficina 902, Las Condes, Santiago de Chile, Chile.
- d) **VU Security Limited**, a company duly organized under the laws of England and Wales, addressed at Gallows Hill, Warwick CV34 6UW, United Kingdom.
- e) **VU Security & Fraud Prevention SL Unipersonal**, a company duly organized under the laws of Spain, addressed at Paseo del Pintor Rosales no 38, Madrid, Spain.
- f) **VU Inc.**, a company duly organized under the laws of the State of Delaware, United States of America, addressed at 1925 Lovering Ave. Wilmington, DE 19806.
- g) **VU Cybersecurity Mexico SA de CV**, a company duly organized under the laws of the United Mexican States, addressed at Jacobo Callot Numero 34, Interior 301, Colonia Santa María Nonoalco, Alcaldía Álvaro Obregón, Cp: 01420, City of Mexico, Mexico.
- h) **VU Ciberseguranca LTDA**, a company duly organized under the laws of the Federative Republic of Brazil, addressed at Capital do Estado de Sao Paulo, á Rua Martiniano de Carvalho, N° 864, 15° andar, Sala 1.505, CEP: 01321-000.