# **Privacy Policy for U2 Group**

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#### 1. Introduction

Welcome to U2 Group. We are committed to protecting your privacy and ensuring that your personal data is handled transparently, securely, and in accordance with applicable laws. This Privacy Policy outlines how we collect, use, disclose, and protect your information across all our services.

### 2. Scope of This Policy

This Privacy Policy applies to:

- The website <a href="https://u2.group">https://u2.group</a>
- The sale of pre-designed house plans
- The provision of custom architectural design services
- Any data collection via email, contact forms, social media, or customer portals

# 3. Legal Framework and International Compliance

U2 Group complies with the following data protection laws:

- General Data Protection Regulation (GDPR EU)
- California Consumer Privacy Act (CCPA/CPRA US)
- UK Data Protection Act
- Personal Information Protection and Electronic Documents Act (PIPEDA Canada)
- Colombian Law 1581 of 2012

We follow principles of lawfulness, transparency, purpose limitation, data minimization, integrity, and accountability.

# 4. Information We Collect

Category	Description	How We Collect
Personal Identifiers	Name, email, phone, address	Forms, direct contact
Billing Information	Payment method, billing address, Stripe data	Checkout process
Project Data	ect Data Design preferences, property info	
Usage Data	IP address, device type, browser, behavior	Cookies, analytics
Communication History	Emails, support chats, service requests	CRM tools

#### 5. Use of Collected Information

#### We use your information to:

- Deliver purchased house plans or custom design services
- Process payments and manage orders
- Communicate project updates, confirmations, or legal notices
- Improve our website and user experience
- Send promotional or informational content (with your consent)
- Fulfill legal and tax record-keeping obligations
- Detect, prevent, or investigate fraud and abuse

# 6. Legal Basis for Processing

We process your data based on the following legal bases:

- Consent: For email marketing, cookies, and optional data.
- Contractual necessity: To provide and fulfill purchased services.
- Legal obligations: To comply with accounting, tax, and legal requirements.
- Legitimate interest: For internal analytics, fraud prevention, and improving our services.

#### 7. User Consent

Consent is collected clearly and explicitly before:

- Subscribing to newsletters
- Using cookies (except essential ones)

• Submitting forms requesting services

You may withdraw your consent at any time by emailing contact@u2.group or via the unsubscribe link in our communications.

### 8. Sale of Pre-Designed House Plans

All house plans available for sale are the intellectual property of U2 Group. When you purchase a plan, you receive:

- A non-exclusive, non-transferable license for a single construction project
- The right to make personal modifications for your own use only
- No rights to redistribute, resell, or share the plan in any form
- All copyrights remain the property of U2 Group

Any misuse of the plans constitutes a breach of intellectual property law.

Full license terms: <a href="https://u2.group/license-pre">https://u2.group/license-pre</a>

# 9. Custom Architectural Design Services

For custom design projects:

- All materials (plans, renders, 3D models) are the sole property of U2 Group
- Clients receive a license to use the design for one specific project and one location
- Replication, resale, or use in other locations is strictly prohibited
- U2 Group reserves the right to include designs in portfolios or marketing, unless otherwise agreed in writing

Custom license terms: https://u2.group/custom-design-license

### 10. Data Sharing and Disclosure

We do not sell your data. We share your information only with trusted third parties that help us provide services:

Third Party	Purpose	Region
Stripe	Secure payment processing	United States
Google Analytics	Website usage analytics	Global
CRM/Email Services	Project and communication	United States / EU

All service providers operate under signed Data Processing Agreements and are required to comply with applicable privacy laws.

# 11. Payment Processing

All payments are securely processed via Stripe. U2 Group does not store or access your full credit card details.

Stripe complies with international security standards such as PCI DSS. For more, see Stripe's policy:

https://stripe.com/privacy

# 12. Cookies and Tracking Technologies

We use cookies to:

- Enable essential functionality (login, cart, etc.)
- Analyze user behavior to improve navigation and services
- Deliver tailored advertising (only if consented)

You can manage your cookie preferences anytime via our <u>Cookie Settings Page</u> or your browser.

#### 13. Data Retention

Data Type	Retention Period	Purpose
Billing Records	7 years	Legal and tax obligations
Custom Design Files	10 years	Client support and portfolio use
Communications	3 years	Service history and inquiries
Analytics & Usage Logs	2 years	Site improvement and insights

We regularly review and delete data no longer necessary.

# 14. Your Rights and Choices

Depending on your location, you have the right to:

- Access the data we store about you
- Correct inaccurate or outdated information
- Request data deletion ("Right to be forgotten")
- Withdraw previously given consent
- Object to specific types of data use
- File a complaint with a data protection authority

To exercise any of these rights, email us at contact@u2.group.

#### 15. Data Portability

Upon request, we will export your personal data in a structured, commonly used, and machine-readable format (such as CSV or JSON) and provide it to you or a third party of your choice within 30 days.

#### 16. Security Measures

We take security seriously and implement measures such as:

- HTTPS/SSL encryption on all pages
- Firewalls, anti-malware, and DDoS protection
- Restricted internal access to data
- Regular security audits and system monitoring
- Encrypted backups in secure, geographically distributed locations

### 17. Children's Privacy

Our services are not intended for children under 13. We do not knowingly collect data from minors. If we discover that data from a child has been collected, we will delete it promptly.

### 18. Third-Party Links and Services

Our website may include links to third-party websites (e.g., Pinterest, Instagram, payment processors). We are not responsible for their privacy practices. Please review their policies separately before interacting with them.

#### 19. International Data Transfers

Your data may be transferred to and processed in countries outside your own. All international transfers comply with applicable privacy regulations via:

- EU Standard Contractual Clauses
- Data Privacy Framework (US-EU/UK)
- Regional cross-border data agreements

#### 20. Data Breach Notification

If a security breach occurs that compromises your personal data:

- We will notify you within 72 hours, in accordance with GDPR and other laws
- The notification will include details of the breach, affected data, and mitigation steps
- We will inform supervisory authorities as required
- Internal audits and corrective measures will follow immediately

# 21. Automated Decision-Making and Profiling

U2 Group does not use fully automated systems to make decisions that could significantly affect you (e.g., loan approvals, service rejections).

We also do not engage in behavioral profiling for high-risk decisions. If this ever changes, we will update this policy and obtain your explicit consent.

### 22. Data Accuracy and Verification

We rely on you to provide accurate, complete, and current data.

- You can review and update your data by contacting contact@u2.group
- We periodically audit and verify information where appropriate
- Inaccurate or outdated data is corrected or deleted as needed

# 23. Opt-Out Mechanisms and Do Not Track

You may opt out of:

- Email marketing via the "unsubscribe" link in our messages
- Cookies and tracking technologies via your browser or our Cookie Settings Page
- Behavioral ads through <a href="https://optout.aboutads.info">https://optout.aboutads.info</a>

We honor Do Not Track (DNT) browser settings where technically feasible.

#### 24. Data Controller and Data Processors

U2 Group is the Data Controller of all data collected on our website.

We use Data Processors (external providers) such as:

Processor	Purpose
Stripe	Secure payments
Google Analytics	Usage tracking
CRM providers	Communication & support

All processors operate under signed Data Processing Agreements (DPAs).

# 25. Dispute Resolution and Governing Law

Any dispute arising from this policy or related data processing activities will be governed by the laws of the Republic of Colombia.

- Exclusive jurisdiction: courts of Pasto, Nariño, Colombia
- We encourage resolving disputes amicably before taking legal action
- You may also contact your regional Data Protection Authority

#### 26. Consent Logs and Audit Trails

We maintain timestamped records of:

- User consents for cookies, emails, and data processing
- Requests for access, correction, and deletion

Data breach responses and notifications

These logs are securely stored and available for regulatory review if required.

#### 27. Data Protection Officer (DPO)

For any inquiries regarding data protection, contact our appointed DPO:

Name: Juan Jose Lima - Privacy Lead

Email: dpo@u2.group

Mailing Address: U2 Group, Pasto, Nariño, Colombia

We respond to all inquiries within 30 business days.

### 28. Privacy by Design and Default

We follow the principles of Privacy by Design, meaning that:

- Data protection is integrated into all products and services from the outset
- We collect only what is necessary
- We ensure security and privacy by default (e.g., opt-out options, minimal data collection)

### 29. Third-Party Data Sharing Transparency Register

We maintain a public record of the third parties we share data with, including:

- Their identity and location
- The purpose of data sharing
- The legal basis for processing

Security and confidentiality guarantees

You can view this register at:

https://u2.group/transparency-register

### 30. Data Processing Agreements (DPAs)

All third-party service providers that process personal data on our behalf operate under Data Processing Agreements (DPAs), which include:

- GDPR Article 28 clauses
- Confidentiality requirements
- Breach notification responsibilities
- Security and privacy standards

These agreements ensure that your data is handled with the same care and legal protection as within U2 Group.

# 31. Language and Localization

This policy is provided in English and Spanish.

- If there is a conflict between translations, the English version prevails globally, unless local law requires otherwise.
- We strive to maintain clarity and consistency across both versions.

#### 32. Definitions and Glossary

Term Definition
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Personal Data	Any information that identifies or can be used to identify an individual
Controller	Entity that determines the purpose and means of data processing
Processor	Entity that processes data on behalf of the Controller
Data Subject	The individual whose personal data is being processed
Consent	Freely given, specific, informed, and unambiguous indication of agreement
Profiling	Automated evaluation of personal aspects (e.g., preferences, behavior)

# 33. Jurisdictional Compliance Table

Region	Regulation	U2 Group Compliance Measures
European Union	GDPR	DPO, consent logs, data access tools
United States	CCPA/CPRA (California)	Right to delete, opt-out mechanisms, transparent use
Canada	PIPEDA	Consent-first approach, breach notification

Colombia	Ley 1581 de 2012	Habeas data rights, database registration
Brazil	LGPD	Legal bases, privacy notices, user access rights

# 34. Record of Processing Activities (ROPA)

U2 Group maintains an internal Record of Processing Activities (ROPA) that includes:

- Types of data collected
- Purposes of processing
- Data recipients and storage locations
- Retention periods and security measures

This record is available to regulators upon legitimate request.

# 35. Behavioral Advertising and Pixels

We may use third-party tracking technologies, such as:

- Meta Pixel (Facebook/Instagram)
- Google Ads Tag
- TikTok Pixel

These tools help us deliver relevant ads based on your interaction with our website. You may opt out by:

• Adjusting preferences in our **Cookie Settings Page** 

• Using <a href="https://optout.aboutads.info">https://optout.aboutads.info</a> for general ad networks

#### 36. Encryption Standards

All personal data is protected using:

- AES-256 encryption at rest (on servers and backups)
- TLS 1.2 or higher for all data in transit (e.g., form submissions, logins)
- Secure hosting and geographically redundant backup systems Limon9

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#### 37. Data Protection Impact Assessments (DPIAs)

We conduct Data Protection Impact Assessments when:

- Launching new technologies that process personal data
- Starting projects that involve large-scale or sensitive data
- Required under GDPR, LGPD, or other applicable laws

These assessments ensure that risks are identified and mitigated proactively.

#### 38. Policy Updates

We may update this Privacy Policy from time to time. Changes may be due to:

- New regulations
- Updates to our services

• Enhancements to user rights

We will notify you of material changes via email or our website.

The latest version is always available at: <a href="https://u2.group/privacy">https://u2.group/privacy</a>

#### 39. Contact Us

If you have any questions or concerns about this Privacy Policy or our data practices:

**U2 Group** 

Pasto, Colombia

**ा** contact@u2.group

https://u2.group