



**GLOBIANCE SA de CV**  
**Privacy Policy**

September 2024

# PRIVACY POLICY

## **1. General Provisions**

- 1.1 These are the policies and principles of constituted and regulated by the laws of the Republic of El Salvador, regarding the processing of customer data (hereinafter, the “*Privacy Policy*”).
- 1.2 This Privacy Policy describes how we process your Data.
- 1.3 Specific details about the processing of your data may be provided in additional Customer Agreements you have with GLOBIANCE SA DE CV and through your use of our Services.
- 1.4 This Privacy Policy will apply if and/or when you enter into a customer agreement with GLOBIANCE SA DE CV , use our provided Services, send us a request, provide your consent to process your data, visit the GLOBIANCE SA DE CV website and/or download or use our API.
- 1.5 GLOBIANCE SA DE CV shall have the right to modify this Privacy Policy at our sole and absolute discretion at any time and in accordance with applicable laws and regulations.
- 1.6 We will inform all users of the modification of this Privacy Policy by means of a notification on our website.

## **2. Definitions and Interpretations**

- 2.1 “*Customer*” and/or “*You*” refers to any natural person and/or any representative of a natural or legal person, who uses, has used, or has expressed a desire to use our Services, who created an account, sent a request to GLOBIANCE SA DE CV and/or visited our website.
- 2.2 “*Data*” means any information provided to GLOBIANCE SA DE CV by a Client, representatives of Clients, any other person who has contacted GLOBIANCE SA DE CV and another person who has contacted Globiance; this includes data collected from public databases and/or through public channels.
- 2.3 “*Data Controller*”, “*we*”, and/or “*us*”, respectively, refer to **GLOBIANCE SA DE CV SA de CV**.
- 2.4 “*Data Processor*” means any person who processes Customer data on behalf of the Data Controller.
- 2.5 “*Active digital*”, “*cryptocurrency*” and/or “*digital currency*” refer to a digital representation of value that is based on the cryptographic protocol of a computer network.
- 2.6 “*Account*” means an account accessible to the Client offered and facilitated by Globiance.
- 2.7 “*Recipient*” means a natural and/or legal person, public authority, agency and/or other appropriate body, to which the Data is disclosed.
- 2.8 “*Processing (Customer Data)*” means any operation performed with Data, including, but not limited to, collection, recording, organization, storage, alteration, publication, use, transmission, deletion, etc. of Customer Data.
- 2.9 “*Service(s)*” means any service provided by GLOBIANCE SA DE CV to Customers through any service channel, including, but not limited to, websites, applications and/or tools.
- 2.10 “*Agreement Client*” means any legal relationship between GLOBIANCE SA DE CV and Clients entered into to perform and/or provide any Services to Clients.
- 2.11 “*Application*” refers to any request submitted to GLOBIANCE SA DE CV by Clients for the purpose of entering into agreements, obtaining conclusions, making modifications and the termination and/or cancellation of the Services..

- 2.12 “Website” refers to the following GLOBIANCE SA DE CV websites and you must *also* understand the environment of our API.
- 2.13 “Regulations AML/CTF” refers to anti-money laundering (“AML”) and counter-terrorism financing (“CTF”) regulations.

### **3. General Principles of Data Processing**

- 3.1 GLOBIANCE SA DE CV strictly processes your Data under the terms and conditions established in this Privacy Policy and in accordance with the procedures provided for in the applicable legislation and regulations for GLOBIANCE SA DE CV SA de CV, a company incorporated and governed by the laws of the Republic of El Salvador.
- 3.2 We guarantee the confidentiality of all Data and ensure the implementation of appropriate technical and organizational measures to better safeguard your Data against unauthorized access, unlawful disclosure, accidental loss, unfounded modifications, destruction and/or any other unlawful processing. , all within the framework of appropriate and applicable data protection legislation.
- 3.3 GLOBIANCE SA DE CV will take all steps reasonably necessary to ensure that your Data is treated securely and in accordance with this Privacy Policy; and that no unauthorized transfers of your Data will take place to an organization and/or country unless there are adequate controls in place, including the security of your Data and other personal information.

### **4. What Data Does GLOBIANCE SA DE CV Collect?**

GLOBIANCE SA DE CV follows the following processes according to the different categories of Data:

<b>Personal Information</b>	Full name, alias, contact information, social security information, government identification documentation, location data, account numbers, educational history, purchase history, online and/or device identification, personal identification number, date of birth, place of birth and signature.
<b>Contact Information</b>	Residential address, contact number and email address.
<b>Financial Data</b>	Bank account information, transactions, liabilities, online payments, money transfers, payment methods, prices, quantities, time, authorization information, order activity history, etc.
<b>Data on Services Provided</b>	Transaction details (e.g., quantity, product, price), data on Customer agreements, data on compliance with agreements, data on violations of agreements, notices, service fees, queries, complaints and submitted requests.
<b>Identification Data</b>	Data contained in identity documents (e.g., full name, issuing country, unique identification number, expiration date, barcode information, etc.), photographs taken of you, videos and sound recordings, electronic signature data and/or any other data received. through third-party identification services.
<b>Data Related to Regulatory Compliance</b>	Photographic identification of the client, country of residence, identity documentation data, origin of funds, origin of assets, place of work, position, occupation, data related to the identification and classification of Politically Exposed Persons (hereinafter “PEPs”).
<b>Communication Data</b>	Requests, records of communication data collected through any communication channel used with GLOBIANCE SA DE CV , including,

but not limited to, communications by telephone, email, online live chat functions and/or any other form of communication.

<b>Service Usage Information</b>	Access dates and times, device types, device identification information, operating systems and hardware configurations, browser types and information derived from SIM cards, network operators, IP addresses and/or GPS.
<b>Other Data</b>	Data obtained in compliance with obligations derived from the law, including data derived from investigations carried out by investigative bodies, notaries, tax authorities, courts, police and other state institutions.

## **5. How Does GLOBIANCE SA DE CV Process My Data?**

- 5.1 GLOBIANCE SA DE CV processes your Data to provide you with our Service(s), establish a Customer Agreement with you, respond to your request(s) and communicate with you, as well as to perform necessary Get to know you tasks. Customer (hereinafter referred to as “KYC”) and customer due diligence obligations (hereinafter referred to as “CDD”) arising from applicable laws and regulations.
- 5.2 To create an account, GLOBIANCE SA DE CV processes your personal data, contact data, location data and communication data. The legal basis for the processing of said data is your consent. You can withdraw your consent at any time and GLOBIANCE SA DE CV will not do so; however, please note that this will affect the provision of our Service(s) to you. We will not maintain or continue business relationships with any Client who does not provide the necessary consent for GLOBIANCE SA DE CV to process such Data.
- 5.3 In order to use the GLOBIANCE SA DE CV Platform and Services , you must undergo the general registration processes provided for on our Sites. This includes, but is not limited to, undergoing the applicable KYC and CDD verification procedures that GLOBIANCE SA DE CV deems appropriate for your particular application. For these purposes, GLOBIANCE SA DE CV processes your identification data, as well as data obtained, received and/or generated in the course of complying with our legal obligation(s) for proper identification verification. If you do not provide such data, GLOBIANCE SA DE CV cannot activate your account and/or provide you with our Service(s).
- 5.4 GLOBIANCE SA DE CV processes your personal data, contact data and communication data to communicate and enter into a Customer Agreement with you. These data are mandatory to enter into an agreement with the client. The legal basis for the processing of said data is the express establishment of a Customer Agreement. If you do not provide such data, GLOBIANCE SA DE CV cannot and will not provide you with our Services.
- 5.5 GLOBIANCE SA DE CV processes your financial data, data related to the Services provided to you, communication data and data obtained, received and/or generated in the course of complying with our legal obligation(s) to celebrate and establish an Agreement with the Client. This includes, but is not limited to, reviewing, investigating and preventing any potentially prohibited and/or illegal activities that may violate the Customer Agreement. The legal basis for the processing of said data is the express establishment of a Customer Agreement. If you do not provide such data, GLOBIANCE SA DE CV cannot and will not provide you with our Services.
- 5.6 GLOBIANCE SA DE CV processes Data related to AML and CTF regulations to verify and verify your identity and maintain current, correct and up-to-date records of your Data. This is necessary to comply with the rules and regulations applicable to GLOBIANCE SA DE CV . We will explain the content and requirements of such Data to you each time we collect it from you. GLOBIANCE SA DE CV reserves the right to modify and/or update the content and requirements of the information and Data we require to collect in order to comply with regulatory obligations and constantly changing internal policies. The processing of this Data is vital for GLOBIANCE SA DE CV to ensure greater compliance with legal obligations arising from the regulations to which we are subject and to fulfill our legitimate and express internal interest. If you do not provide such data, GLOBIANCE SA DE CV cannot and will not provide you with our Services.

- 5.7 When you access your GLOBIANCE SA DE CV account, visit our Site(s) and/or make use of our Service(s), we may process your service usage information and location data to ensure that our interface is accessible to you and/or to personalize, measure and improve our Services, the content of our Sites, as well as for the development of new Services. The legal basis for processing such Data is our express legitimate internal interest.
- 5.8 GLOBIANCE SA DE CV processes data related to your full name and email address based on your consent to send you information about our Service(s), updates applicable to our policies and procedures that concern you, as well as to provide you with marketing messages. Your consent contains information about specific assignments and processing activities. You may withdraw your consent at any time and GLOBIANCE SA DE CV will refrain from doing so.

## **6. How Does GLOBIANCE SA DE CV Collect My Data?**

- 6.1 Most of the data that GLOBIANCE SA DE CV collects and processes is provided directly by you. We collect and process your information in the following situations:
- i. When you visit our website, create an account, log in and/or use our Service(s);
  - ii. When we provide Services to you and/or fulfill our current obligations;
  - iii. When you communicate and/or provide feedback to us via email, live chat or any other communication channel;
  - iv. When you enable the use of Cookies when visiting and/or using our website and services; and
  - v. Other situations in which we may collect your data as set forth in this Privacy Policy.
- 6.2 GLOBIANCE SA DE CV may also collect information about you from public and/or third party sources, such as public databases, identification verification partners, payment providers, companies providing money laundering and terrorist financing detection services, anti-money laundering, credit risk, blockchain data, marketing partners, as well as through the use of other fraud and financial crime prevention tools and companies that provide similar services.

## **7. Does GLOBIANCE SA DE CV Use “Cookies”?**

- 7.1 Yes. We use cookies every time you visit our site(s).
- 7.2 You can choose to have your respective device notify you each time a Cookie is sent. Please contact the help center of your respective device or web browser for the processes to follow to achieve this setup.

## **8. Third Party Disclosures**

- 8.1 GLOBIANCE SA DE CV does not trade, sell or otherwise transfer your Data to other parties unless you provide us with your explicit consent to transfer such Data.
- 8.2 GLOBIANCE SA DE CV only discloses Data to our relative Recipients, such as:
- i. Identification and verification partners, as well as fraud management partners, to perform identification verification and comply with our legal obligations with the authorities of the various countries in which it may operate and especially those of the Republic of El Salvador;
  - ii. Our website hosting partners and other parties who help GLOBIANCE SA DE CV operate our Site(s);
  - iii. respective payment service providers;
  - iv. Companies providing services for the detection of possible money laundering and terrorist financing risks, credit risk reduction service providers, relevant financial institutions, credit reference agencies, regulatory bodies, other fraud and financial crime prevention tools and companies that provide similar services with whom it is necessary to share such Data;
  - v. Partners who provide accounting services to us;

- vi. Financial and legal advisors, auditors and/or any other processors of the Data Controller;
  - vii. Data related to the violation of a Client Agreement with debt collectors to collect necessary funds.
- 8.3 GLOBIANCE SA DE CV may disclose your information to public authorities and/or state institutions from time to time if and/or when we believe that such disclosure of Data is appropriate to comply with the law or protect the rights, property and/or safety of GLOBIANCE SA DE CV or others. These include, but are not limited to, law enforcement agencies, bailiffs, notaries, tax authorities, supervisory authorities, the police and/or other authorities.
- 8.4 GLOBIANCE SA DE CV will not disclose more Data than is necessary for the purposes of the respective Data disclosure and in respect of applicable regulatory legislation and data protection regulations.

## **9. Conservation of My Data**

- 9.1 GLOBIANCE SA DE CV will retain your Data only for as long as reasonably necessary for the purposes set out in this Privacy Policy, or as required by applicable regulatory legislation and/or data protection regulations.
- 9.2 GLOBIANCE SA DE CV retains your Data for the proper establishment and performance of a Customer Agreement between you and Globiance. Such retention period extends to **five (5) years** from the date of termination of your Customer Agreement with GLOBIANCE SA DE CV . We retain your AML and KYC related data for **five (5) years** from the date of termination of your Customer Agreement and ultimately our business relationship with you.
- 9.3 GLOBIANCE SA DE CV will retain and use your Data only to the extent necessary to comply with our legal obligations. This includes, but is not limited to, whether we are required to retain your Data to comply with applicable data retention laws, resolve disputes, and/or enforce our internal Agreements and Policies.

## **10. My Data Protection Rights**

You have the following rights in relation to the protection of your Data:

- 10.1 To request any correction of incorrect and/or incomplete information and Data;
- 10.2 To obtain information about whether or not GLOBIANCE SA DE CV processes your Data, please examine your Data held by GLOBIANCE SA DE CV and/or receive a copy of it;
- 10.3 To provide objections to the processing of your Data if the use of such Data is based purely on Globiance's legitimate interests;
- 10.4 To request deletion of your Data, for example if you have withdrawn your consent. The aforementioned right will not apply if the Data whose deletion is requested is processed and collected based on legal reasons and must be retained by Globiance;
- 10.5 To restrict the processing of your Data, for example at the time GLOBIANCE SA DE CV assesses whether you have the appropriate right to request deletion of your Data;
- 10.6 Withdraw your consent to the processing of your Data if the processing is carried out on the basis of explicit consent. In such case, the withdrawal of consent will not affect the legality of the processing that took place before the withdrawal of consent;
- 10.7 To file complaints about the use of your Data, contact our [customersupport@globiance.com](mailto:customersupport@globiance.com) and we will channel your situation to investigate; and
- 10.8 Submit complaints and/or submit requests to our compliance department.

**11. Do Not Sell My Personal Data**

GLOBIANCE SA DE CV does not sell any personal data provided through the activation and/or provision of our Service(s).

**12. How Do I Contact Globiance?**

Please contact us if you have any questions about this Privacy Policy and the handling of your Data by writing to us. We will respond within a reasonable time.

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