

Privacy policy, cookies and personal data treatment.

BEFORE STARTING...

In this Privacy Policy, cookies and personal data treatment, you will find all the relevant information that applies to the use we make of the personal data of our customers and users when interacting with us.

We are transparent about what we do with your personal data so that you understand the implications of the uses we carry out or the rights you have concerning your data:

- We provide you with all the information in this Privacy Policy, cookies and personal data treatment that you can consult whenever you deem it appropriate.

Some names we will use in this Privacy Policy, cookies and personal data treatment

- When we refer to our Platform, we will generally refer to any of the channels or means that you have used to interact with us. The main ones are:
 - Our website.
 - Our corporate email.
 - Our customer service line.

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1. Who is responsible for the treatment of your data?

For all legal purposes, the following company will be responsible for processing and protecting your personal data:

- **Internaut S.A.S**, a commercial company, is legally constituted under Colombian laws and identified with Nit. 901.463.593-0, located at Calle 18 No. 31-28 in Bucaramanga, Santander, Colombia, with the email hello@joinnexus.io and postal code 680002.

2. What is the purpose of processing your personal data?

Internaut S.A.S is a company dedicated to information technology activities and computer services, and computer systems development activities. As the responsible party for the processing of the personal data of clients and users, we recognize the importance of the security, privacy, and confidentiality of personal data.

For this purpose, we have created this Privacy Policy, cookies, and personal data treatment (hereinafter the "Privacy Policy, cookies, and personal data treatment"), which will regulate the information and data that are collected, stored, and/or managed by **Internaut S.A.S**.

It is important to mention that for the correct development of our interaction through the Joinnexus platform, we will need to process some data, which in general will be, depending on the case, the following:

- Your identifying data (for example, your name, surname, email, etc.);
- Economic and transactional information (for example, your payment or card data, information about your purchases and memberships on Joinnexus, etc.);
- Connection, geolocation, and navigation data (for example, location data);

Remember that when we ask you to fill in your personal data to give you access to some functionality or service of the Platform, we will mark some fields as mandatory since they are data that we need to provide the service or give you access to full functionality.

In other cases, we may passively obtain information by using tracking tools, such as browser cookies or other similar technologies on our Platform or in the communications we send you. In such cases, we will only process your data in

relation to that functionality or service, by what is established in this Privacy and Cookies Policy.

Please note that if you decide not to provide us with that data, you may not be able to complete your user registration or may not be able to enjoy those services or functionalities.

Depending on how you interact with our Platform, we will process your personal data for the following purposes:

1. **To manage your registration as an user of the Platform:** In case you decide to register as an user on our Platform, **Internaut S.A.S.** needs to process your data to identify you as a user of the Platform and give you access to its different functionalities that are available to you as a registered user. You can cancel your registered user account by contacting us through Customer Service.

We inform you that the data we collect about your activity, obtained through the different channels of the Platform, including your purchases, will remain linked to your account so that all information can be accessed at once.

2. **For the development, fulfillment, and execution of services that you have contracted with us on the Platform:** This purpose includes the processing of your data to, mainly:
 - a. Contact you with updates or informative communications related to the functionalities or services contracted.
 - b. Manage the payment of the services you purchase. For example: (l) If when contracting one of our services, you choose to activate the functionality of saving your payment data and shipping address for future purchases, we need to process the indicated data for the activation and development of said functionality. Consent to activate this functionality allows your payment data to be auto-filled in future purchases so that you do not have to re-enter them in each new process, and will be valid and in effect for subsequent purchases. You can delete your payment data by contacting us through Customer Service.
 - c. Activate the necessary mechanisms to prevent and detect the improper use of the Platform, for example, during the purchasing process, as well as potential fraud against you and/or against us during the purchasing process.

If we consider that the operation may be fraudulent or detect abnormal behaviors with indications of fraudulent use of our functionalities and services, this processing may have consequences such as blocking the transaction or canceling your user account.

- d. For billing purposes and to provide you with invoices for the purchases you have made on the Platform.
3. **To attend to the requests or petitions you make through the Customer Service channels:** We only process the personal data that are strictly necessary to manage or resolve your request or petition. If you use the telephone channel, the call may be recorded to attend to your request and guarantee its quality.
4. **Usability and quality analysis to improve our services:** If you access our Platform, **Internaut S.A.S.** informs you that it will process your navigation data for analytical and statistical purposes, that is, to understand how users interact with the Platform and thus be able to introduce improvements.

3. What is the legal basis for processing your data?

The legal basis that allows us to process your personal data also depends on the purpose for which we process it. Therefore, we explain the purposes as follows:

1. **Managing your registration as a user of the Platform:** The processing of your data is necessary for the performance of the terms that regulate the use of the Platform. In other words, for you to register as an user on the Joinnexus Platform, we need to process your personal data, as otherwise, we could not manage your registration.
2. **For the development, fulfillment, and execution of services that you have contracted with us on the Platform:** The processing of your data is necessary for the performance of the service that links us to you. It is possible that some data processing associated with the purchasing process may be activated only because you request it or authorize us to do so, such as the storage of payment data for future purchases. In these cases, the basis on which we process your data is your own consent. Additionally, we process your location data when you give us your consent. We consider that we have a legitimate interest in carrying out the necessary checks to detect and prevent possible fraud or fraudulent use when you use the Platform.

3. **Customer Service:** We consider that we have a legitimate interest in attending to the requests or inquiries that you may make through the various existing contact channels. We understand that the processing of this data is also beneficial for you, as it allows us to properly assist you and resolve the inquiries raised.
4. **Usability and Quality Analysis:** We consider that **Internaut S.A.S** has a legitimate interest in analyzing the usability of the Platform and the degree of user satisfaction, as we understand that the processing of this data is also beneficial for you because the purpose is to improve the user experience and offer a higher quality service.

4. How long will we keep your data?

The Personal Data that is stored, used, or transmitted will remain in **Internaut S.A.S.**'s databases for as long as necessary to fulfill the purposes outlined in this policy or for the Company to comply with its legal obligations.

However, the information will be reviewed every year to verify the accuracy of the data and the purpose of continuing its treatment.

The retention period of your data will depend on the purposes for which we process them, as explained below:

1. **Managing your registration as a user of the Platform:** **Internaut S.A.S.** will process your data for as long as you maintain the status of a registered user (that is until you decide to unsubscribe).
2. **For the development, fulfillment, and execution of services that you have contracted with us on the Platform:** We will process your data for the time necessary to manage the purchase of the services you have acquired, including complaints or claims associated with the purchase of the particular service. In some cases, we will only process the data until the moment you decide, such as in the case of payment data that you have requested us to store for possible future purchases (if this functionality is available).
3. **Customer Service:** We will process your data for as long as necessary to attend to your request or inquiry.
4. **Usability and Quality Analysis:** **Internaut S.A.S** will process your data punctually during the time we proceed to carry out a specific quality action or survey, or until we anonymize your browsing data.

Regardless of whether we process your data for the strictly necessary time to fulfill the corresponding purpose, we will keep them properly stored and protected for the time in which liabilities may arise from the processing, in compliance with the current regulations at each moment. Once the possible actions in each case have been prescribed, we will proceed to the deletion of personal data by anonymizing them.

5. Principles to which the processing is subject

The processing of personal data carried out on the occasion of this Privacy Policy, cookies and personal data treatment, must be strictly governed by the following principles:

- **Legality.**
- **Purpose:** The purpose of the processing must be legitimate, temporary, and informed to the data subject.
- **Freedom:** Data may only be processed with the prior, express, informed, and self-determined consent of the data subject.
- **Truth or quality:** Information must be truthful, complete, accurate, up-to-date, verifiable, and understandable.
- **Transparency:** The data subject's right to request information from the data controller about their data at any time and without restrictions must be guaranteed.
- **Security:** Information must be handled with the necessary measures to provide security to the records and prevent their alteration, loss, consultation, unauthorized or fraudulent use, or access.
- **Confidentiality:** Personal data that is not public is confidential and may only be provided by the law. Anyone involved in processing the information must guarantee its confidential nature.

6. Will we share your data with third parties?

To fulfill the purposes set out in this Privacy Policy, cookies, and personal data processing, it is necessary to give access to your personal data to third parties that provide support in the services we offer you, namely:

- Payment gateways such as [PayU](#).
- Fraud detection and prevention entities.
- Technological service providers and analytics such as Google Analytics.

We inform you that we transfer your data with appropriate guarantees and always maintain the security of your data, as we use the most appropriate tools for data transfer.

7. What are your rights when you provide us with your data?

We are committed to respecting the confidentiality of your personal data and guaranteeing the exercise of your rights. You can exercise your rights free of charge by writing to us at a unique email address hello@joinnexus.io indicating the reason for your request and the right you want to exercise. If we consider it necessary to identify you, we may ask you for a copy of an identity document.

In particular, you have the right to:

- Request access to the data we have about you.
- Request that we rectify the data we already have.
- Request that we delete your data to the extent that it is no longer necessary for the purposes for which we need to process it as we have informed you above, or that we no longer have the legitimacy to do so.
- Request that we limit the processing of your data, which means that in certain cases you can ask us to temporarily suspend the processing of the data or to keep it beyond the necessary time when you may need it.

8. Processing of data of minors

The platform is intended for users over 18 years of age. Individuals under the age of 18 cannot use or register on the platform. While **INTERNAUT S.A.S** cannot control whether minors gain unauthorized access to the Services, access may be canceled without notice if the Company deems that the services are being used by a minor.

9. Duties of the company as data controller

- A. Ensure, at all times, the full and effective exercise of the right to habeas data;
- B. Properly inform the Data Subject about the purpose of the collection and the rights they have by the authorization granted;
- C. Keep the information under the necessary security conditions to prevent its adulteration, loss, consultation, use, or unauthorized or fraudulent access;
- D. Update the information, communicating on time to the Data Processor all the news regarding the data that the Data Subject has previously provided and

take other necessary measures to ensure that the information provided to it remains updated;

- E. Rectify the information when it is incorrect and communicate the pertinent to the Data Processor;
- F. Require that the Data Processor respect, at all times, the security and privacy conditions of the Data Subject's information;
- G. Handle queries and complaints made in the terms set out in this policy;
- H. Provide, at the request of the Data Subject, information about the use given to their data.

10. Transfer and international transfer of data

When data is sent or transferred to another country, it will be necessary to have the authorization of the owner of the information that is the subject of the transfer. In this sense, before sending personal data to another country, the user is obliged to comply with this policy, for which we have the prior, express, and unequivocal authorization of the owner to allow the transmission of their personal data. This transfer of personal data will only be made to third parties with whom **INTERNAUT S.A.S** has a contractual, commercial, and/or legal relationship.

11. Security of data

Our platform has all the necessary licensing, in all aspects of software development, infrastructure, and third-party tools. We have the required levels of licensing that adapt to the needs of each situation, and we have support from manufacturers and experts to ensure that the platform is secure.

12. Procedure for filing claims, inquiries, and complaints.

The user will have the following procedures for addressing questions, complaints, inquiries, claims, and suggestions:

Inquiries

The user will make inquiries through written communication or by email, in which:

1. The user must provide their identity, including their name and identification number.
2. The reason for the inquiry must be clearly and expressly specified.

3. The legitimate interest with which they are acting must be proven, including the appropriate supporting documents.
4. The physical or electronic address where the response to the request can be sent must be provided.
5. If the request is incomplete, the interested party will be required to correct any issues within five (5) days of receiving the claim. If two (2) months have passed since the date of the requirement and the applicant has not provided the requested information, it will be assumed that they have withdrawn the request.

Claims

The user or any other person with a legitimate interest who believes that the information contained in a database must be corrected, updated, deleted, or that authorization granted for processing must be revoked, may timely file a claim with the responsible area through physical or electronic means.

1. The claim must: i) include the identity of the claimant, stating their name and identification number; ii) specify the reason for the claim in a clear and express manner; iii) prove the legitimate interest of the claimant, attaching the appropriate supporting documents, and iv) indicate the physical or electronic address where the response to the request must be sent. If the claim is incomplete, "the interested party will be required to correct any issues within five (5) days of receiving it. If two (2) months have passed since the date of the requirement and the applicant has not provided the requested information, it will be assumed that they have withdrawn the claim".
2. "Once the complete claim is received, a note will be added to the database that says 'claim in process' and the reason for it, within a period not exceeding two (2) business days. This note must be maintained until the claim is decided."
3. The maximum term for addressing the claim will be fifteen (15) business days from the day following the receipt of the claim. If it is not possible to address it within that term, the interested party will be informed of the reasons for the delay and the date on which their claim will be resolved, which in no case may exceed eight (8) business days following the expiration of the first term.

13. Attention to consultations, complaints, and claims

INTERNAUT S.A.S has a department responsible for attending and resolving inquiries and claims from data subjects or persons authorized to do so through the following channels:

- Email: hello@joinnexus.io
- Whatsapp Line: +57 312 5256655

14. Modifications to the policy

We may modify the information contained in this Privacy Policy, cookies, and personal data processing when we deem it appropriate. If we do so, we will notify you through different means via the Platform or even communicate it to your email address when the change in question is significant for your privacy, so that you can review the changes, evaluate them, and, if necessary, object or unsubscribe from a service or functionality. In any case, we suggest that you review this Privacy Policy, cookies, and personal data processing from time to time in case of minor changes or the introduction of any interactive improvements.

15. Information about cookies

We use cookies and similar devices to facilitate your navigation on the Platform and to know how you interact with us. Please continue reading our Cookie Policy to learn in more detail about the cookies and similar devices we use, their purpose, and how to manage your preferences, as well as other relevant information.

COOKIE POLICY

BEFORE WE BEGIN...

In this Cookie Policy, you will find information about the use we make of cookies and similar devices that are installed on the devices of our customers and users. Sometimes, the use of cookies may be related to the processing of personal data, so we recommend that you consult our Privacy Policy, accessible on our Platform, if you want information on how we use the personal data of our customers and users, how to exercise your rights or the terminology we use to refer to our Platform (Web or App).

INFORMATION ABOUT COOKIES

What is a Cookie?

A Cookie is a small text file that a website, app, or other platform stores on your computer, tablet, smartphone, or any other similar device, with information about your navigation or use, such as a tag that identifies your device. Cookies are necessary, for example, to facilitate navigation and to know how users interact with the platforms, so that they can be improved. They are also very useful for offering

advertising based on user preferences, as well as for other purposes detailed below. Cookies do not damage your computer or device.

When we talk about "Cookies," we also refer to other similar technologies for the installation and/or collection of information on or about your device. Likewise, the term "Cookies" also applies to the use of fingerprinting techniques, that is, those combination techniques of information that help us identify your device. Sometimes, these technologies work together with cookies to collect and store information, either to provide you with certain functionalities or services on our Platform, or to show you advertising on third-party platforms, taking into account your navigation.

This explanation is a general overview of what is understood by Cookies for mere informational purposes.

Types of Cookies

Please review this section, which provides an overview of the types of cookies that can be used in an online environment.

Based on the owner of the Cookies, they can be classified as:

- a. **First-party Cookies:** These are sent to the user's computer or device from a computer or domain managed by the editor themselves, and from which the platform or service requested by the user is offered.
- b. **Third-party Cookies:** These are sent to the user's computer or device from a computer or domain that is not managed by the editor, but by another entity that processes data obtained through cookies.

Based on the purpose of the Cookie, they can be classified as:

- a. **Strictly necessary Cookies (technical):** These allow the user to navigate through a website, platform, or application and use the different options or services that exist in them, such as controlling traffic, identifying data or sessions, accessing restricted access sections or content, completing the purchase process of a service, managing payment, controlling fraud related to service security, using security elements during navigation, requesting registration or participation in an event, among others. Technical cookies, being strictly necessary, are downloaded by default when they allow the display of the platform or the provision of the service requested by the user.
- b. **Functionality or customization Cookies:** These cookies are those that allow remembering information so that the user accesses the service or platform with certain characteristics that can differentiate their experience from that of other users, such as language, etc.

- c. **Analytical Cookies:** These are those that allow quantifying the number of users and how they interact with the platform, in order to carry out statistical measurement and analysis of the use made by users, with the aim of introducing improvements based on the analysis of user usage data on the platform or service.
- d. **Behavioral advertising Cookies:** These are those that store information on the behavior of users obtained through the continued observation of their browsing habits, which allows development a specific profile to show advertising based on it.

What are Cookies used for on our Platform?

Cookies are an essential part of how our Platform works. The main purpose of our Cookies is to make your browsing experience more comfortable and efficient. We also use our Cookies to continuously improve our services and Platform.

In any case, in the Cookies we use, we never store sensitive information such as passwords, credit or debit card data, etc.

Who uses the information stored in the Cookies?

The information stored in the Cookies of our Platform is used exclusively by us.