



PRIVACY POLICY AND PERSONAL DATA PROCESS

The **Privacy Policy** describes the rules and practices regarding the collection and process of data and **Personal Data** that **VU INC.**, a company duly incorporated in the State of Delaware (“**VU**”) and its Subsidiaries (as defined below) collects and processes about the **User** through this site “vusecurity.com.ar” and/or any other URL that in the future replaces the **Site**.

The User should know that VU and its Subsidiaries values your privacy and cares about the way in which your personal information is processed, and we encourage you to read this Privacy Policy carefully.

THE USER UNDERSTANDS THAT, BY ACCEPTING THIS PRIVACY POLICY, THE USER IS GIVING US THE CONSENT FOR PROCESSING THEIR PERSONAL DATA.

THE USER FURTHER UNDERSTANDS THAT THIS CONSENT MAY BE WITHDRAWN AT ANY TIME BY THE USER SENDING A REQUEST TO THE FOLLOWING EMAIL:
DPO.VU@vusecurity.com.

THE USER UNDERSTANDS THAT THEY HAVE CERTAIN ADDITIONAL RIGHTS AND CHOICES THAT ARE DESCRIBED IN THE SECTION “What rights does a User have as the owner of their Personal Data? OF THIS PRIVACY POLICY.

The Personal Data collected and processed under this Privacy Policy may be shared with the Subsidiaries, as described in the section **Who will VU be able to share your data with?** This implies that this Privacy Policy applies to the data processing of VU and its Subsidiaries.

1. Who is responsible for processing the Personal Data that is collected and processed on the Website?

VU is responsible for Personal Data processing of the Site and its Subsidiaries in accordance with the provisions of this Privacy Policy. The following are Subsidiaries companies of VU:

- a. **VU Security S.A.**, a company duly incorporated under the laws of the Argentine Republic.
- b. **VU Security Uruguay SRL**, a company duly incorporated under the laws of Uruguay.
- c. **VU Chile SpA**, a company duly incorporated under the laws of Chile.
- d. **VU Security Limited**, a company duly incorporated under the laws of England and Wales.
- e. **VU Security & Fraud Prevention SL Unipersonal**, a company duly incorporated under the laws of Spain.
- f. **VU Security LLC**, a company duly incorporated under the laws of the State of Delaware, United States of America.
- g. **VU Cybersecurity Mexico SA de CV**, a company duly incorporated under the laws of Mexico.
- h. **VU Ciberseguranca LTDA**, a company duly incorporated under the laws of Brazil.



VU and its Subsidiaries has a Data Protection Officer who oversees compliance with personal data protection regulations, and may be contacted through the following email: DPO.VU@vusecurity.com

Why is the Personal Data collected and processed?

The Personal Data is collected and processed for the following purposes:

- a. Site Maintenance.
- b. Analysis of browsing behavior and profiling of browsing preferences and interests.
- c. To provide customer/User assistance for questions submitted through the Site.
- d. Diffusion of the activities carried out by VU.
- e. Offers and/or promotion of VU's products.

In the event that the Personal Data is used for purposes other than those expressed herein, VU and/or its Subsidiaries shall notify the User before VU process the Personal Data for such new purpose in order to obtain the User's consent.

What Personal Data does VU, and its Subsidiaries collect and process?

The Personal Data that VU and its Subsidiaries collects, and processes are the following:

- Data provided by the User through the Site. This may include, but is not limited to:
 - First and last name.
 - E-mail.
 - Company Name.
 - Identification number.
 - Contact information (phone number, address, email address, etc.).
 - Information about your location.
- Information about the activity and preferences of Users on the Site.
- The domain name of the provider (ISP) that grants access to the network.
- The date and time that the Site has been accessed.
- The Internet address from which the link to our Site originated.

How long will we keep your Personal Data?

The Personal Data collected by VU and its Subsidiaries will be kept for a determined period based on the following criteria:

- (i) legal obligation to conserve the data; and,
- (ii) Request for removal of, or lack of consent to process the Personal Data, on behalf of the User in the cases in which it proceeds.

Once the period has expired, the Personal Data will be eliminated or anonymized and the User may no longer be identified.



Who will VU be able to share your data with?

1. The User understands that Personal Data may be shared with HubSpot in its capacity as developer of the **Site Provider**. The Site Provider will act as the processor of the Personal Data and will undertake to process this data in accordance with this Privacy Policy.

2. Additionally, Personal Data may be shared with:

- Other entities that render services in favor of VU and/or its Subsidiaries. In this case, these entities will act as processors of that Personal Data.
- VU's Subsidiaries, with the same purposes reviewed in this Privacy Policy.

3. In the event that it is a legal requirement or obligation, VU shall be able to share the Personal Data to the corresponding authorities, in accordance with said obligation or legal requirement.

Finally, the User understands that in the event that the individuals and/or Subsidiaries described herein are located outside the User's country of residence, an international transfer of your Personal Data will be carried out pursuant to the provisions of data protection regulations.

The international data transfer is accepted by the User through the acceptance of this Privacy Policy.

In these cases, VU promises to adopt the organizational, technical and contractual measures to guarantee the protection and security of Personal Data consistent with the data protection laws of the User country of residence and the General Data Protection Regulation of the European Parliament and the Council of the European Union ("**GDPR**").

These Privacy Policies will be applicable to the Users residing in the countries attached hereto as **Exhibit A**.

What rights or choices do Users have as holders of their Personal Data?

The Users may exercise the following rights or choices:

- A. Withdraw the consent granted by the acceptance of this Privacy Policy.
- B. Access to the Personal Data that VU processes associated with that User.
- C. Modification of the Personal Data that VU has associated with that User
- D. Elimination or removal of the User's Personal Data that is stored and processed by VU. However, in certain cases, VU may continue to store and process Personal Data.
- E. Restriction of Personal Data processing. This right refers to the possibility that a User has to request that VU suspend the processing of their Personal Data.
- F. Opposition: The right of a User to oppose the processing of their Personal Data for a specific purpose.



G. Right to portability: Provided that VU receives the Personal Data in a structured, standardized, machine-readable and interchangeable form that allows it to be transferred to another organization or individual, provided that this can be done in an Automated manner.

The User may exercise these rights personally or through a legal representative or volunteer through the following email: DPO.VU@vusecurity.com

Furthermore, the User will have the right to file a claim before the national supervisory authority of the country of User's residence. For more information, refer to the indications of **Exhibit B** of this Privacy Policy.

Information you choose to share

The User may access to third party services through the Site, for example, by clicking on links to those third-party services from the Site. VU is not responsible for the privacy policies and/or practices of these third-party services, and you are responsible for reading and understanding the privacy policies of such third-party services. This Privacy Policy only governs information collected and processed on the Site.

Email and SMS communications with us.

VU may communicate with Users via push notifications on the Site, email, SMS, MMS, or other text message (to the extent you allow us to do so), and we may collect information about such communications, such as confirmation when you open an email, read a message, or receive a push notification. We use this information to improve our services, including but not limited to our customer service.

Modifications in the Privacy Policy.

VU and/or its Subsidiaries reserves the right to update this Privacy Policy at any time. These changes will be communicated before they go into effect. In the case of direct communications with the User, VU and/or its Subsidiaries will send an individual notification.

EXHIBIT A:

- 1. ARGENTINA.**
- 2. CHILE.**
- 3. URUGUAY.**
- 4. PARAGUAY.**
- 5. BOLIVIA.**
- 6. PERU.**
- 7. ECUADOR.**
- 8. COLOMBIA.**
- 9. VENEZUELA.**
- 10. BRAZIL.**
- 11. COSTA RICA.**
- 12. NICARAGUA.**
- 13. DOMINICAN REPUBLIC.**
- 14. EL SALVADOR**
- 15. GUATEMALA**
- 16. HONDURAS.**
- 17. PANAMA.**
- 18. MEXICO.**
- 19. THE UNITED STATES OF AMERICA.**
- 20. THE EUROPEAN UNION.**
- 21. ENGLAND AND WALES.**



EXHIBIT B:

ARGENTINA: Agencia De Acceso A La Información Pública

MEXICO: Instituto Nacional de Transparencia, Acceso a la Información y Protección de Datos Personales (INAI)

BRAZIL: Autoridad Nacional de Protección de Datos Personales - Autoridade Nacional de Proteção de Dados Pessoais

CHILE: Tribunales Ordinarios de Justicia.

COLOMBIA: Autoridad Colombiana de Protección de Datos.

URUGUAY: Unidad Reguladora y Control de Datos Personales.

COSTA RICA: Agencia de Protección de Datos de los Habitantes.

PANAMA: Autoridad Nacional de Transparencia y Acceso a la Información.

PERU: Autoridad Nacional de Transparencia y Acceso a la Información Pública

SPAIN: Agencia Española de Protección de Datos

PORTUGAL: Comissão Nacional de Protecção de Dados de Portugal (CNPD)

FRANCE: Agencia Francesa de Protección de Datos (Commission nationale de l'informatique et des libert

UNITED KINGDOM: Oficina del Comisionado de Información

NETHERLANDS: Data Protection Authority - Autoriteit Persoonsgegevens.

GERMANY: Der Bundesbeauftragte für den Datenschutz und die Informationsfreiheit

AUSTRIA: Österreichische Datenschutzkommission

BELGIUM: Commission de la protection de la vie privée

DENMARK: Datatilsynet