

# PRIVACY POLICY

## 1. PERSONAL DATA

Personal data may be collected directly from the User, obtained through third parties, or collected automatically. The personal data may include: (a) registration information, such as email, full name, address, phone, and cell phone number, National ID, Driver's License, profile picture and passport numbers; and (b) banking information, such as the name of the financial institution in which the User has a bank account, account number, type of account, branch, IBAN and credit card information, including the holder's name, expiration date, and CVV number.

### 1.1. PERSONAL DATA COLLECTED DIRECTLY FROM THE USER

IPS may collect personal data directly from you relating to registration and banking information.

### 1.2. PERSONAL DATA OBTAINED FROM THIRD PARTIES

IPS may have access to certain personal data through third parties, such as registration or banking information. This happens, for example, when IPS - as a result of compliance with legal or regulatory obligations - needs to consult databases maintained by third parties, which allow the analysis of credit restrictions, anti-fraud analyses and other risk management analyses integrated to the Platform.

### 1.3. PERSONAL DATA AUTOMATICALLY COLLECTED WHEN ACCESSING THE PLATFORM

Personal data is automatically collected when you access the Platform, even if you do not have an account. This information may include the following examples:

#### 1.3.1. PAYMENT TRANSACTION INFORMATION

The payment instrument used, the transaction's date and time, payment amount, expiration date of the payment instrument, billing postal code, IBAN information, address, and other details related to the payment transaction.

#### 1.3.2. ACCESS OR USE INFORMATION

Pages and content you view, ad searches, frequency of Platform use, browser information, connection data, purchase, and browsing history.

#### 1.3.3. LOG DATA AND DEVICE INFORMATION

Details about how you have accessed and used the Platform (including the links accessed), IP address, access times and dates, hardware and software information, device information, device event information, exclusive identifiers (e.g., IPS ID).

## THE PURPOSES OF PERSONAL DATA PROCESSING

2. Purpose of processing the User's Personal Data. IPS uses personal data for the following purposes:

2.1 Provide and develop the Platform:

- Customize the Platform according to your browsing experience.
- Conduct analysis and studies related to behaviour, interests, and demographics.

- Improve the Platform
- Update registration
- Send messages, account updates, and notifications
- Perform User support activities
- Allow the User to publish their content

## 2.2 PROVIDE AND OPTIMIZE ADVERTISING AND MARKETING ACTIVITIES

- Send newsletters
- Send communications via email, SMS
- Send educational materials or ebooks
- Carry out media campaigns with a focus on advertising and promotions
- Send communication, such as e-mail marketing, remarketing, and other advertising campaigns in media channels

## 2.3 ENABLE PAYMENT SERVICES

- Perform payment-related communication, such as sending transactional emails
- Participate in agreements with the card companies
- Accredit and issue payment instruments
- Manage payment accounts
- Perform the remittance of funds

## 2.4 MAINTAIN A SECURE ENVIRONMENT

- Perform authentication on the Platform
- Verify the authenticity of the data and documents provided, including by means of processing and cross-checking
- Send announcements
- Perform analysis activities to prevent fraud, security incidents, and abuse on the Platform
- Registration verification
- Content verification

## PERSONAL DATA WITHHOLDING PERIOD

### 3. PROCESSING PERIOD

The personal data is processed by IPS until at least one of the assumptions described below has been reached. These are:

- The achievement of the processing purpose
- The personal data is no longer necessary or pertinent to the achievement of the specific intended purpose
- Termination of the Agreement with the User for whatever reason

### 3.2. RETENTION OF PERSONAL DATA.

In certain situations, IPS and IPS' third-party may withhold residual personal data even after the processing of the personal data has ceased due to compliance with a legal

or regulatory obligation, or in circumstances where IPS or such third parties have a legitimate purpose. In such cases, the personal data will be stored in a secure place with restricted access and for the time necessary to comply with the legal or regulatory obligation, or the end of IPS and the third parties' legitimate purpose.

#### 4. INTERNATIONAL TRANSFERS

IPS and its third-party may transfer your personal data to countries other than the one where you are located. In such case, the international transfer of personal data will be to a country that provides an adequate level of personal data protection. IPS and its third-party shall take the measures required by law to ensure that such personal data is protected and that the transfer is carried out in accordance with one of the transfer mechanisms provided for by applicable law.

#### 5.PROCESSING THE PERSONAL DATA OF MINORS

IPS does not knowingly collect or solicit personal data from anyone under the age of 13. If we become aware that the personal data of a minor under the age of 13 has been collected, we will cancel the account created on the Platform and delete the personal data, only keeping personal data that is intended to prevent a new registration attempt.