

# PRIVACY POLICY

## 1. INTRODUCTION.

Thank you for using Truora! We value your trust and are committed to protecting your privacy and keeping the personal information that passes through our services safe. We have a team dedicated to protecting and ensuring that personal data used in our services is handled correctly in each country where we operate.

This Privacy Policy describes the way in which we process 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 Services of Payment. This privacy policy describes our privacy practices for all 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, it is necessary that you read, and where appropriate, accept our Terms and Conditions and Integral Privacy Notice that you can find at [www.truora.com](http://www.truora.com).

## 2. PERSONAL DATA AND INFORMATION THAT WE COLLECT.

We collect information and personal data that fall into the following general categories.

## 2.1 Data that you provide to us.

### 2.1.1 Information necessary 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 formal agreement between you and us and allow us to comply with our legal obligations. Without this information, we may not be able to provide all the services requested.

- **Account information.** When entering to have a consultation in TRUORA, we require certain information such as your name, surname, email address, date and place of birth, unique population registration code (CURP) or its equivalent of the country in which you reside and country of origin.
- **Identity verification information.** To help create and maintain an environment of trust, we may collect information to verify your identity either with any current official document that serves to prove your identity (such as your Official Identification, Passport or Voting Credential) or other data from authentication that is required.
- **Biometric Data.** In order to unequivocally verify your identity, TRUORA will provide you with mechanisms and technological applications that allow you to provide us with your biometric data to obtain immediate recognition. These data are: fingerprints, facial recognition, iris recognition, autograph signature recognition, voice recognition.
- **Payment information.** Patrimonial or financial data. To use certain functions of the TRUORA Platform, it will be necessary to generate a payment, in which it will be redirected to an electronic payment platform of an independent third party. TRUORA does not request your patrimonial or financial data.
- **Communications with TRUORA and other Members.** When you communicate with TRUORA or use the TRUORA Platform to communicate with other Members, we collect information about these communications and any data that you choose to provide.

### 2.1.2 Information that you may choose to provide to us.

You can choose to provide us with additional personal data to obtain a better user experience when using the TRUORA Platform, for which, when you so decide, we require to obtain your express consent at that time for the processing of your additional data in the terms of this.

- **Additional profile information.** You can provide additional information as part of your TRUORA profile (such as your gender, preferred language(s), city and a personal description). Some of this information, as indicated in your Account, forms part of your public profile page and will be publicly visible, unless you decide otherwise when creating said profile.
- **Contact information from the Address List.** You may choose to import the contacts from your Address List or enter the information of your contacts manually in order to access 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 who will provide them with a copy of our Privacy Policy and Integral Privacy Notice or, where appropriate, will indicate that they can consult it on our page [www.truora.com](http://www.truora.com).

### 2.1.3 Information necessary for the use of the Payment Services.

The Responsible for the Treatment of Payment Data needs to collect the following data, as they are necessary for the proper execution of the contract entered into with you and for compliance with applicable legislation (such as money laundering prevention regulations). Without this information, you will not be able to use the Payment Services:

- **Payment information.** When using the Payment Services, the Responsible for the Treatment of the Payment Data, which is a third party other than TRUORA, will require certain financial data (such as your bank account or credit card data) to process payments and comply with applicable legislation.
- **Verification of identity and other data.** If you are an Applicant/Client, the Payment Data Controller may require information to verify your identity (such as photographs of your official identification document issued by the Government, passport, national identity document or voting credential) or other authentication data, your date of birth, address/domicile, email address, telephone number

and other data to verify your identity, provide you with Payment Services and comply with applicable legislation.

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

When you use the TRUORA Platform, we automatically collect information, including your personal data and that of third parties, about the services you use and how you use them. This information is necessary for the correct execution and to provide the services that 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.

#### **2.1.5 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 in 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 for 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 addressed to the client. The Client must inform the third parties whose personal data is disclosed to TRUORA of the content of our Privacy Policies and of our Comprehensive Privacy Notice, indicating the site where they can consult [www.truora.com](http://www.truora.com).

- **Identity information.** Such as name, address, phone, email, date of birth.
- **Background information.** In relation to clients, they may, to the extent permitted by applicable legislation and subject to their consent, when appropriate, obtain the local version of the history of police, criminal records or the inclusion in lists of sex offenders. We may use your information, including your full name and date of birth, to obtain such reports.
- **Other sources.** To the extent permitted by applicable law, we may receive supplementary information about you, such as demographic data or data to help detect fraud and security issues, from third-party service providers or partners and combine it with information from which you let us dispose of 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 fraud prevention and risk assessment efforts. We may receive information about you and your activities on and off the TRUORA Platform through our partners or information about the experiences and interactions that you have had through our network by associated advertisers.

## **2.2 Data of minors.**

Our websites and apps 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 are improperly processing personal information related to a minor, 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 communication and other technologies in public access sources, that is, in sources that anyone can have access to and that include telephone directories, newspapers, gazettes, official gazettes and social communication media, all in accordance with applicable regulations. Under the terms of article 10, section 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 (for the case of Mexico), Statutory Law 1581 of 2012 (for the case of Colombia), the Lei Geral de Proteção de Dados Pessoais (for the case of Brazil), Law 19.628 (for the case of Chile) the "General Data Protection

Regulation or GDPR, and other laws, international treaties, decrees, circulars, manuals, recommendations and/or relative and applicable regulations in Protection and Privacy of Personal Data, 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 the information, as well as the awareness, training and training of its personnel in personal data protection matter. 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 made by authorized users. Therefore, in the event of a violation of your personal data, we will analyze the causes for which such violation occurred and we will implement the necessary corrective, preventive and improvement actions to make the necessary security adjustments to reduce the risk of a new one infringement.

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

In the terms of the Federal Law on Protection of Personal Data Held by Private Parties, its Regulations, and other applicable legislation, TRUORA processes your data in accordance with the principles of legality, consent, information, quality, purpose, loyalty, proportionality. and liability as required by applicable law.

- **Legality:** We obtain your data in compliance with the applicable legislation both in Mexico and internationally.
- **Consent:** We obtain your consent for the processing of your personal data in a free, specific and informed manner, except when it is not required according to article 10 of the LFPD (Acronym for the Federal Law on Protection of Personal Data Held by Private Parties).
- **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 informational self-determination, privacy and protection of personal data. This principle is materialized when TRUORA makes the privacy notice available to you, be it comprehensive, simplified or short.

- **Quality:** We seek that the personal data object of treatment is exact, complete, pertinent, correct and updated to fulfill the necessary purposes that are 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, relevant, correct and updated to guarantee the veracity of the information and that you do not see yourself affected by said situation.
- **Purpose:** TRUORA only processes your personal data for the purposes specified in our comprehensive privacy notice and therefore 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 with respect to the information provided by our clients and users, maintaining reasonable expectations of respect for the privacy of the owners of the data in the understanding that we will carry out the treatment of their data in accordance with the agreement.
- **Proportionality:** We only process personal data that is necessary, adequate and relevant for 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 training, updating and raising awareness of our staff regarding the applicable provisions and obligations regarding the protection of personal data and we have established internal supervision and surveillance systems to verify compliance with our policies that 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 trace their personal data through technical procedures that allow us to track them during their treatment.

## **5. APPLICATION OF PAYMENT.**

This Privacy Policy also concerns the means of payment that TRUORA makes available to you in accordance with the stipulations of the Terms and Conditions of payment that the PayU electronic Platform applies. When you use the means of payment, you will also be providing your data, including your personal, patrimonial and financial data directly, to one or more independent entities and not related to TRUORA that are in charge of the payment platform, which will handle your related information with the means of payment depending on your Country of Residence and in accordance with the Comprehensive 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 since we do not have access to them.

## **6. MODIFICATIONS TO THE PRESENT 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 end of this document. Likewise, you will be subject to the Privacy Policy in force from the moment you accept it.

## **7. TRANSFERS AND REFERRALS.**

TRUORA makes national and international referrals and transfers of your personal data under the terms of our Integral Privacy Notice and in compliance with the applicable legal provisions, the communications or referrals made between TRUORA and those in charge of processing your data do not require your consent



(article 2, section IX of the LFPD Regulations) 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, said 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 TRUORA's data processing practices, you may contact us by email at: [contact@truora.com](mailto:contact@truora.com). By using our services and our Site, you state that you agree with our privacy policy, and that in the same way you know and accept the content of our Comprehensive Privacy Notice, however, it will be necessary that, in your case, you expressly accept our Terms and Conditions that you will find at [www.truora.com](http://www.truora.com).

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