

# **Policy - Privacy and Data Protection applicable to the ECHEZ Website**

Echez Inc, (hereinafter, "ECHEZ") is committed to the utmost respect for the privacy of its users (hereinafter the 'User' or 'You') meaning all individuals who access, browse, use, or register on our website (hereinafter the 'Website'). This Policy for Privacy and Data Protection (hereinafter, the "PPDP") establishes the categories of information that ECHEZ may collect and describes how such information will be used.

The data provided to ECHEZ may be used to process your requests, complaints, claims, to further the commercial relationship and for advertising purposes.

This PPDP is intended to provide you with information about the security measures taken by ECHEZ to protect your information, your right to request access, rectification, modification or deletion of your personal information, and provide guidance on who you can contact within ECHEZ so that your questions regarding this PPDP are answered and any incidents that may arise are resolved.

This PPDP contemplates the collection and use of User personal information on the Website.

## **Authorization by User**

By accessing, browsing, using or registering with the Website, User expressly authorizes ECHEZ to collect, use, treat, disclose, assign, transfer, any personal information provided according to this PPDP. If you do not agree with this PPDP, please immediately withdraw from the Website. The personal data collected shall be appropriate, relevant and not excessive in relation to the scope and purpose for which it is gathered. The data collection shall not take place by unfair, fraudulent means or in a manner contrary to the provisions of the Personal Data Protection Regulations. The data subject to our treatment will not be used for purposes different or incompatible with those for which it was collected.

You may, at any time, request the withdrawal of your name from the database to which this PPDP refers.

Total or partially inaccurate data, or incomplete data, may be deleted and replaced, or if necessary, completed by ECHEZ when there is knowledge of the inaccuracy of the information in question, without prejudice to the data subject's rights of rectification, updating or deletion. The data will be stored in a way that allows the data subject to exercise the right of access. The data will be destroyed when it is no longer necessary or pertinent to the purposes for which it was collected.

You certify that the personal data supplied to ECHEZ has been provided by the legitimate holders with free, express and informed consent, except in the following cases, which are authorized by the Personal Data Protection Regulations: a) When the data is obtained from unrestricted public access sources; b) When the data is collected for the exercise of functions proper to the powers of the State or by virtue of a legal obligation; c) Lists whose data are limited to name, national identity document, tax or social security identification, occupation, date of birth and domicile; and, d) When they derive from a contractual, scientific or professional relationship of the owner of the data, and are necessary for the contract or relationship development or fulfilment.

ECHEZ wishes to make you aware that it collects personal data, by following the guidelines set forth in this PPDP: a) The purpose for which they will be treated and its recipients or class of recipients; b) The existence of the file, register, data bank, electronic or of any other type, and the identity and address

of the person responsible; c) The obligatory or optional nature of the answers to the questionnaires proposed, especially regarding sensitive data, if and when collected; d) The consequences of providing data, the refusal to do so or the inaccuracy thereof; and, e) The possibility of the owner of the data to exercise the rights of access, rectification and deletion of their data. ECHEZ will not request data owners to provide sensitive data, nor transfer the personal data contained in the databases except when complying with a legal obligation.

## Information Gathering

This PPDP contemplates the collection and use of personal information provided using the Website. If you provide us with information, please note that it will be processed automatically and incorporated into the ECHEZ database. Also be aware that we can use this information as indicated below: save and process that information to better understand your needs, understand how to improve our products and services; process your requests, complaints, claims, use it for advertising purposes, produce statistics based on it; and, communicate with you, or provide third parties with global, but not individual, information about visitors or users of our site.

ECHEZ collects information online when you register to use any of the services available on this Website, use the Website, your account with ECHEZ or the payment solutions available from ECHEZ, send us questions or comments or requests information or materials, make complaints or claims, report an incident or provides information in any way, by any mechanism available through this Website. The type of information collected may include name, type and number of document, telephone, email address and / or any other information that allows us to individualize it. In all cases that you provide information, and in accordance with current legislation, you declare that the information provided is true, and give your free, express and informed consent for such information to be used for the purposes mentioned above, along with authority for us to treat, store, collect such data in the databases owned by ECHEZ.

The Website server automatically collects certain information concerning the users of the Website, such as: Internet Protocol (IP) address of your computer, IP address of your Internet Service Provider, date and time you entered on the Website, Internet address of the page from which you connected directly to our Website, operating system that you are using, sections of the Website that you visited, pages read and images displayed, and any other content that you have sent or downloaded from the Website. We use this information for administrative or statistical purposes or to improve the services provided by the Website.

The Website uses 'cookies', a technology that installs information on a user's computer of a Web page in order to allow it to recognize future visits by that computer. ECHEZ uses the information provided through cookies to: recognize it as a previous User of the Website; offer you personalized content of the Website and information for your personal use; track your activity on the Website; complete online forms with your personal data to respond to your needs and concerns more efficiently; and, facilitate and improve your experience on the Website, among other things. You may choose to reject the 'cookies' if your browser so permits, but that could affect your use of the Website and your ability to access certain sections. The advertising displayed on the Website may also contain cookies or other technologies. Such advertising may come from third-party advertising companies. Note that ECHEZ has no control, responsibility or obligation with respect to those cookies or other similar technologies used in said advertising or regarding the use or disclosure of information collected through advertising cookies.

## Personal Data Specifically Provided

Upon registering for one or more of our services, you may be asked to provide certain personal information for purposes such as facilitating communication with you or enabling access to certain sections or areas of the Website. You will always have the option to choose whether or not you want to provide personal information. If you choose not to provide the requested personal information, you may not be able to access certain sections of our Website or use the services provided in it. Also, you must consider that to use our services you must accept the privacy policy of the ECHEZ services, in addition to the terms set forth herein.

Some areas of the Website may require the User to register on the Website by creating a user account. In case of registration, the User accepts and undertakes to provide accurate, current and complete information about his person, as requested in the registration form; and keep your data updated on the Website, so that the information remains accurate, truthful, updated and complete. The User will respond to, in any case, the veracity of the data provided, reserving ECHEZ the right to exclude any User who has provided false information, without prejudice to initiate legal actions that correspond.

## **Our Use of your Personal Data**

If you provide us with personal information, please be aware that such personal information will be processed by ECHEZ and incorporated into the ECHEZ database. The collection and processing of information and personal data are intended for the provision, management, administration, updating and improvement of services and contents, made available to users by ECHEZ through its Website. Likewise, personal data may be used for your participation of contests, promotions, offers, communications to users in relation to the services and all other content provided by ECHEZ, as well as for any other use permitted by law.

## **Restriction on Sharing your Personal Data**

ECHEZ will not share, assign or transfer your personal information to third parties, except in those cases provided in this PPDP. You authorize ECHEZ to share the information provided with the controlling companies, affiliates, subsidiaries, related companies or intermediaries related to ECHEZ. Said information will be disclosed, shared or assigned in accordance with legislation in force applicable to the protection of personal data. ECHEZ may disclose such information to third parties without your consent as required by law or by judicial resolution, to cooperate with governmental authorities in investigations and to enforce or protect the intellectual property or contractual rights of ECHEZ. In some cases, said recipients could be found or have relevant operations in jurisdictions whose level of protection might not be equivalent to that granted by applicable legislation. In those cases, ECHEZ must necessarily share the personal information of the User only for compliance with the purpose for which the information was requested, for which the User who accepts to participate in those services gives his or her consent.

When you upload photographs or other materials to the Website, your username and email address will be presented on the Website as the source of such materials. The materials, including photographs and other graphics displayed on the Website, will generally be available to all users of the Website, unless the materials are subject to a password, in which case the materials may only be accessed by users of the Website.

## **Security of your Information**

ECHEZ safeguards the information according to security standards and procedures established by applicable regulations. ECHEZ guarantees that the internal processes of its databases comply with the obligations of security and confidentiality. However, you acknowledge that the existing technical means

used to provide security are not unbreakable, and that even when all reasonable security provisions are adopted it is possible that unlawful manipulation, destruction and / or loss of information may occur. On the other hand, while we intend to protect such data, you must also take measures to protect your information. We urge you to take every precaution possible to protect your personal information while you are using the Website. At a minimum, we suggest you make sure that you are using a secure browser when connected to the Internet, and do not communicate your password to any third party.

## Rights over the Data

ECHEZ guarantees the freedom of exercise of the rights of the users granted by the provisions of the Protection of Personal Data laws in force. User may exercise the rights of access, rectification, updating or deletion of data and opposition. The exercise of said rights may be carried out by a User by sending an email addressed to [contact@somsight.com](mailto:contact@somsight.com). Upon receiving a formal request made by User, ECHEZ will proceed to provide access to your personal information, as well as to rectify, update or delete the personal data as appropriate, in the terms and legal terms and when appropriate. The deletion of data will not proceed when it could cause damage to rights or legitimate interests of third parties, or when there is a legal obligation to preserve the data.

## Limitations on the Storage of User Data

ECHEZ will keep your personal information for the term necessary for the fulfilment of the purposes described in this PPDP, and to comply with legal obligations. Any personal information collected from User will be destroyed when it is no longer necessary or pertinent to the purposes for which it was collected, unless there is a legal obligation to retain for a longer term.

## Authority to Display Advertisements

ECHEZ may use personal data that are suitable for establishing specific profiles for promotional, commercial or advertising purposes, or allow the establishment of consumption habits, when these are in documents accessible to the public or have been provided by the owners themselves or obtained with their consent.

If you wish to stop receiving messages via e-mail with advertising, you can contact Echez at [contact@somsight.com](mailto:contact@somsight.com).

## Changes to this PPDP

ECHEZ reserves the right to modify this PPDP periodically, without prior notification or consent by User. Accessing our Website after a change represents your consent and acceptance of said changes. We suggest you visit this PPDP periodically to be informed of the most current version. If you have any comments or questions about this PPDP or your personal information, please contact us at [contact@somsight.com](mailto:contact@somsight.com).