

## **PRIVACY POLICY**

DIGITAL HORIZON's privacy policy guidelines fully comply with the commitment to ensure the application of the principles of the Personal Data Protection Act to its customers, partners, professionals or any institution or person who has a relationship with the organization.

The privacy and security of the user's personal data is of great importance to us. That's why we transparently explain how we collect, store, share and use your personal data.

This document aims to clarify the rights and duties of persons relating to data processing rules, including, for example, data collection, production, reception, classification, use, access, reproduction, transmission, distribution, processing, archiving, storage, deletion, evaluation or control of information, modification, communication, transfer, disclosure or extraction of collected data users, in addition to recording their activities in accordance with applicable laws.

**When you accept this privacy policy, you express your free and express agreement with the terms set forth herein.**

By using the DIGITAL HORIZON application the user expressly guarantees that he/she is fully capable (over 18 years of age without any legal impediment) to exercise and enjoy all services.

### **1. IMPORTANT DEFINITIONS**

For the purposes of this document, the following definitions and descriptions should be considered for a better understanding:

**USER:** person who accesses or interacts with the functionalities offered by the websites, applications and services offered by DIGITAL HORIZON. The user must have legal capacity to accept and consent to this PRIVACY POLICY and other documents of the organization.

**ACCOUNT:** is how the user is represented by accessing the functionalities of the website, applications and services offered by DIGITAL HORIZON, usually corresponding to a set of data representing the user (such as registration data) and other relevant data to ensure a more adequate and complete relationship between DIGITAL HORIZON and the user.

**COOKIES:** small files or data packets sent by DIGITAL HORIZON to the user's device to identify and collect information that helps DIGITAL HORIZON to improve the services provided to the user.

**PERSONAL DATA:** information relating to an identified or identifiable natural person. They may include, for example, name, address, email, phone number, identification number, debit/credit card number, IP address.

**RESPONSIBLE:** natural or legal person designated by DIGITAL HORIZON responsible for acting as a communication channel between the controller, stakeholders and the Data Protection Authority.

**DATABASE:** Structured set of personal data located in one or more locations, in electronic or physical form.

**CONSENT:** it is the free, informed, and unambiguous manifestation through which the user accepts the use of his personal data.

## **1. INFORMATION ON DATA COLLECTION**

### **1.1 WHAT KIND OF INFORMATION DO WE COLLECT?**

Personal data will be collected when they are voluntarily entered or sent by the user on the website, applications and services offered by DIGITAL HORIZON, such as account creation, navigation, interaction with content and acquisition of services.

Personal Data will also be collected that is sent in an automated manner and without the need for any action by the user, such as through Cookies or partners who have obtained authorization to share personal data with DIGITAL HORIZON.

DIGITAL HORIZON treats users' personal data as necessary to comply with their legal and contractual obligations, operate businesses, and provide the products and services that user's use.

The legal basis for the processing of personal data will be the consent given when registering and registering on the platform, expressly accepting these provisions.

### **INFORMATION AND CONTENT YOU PROVIDE**

We collect the content, communications and other information you provide when you register to create an account: full name, your documentary identification number, date of birth, email address, phone number, and more.

### **REGISTRATION INFORMATION**

We collect information from and about the computers, phones and other web-connected devices you use when accessing our platform that integrates with our payment gateway, and combine that information from the different devices you use.

The information we obtain from these devices includes:

- a) Device attributes: Information such as operating system, hardware and software versions, battery level, signal strength, available storage space, browser type, file and application names and types, and add-ons.
- b) Network and connections: Information such as the name of your mobile operator or Internet service provider, language, time zone, mobile phone number, IP address, connection speed.
- c) Device signals: Bluetooth signals and information about nearby Wi-Fi hotspots, beacons, and cell towers.

- d) **Device configuration data:** Information that allows us to receive through the settings of the device you activate, such as access to your GPS location, camera, or photos.

## **1.2 HOW DO WE USE THIS INFORMATION?**

**Device Access /Login Creation:** Personal data collected when creating your account will be used for identification and authentication of use on our services. This way, you can use the same account information to connect from any location or device.

**Improve our products and services:** Your personal data will be used to create a profile about you, understand how you use our products and services, develop new products and services that are more interesting and relevant, as well as customize the products and services we already offer you.

**Process your operation:** Use the personal data described above to process, deliver and report on the status of your operations.

**Perform checks:** We will also use your personal data to assess its suitability and prevent fraud.

**In Customer Service:** if you contact our Customer Service Channels, we will use your personal data to process your request and offer you the best possible service/solution.

**For marketing actions:** When you sign up to receive newsletters from DIGITAL HORIZON to create an account, request or provide feedback about an online product or service, or use our applications, we will use your personal data to create a profile based on the information we have about you. We create your profile according to your preferences to offer you the best personalized experience and send personalized marketing messages and newsletters, as well as for opinion research. To achieve these objectives, DIGITAL HORIZON uses your personal data in accordance with how you interact with our brand through all the different channels described above and the information we collect about them, through each of these channels, is related to both your interests and preferences. This perception allows us to offer the best possible experience. If you have allowed us to send you marketing communications, we will use the information you have provided to us when interacting with us to send messages of this nature, but in a personalized way, about the products or services, discounts, gifts, events and commercial promotions made by DIGITAL HORIZON. In some circumstances, we will also combine your personal information with that of others to create comprehensive reports on how customers use our products and services and experience our brand, but for statistical reasons we will use your personal data anonymously. In addition, we will send direct marketing communications through the channel you choose and authorize, such as email, phone or social networks. As we mentioned, the messages we transmit will be customized and customized according to your individual preferences and interests. We use analytical data to generate these custom messages. These direct marketing messages may contain information about DIGITAL HORIZON products and services, events, sweepstakes or promotions and news. We will also use, under certain

circumstances, channels for opinion polls, as well as to learn more about your experience.

**Redirection:** Our applications use redirection technologies. This ensures that we show our visitors, who have already shown an interest in our products and/or services, our advertisements on other websites. We believe that serving interest-based personalized ads is more interesting and relevant to our customers than the ad service that has no personal connection. Redirect technologies analyze the information we collect about your interactions, as described above, with respect to marketing actions, including your cookies, and display ads based on your previous web browsing behavior.

**Enriching our data:** By obtaining your information from various sources, we combine this information, in some circumstances, to enrich our understanding of your preferences regarding our products and services, in order to improve your experience by sending you personalized marketing or preparing more effective marketing campaigns.

**Improvement of our products and services:** We use the personal data we have about you to conduct our analysis and research, including: data science or analysis, in which we combine information (personal and/or confidential obtained from the use of a Training application or your browsing history, navigation, for example) that we maintain on a large scale, in order to learn more about our customers and their preferences, identifying their patterns and trends, improving the user experience on our websites, providing information, content and offers tailored to the needs of individualized, generic research and statistical purposes, or even for the purposes of aggregate dwellers of DIGITAL HORIZON . It can also help us develop new products and services, monitor their performance and/or improve our technology.

**Website:** The personal data collected through our website will be used to evaluate browsing behaviors on our website, understand where we can improve, optimize our products and services, as well as personalize and improve your experience on our website.

We will ask for your permission if we want to use your personal data for purposes other than those mentioned in this Privacy Policy.

### **1.3 IS YOUR INFORMATION SHARED?**

DIGITAL HORIZON operates with financial transaction and payment automation routines, so you can work together with other companies to deliver the services correctly. The exchange of personal data may involve companies such as payment processors, fraud prevention agents and agencies. Your information is shared with others as follows:

**Service Providers and Suppliers:** We work with third-party partners who help us deliver and improve our payment port. We stress that we impose strong restrictions on how our partners can use and disclose the data we provide. We provide information and content to suppliers and service providers that enable the operation of our business, whether providing technical infrastructure services, analyzing how our

platform is used, providing customer service, facilitating payments or conducting surveys.

**Law enforcement or legal requests:** DIGITAL HORIZON may also share your information with law enforcement or judicial authorities, competent public authorities or other third parties, both inside and outside the country in which you reside, if necessary, by applicable law, court decision and request by the authorities, or if necessary to respond to legal proceedings or to participate in any dispute or dispute of any nature.

**With Group companies:** We can share the data we collect with DIGITAL HORIZON companies. The same guarantees and care that DIGITAL HORIZON has with your data will be replicated by DIGITAL HORIZON group companies. The exchange of data with DIGITAL HORIZON Group companies will have the following purposes: development of new products and services, offer of products and services that best suits your interests, generation of statistical and aggregate data on the use of our products and services and user profiles.

#### **1.4 DO WE TRANSFER YOUR DATA TO OTHER COUNTRIES?**

We may make international data transfers to other countries in order to carry out some activities related to the services provided to you, as well as to obtain information that may contribute to the improvement of our services.

In any case of sharing with partners located in other countries, we have found that the partner is denied that the standard of data protection and information security is compatible with this privacy policy, so your data is always protected in these terms.

## **2. HOW DO WE PROTECT YOUR INFORMATION?**

DIGITAL HORIZON employs its best efforts to respect and protect your personal information from loss, theft or any form of misuse, as well as against unauthorized access, disclosure, alteration and destruction.

We only process your data through a high degree of security, implementing best practices in use in the industry for data protection, such as encryption techniques, monitoring and periodic security testing. However, it is not possible to fully guarantee the non-occurrence of interceptions and breaches of DIGITAL HORIZON systems and databases, as the Internet has its security structure constantly improving.

## **3. HOW LONG IS THE INFORMATION STORED?**

DIGITAL HORIZON stores your information for the period necessary for the purposes set out in the DIGITAL HORIZON Terms and Conditions of Use and this Privacy Policy, respecting the data retention period determined by applicable law.

If you request the deletion of your account, your personal information provided to DIGITAL HORIZON during the use of our services will be permanently deleted from the required legislation.

In some cases, we may retain your information even if you delete your account, such as in the mandatory records that must be kept in accordance with applicable law, if there is an unresolved issue related to your account (such as a claim or unresolved dispute), or if it is necessary for our legitimate business interests, how to prevent fraud and improve the security of our users.

#### **4. WHAT ARE YOUR RIGHTS IN RELATION TO YOUR PERSONAL DATA?**

The holder of the personal data has the right to obtain from the data controller, in relation to the data of the interested party, processed, at any time and on request:

- Right of access: the right of the data subject to obtain confirmation of the processing of his/her data from the controller and, in addition, to request access to his/her personal data.
- Right to rectification: the right of the holder to ensure that his/her personal data is accurate and up to date if necessary.
- Right to exclusion or forgetfulness: the right of the data subject to ask the controller to delete his/her personal data without undue delay.
- Right of opposition and limitation of processing: the right of the owner to oppose the processing of his data and even restrict them if they so wish.
- Right to data portability: the right of the data subject to obtain its information in a structured and machine-readable format or to transfer your data to another organization, if possible.
- Right to information: the owner's right to be informed about how and why their personal data is being processed.
- Right to notification: In the event of a data breach, data subjects shall be informed within 72 hours of their attention to the breach.

Please contact the DIGITAL HORIZON Data Protection Officer if you have any questions about how we process your personal data or if you wish to exercise any of your rights in relation to your personal data.

The contact of the person responsible is the support address **support@digitalhorizon.sv**

If, despite DIGITAL HORIZON's commitment and efforts to protect your personal data, you find that your data privacy rights have been violated, we recommend that you first look up DIGITAL HORIZON to resolve any issues.

#### **5. UPDATE THIS POLICY**

DIGITAL HORIZON may modify this Privacy Policy at any time due to changes/updates to its platform or the technologies associated with it, as well as, whenever it deems necessary, to improve and improve the services provided.

If there are updates to this document, DIGITAL HORIZON will notify the user through the tools available on the websites, applications and services provided and/or means of contact provided by the user. The user will be bound by the new terms of this document from the delivery of the notification of the updates.

The new Privacy Policy will take effect 10 (ten) days after its publication on the site. Within 5 (five) days after the publication of the new version, the user must communicate by email if he does not agree to the modified terms. In this case, the contractual link will cease to exist, provided that there are no outstanding accounts or debts. If there is no manifestation within the stipulated period, it is understood that the user has accepted the new terms of the Privacy Policy and the contract will continue to bind the parties.

### **HOW TO CONTACT US**

If you have any questions or concerns regarding DIGITAL HORIZON's Privacy Policy or any practices described herein, please contact us via the "CONTACT" tab on the DIGITAL HORIZON website. For your request to be properly reviewed by us, you must contain at least the following information:

- Full name;
- Type and number of identification document;
- Contact phone number;
- e-mail (the same used in the DIGITAL HORIZON Register)
- description of the doubt or reasons for any request.

Last revised date: May 30, 2022.