

## ABOUT IT DIGITAL IDEAS S.R.L. PRIVACY POLICY

✓ Last update: July 1st, 2021.

Welcome to **About It Digital Ideas SRL**, a company incorporated under the laws of the Republic of Paraguay. Our **Privacy Policy** explains how we collect, use, disclose and protect the information that applies to all of our services, especially messaging services through current and future channels under development, as well as the use of our website, applications. and content that we develop. Terms that are not defined in this **Privacy Policy** have the meanings given to them in our **Terms of Service**.

### Purpose of this Privacy Policy

This Privacy Policy discloses our personal information collection and dissemination practices with respect to our services. The Privacy Policy is incorporated into and is part of the **Terms of Service**. **PLEASE READ THIS PRIVACY POLICY CAREFULLY.**

We have also created this Privacy Policy to demonstrate our commitment to privacy beyond what national legislation requires of us. We recognize that when you provide us with information about yourself and your contacts, you trust us to act responsibly with that information.

**About It Digital Ideas** expressly undertakes to comply with the provisions of Law No. 1,682 / 2001 that regulates **PRIVATE INFORMATION IN THE REPUBLIC OF PARAGUAY**, for which the provisions of art. 4th and 6th of the aforementioned Law:

**Article 4.-** It is prohibited to publicize or disseminate sensitive data of people that are explicitly individualized or individualizable. Sensitive data refers to racial or ethnic belonging, political preferences, individual state of health, religious, philosophical or moral convictions; sexual intimacy and, in general, those that promote prejudice and discrimination, or affect the dignity, privacy, domestic intimacy and the private image of individuals or families.

**Article 6.-** The following may be published and disseminated:

- a) Data consisting only of name and surname, identity document, address, age, date and place of birth, marital status, occupation or profession, place of work and occupational telephone number;
- b) In the case of data requested by the affected party; and,
- c) When the information is collected in the exercise of their functions, by judicial magistrates, prosecutors, parliamentary committees or by other authorities legally empowered for that purpose.

**About It Digital Ideas** encourages its clients and interested parties to develop good practices in the use and processing of personal data, for which it agrees and collaborates with the principles set out below, which according to international criteria on data protection are adopted at the international level in their legal frameworks. While in Paraguay, until the legislation is adequate, **About It Digital Ideas** collects them as good practices and makes them explicit in the **PRIVACY POLICY** with the intention that it is shared and adopted by the parties with whom it relates both internally and externally.

### **Data accuracy principle**

Personal data will be accurate, complete and up-to-date. Those responsible and those in charge of the treatment must adopt all reasonable measures to correct errors, modify the data that turn out to be inaccurate or incomplete and guarantee the certainty of the information subject to treatment. When the personal data are no longer necessary for the fulfillment of the purposes that motivated their treatment, the person in charge will suppress or eliminate them from their files, records, databases, files or information systems, or, where appropriate, will submit them to an anonymization or pseudonymization procedure. In the deletion of personal data, the person in charge will implement methods and techniques aimed at the definitive and safe elimination of these.

### **Principle of legality of the treatment**

For the treatment to be lawful, personal data must be treated in accordance with the legal bases provided for in national law or those that apply as a result of commercial agreements with legislation where specific Laws for the Protection of Personal Data apply.

### **Principle of purpose**

Personal data must be collected and processed for specific, explicit, legitimate and limited-duration purposes, and will not be subsequently processed in a manner that is incompatible or different for those purposes.

### **Proportionality principle**

The person in charge will treat only the personal data that are adequate, pertinent and limited to the minimum necessary in relation to the purposes that justify their treatment. Likewise, the data must be subject to periodic review to determine if they continue to fulfill the purpose.

### **Loyalty principle**

Personal data may not be collected by fraudulent, deceptive, unfair and illegal means or methods. For such purposes, those processing of personal data that give rise to the publicity or dissemination of sensitive data will be considered unfair, as stipulated and expressly prohibited by art. 4th, of Law 1682/2001.

### **Principle of transparency**

The person in charge will inform the owner about the very existence and main characteristics of the treatment to which their personal data will be submitted, so that he can make informed decisions in this regard.

### **Limitation of the conservation period**

The data may not be kept or maintained for longer than is necessary for the purposes of the treatment. The subsequent processing of personal data for archival and public interest purposes, scientific and historical research purposes or statistical purposes will not be considered incompatible with the initial purposes, provided that they are anonymized or pseudo-anonymized.

### **Proactive responsibility principle**

The person in charge of the treatment must adopt the appropriate technical and organizational measures in order to guarantee an adequate treatment of personal data and compliance as far as possible with the principles contained in this **Privacy Policy**, in such a way that in case If necessary, it can be demonstrated that both **About It Digital Ideas** and the client have demonstrated proactivity and self-regulation in the implementation of effective measures and controls for their implementation, with the criteria of minimizing risks derived from the use of personal data.

### **Safety principle**

In the processing of personal data, technical and organizational measures must be adopted to guarantee the security of the data and whose purpose will be to avoid the alteration, loss, treatment or unauthorized access. In the case of data defined by Paraguayan legislation as sensitive data, additional measures will be adopted to guarantee their security. It is expressly forbidden to record personal data in media and channels provided by **About It Digital Ideas** from databases that do not meet technical conditions of integrity and security.

### **Principle of confidentiality**

Those responsible and in charge of the processing of personal data, as well as any person who intervenes in any phase of this, will be subject to the duty of confidentiality, an obligation that will continue even after the end of their relations with the owner. The general obligation indicated in the previous section will be complementary to the duties of professional secrecy in accordance with the provisions of article 174 of Law 1,160 / 97 "Penal Code". The obligated party may be relieved of the duty of confidentiality by decision of a judge or court.

### **DEFINITIONS:**

**Data Owner:** Natural person on whom the processing of its data is carried out.

**Personal Data:** data that collaborates to identify specific or determinable natural persons. The person who can be identified by means of an identifier or by one or more characteristic elements of the physical, physiological, genetic, mental, economic, cultural or social identity of said person will be understood as determinable. This also includes metadata and data chunks.

**Sensitive personal data:** are those referring to racial or ethnic belonging, political preferences, religious, philosophical or moral convictions; participation or affiliation in a trade union or political organization; information regarding health, preference or sexual life, biometric and genetic data linked to a natural person and, in general, those that promote unlawful or arbitrary prejudice and discrimination, or affect dignity, privacy, intimacy and private life of the person.

**Genetic Data:** Personal data related to the genetic characteristics inherited or acquired from a natural person that provide unique information about the physiology or health of that person, obtained in particular from the analysis of a biological sample of such person.

**Biometric Data:** Personal data obtained from a specific technical treatment, related to the physical, physiological or behavioral characteristics of a natural person that allow or confirm the unique identification of said person, such as facial images or fingerprint data.

**Treatment:** any operation or set of operations carried out through manual, automated or partially automated procedures carried out on personal data, related, but not limited to, with the obtaining, access, registration, organization, structuring, adaptation, indexing, modification, extraction, consultation, storage, conservation, blocking, elaboration, transfer, assignment, diffusion, possession, use and in general any use or disposition of personal data.

**Consent:** any manifestation of free, specific, informed and unequivocal will by which a natural person accepts and authorizes, either through a statement or a clear affirmative action carried out in writing or by electronic means, as well as by any similar form as technology allow, the processing of personal data that concerns you.

**Responsible for the Treatment:** The natural or legal person, public authority or other body that, alone or together with others, determines the purposes and means of data processing.

**Responsible for the Treatment:** The natural or legal person, public authority, or other body that processes personal data on behalf or mandate of the person responsible for the treatment.

**Representative:** natural or legal person established in the Republic of Paraguay who, having been designated in writing by the person in charge or the person in charge of the treatment, represents them with regard to their respective obligations under this law.

**International transfer:** the transmission of personal data outside the national territory.

**Profiling:** any form of automated and partially automated processing of personal data consisting of using personal data to evaluate certain aspects of a natural person, in particular to analyze or predict issues related to professional performance, financial situation, health, personal preferences, interests, reliability, behavior, location, ethnicity, race, sex or movements of said natural person.

**Binding self-regulation rules:** The personal data protection policies assumed by a person in charge or in charge of the treatment established in the national territory for transfers of personal data to a person in charge or in charge in one or more third countries, within a business group or a union. of companies engaged in a joint economic activity.

**Impact Assessment Relative to Data Protection:** Prior analysis of those data processing that may pose a high risk to people's rights and freedoms.

**Data blocking:** The identification and reservation of personal data in order to prevent its treatment.

**Public Access Source:** the one that contains information intended to be disseminated to the public, freely accessible and exchanged for reasons of general interest, in accordance with Law No. 5,282 / 2014 "Free citizen access to public information and government transparency."

## Information that About IT Digital Ideas SRL collects from users and how it is used

### How we record Information:

Before you can use the services we offer, we ask that you register with **About IT Digital Ideas SRL** and provide us with your email address, password, name, and other contact information. We request this information for identification purposes, to communicate with you about your account, and to facilitate the operation of certain services. In this way we can validate your registration and make sure that the user registration is the will of both parties. For the use of our services, you will be required to accept our **PRIVACY POLICY**, and this acceptance may be online through our platform or another service that you activate with us, and / or by printed or digital means and expressly signed.

### Correspondence

If you contact us by email, phone, text message, or other method, we may collect the information you submit into a file specific to you.

### Cookies policy

The web services provided by **About IT Digital Ideas SRL**, may use cookies when a user browses the site. Cookies are files sent to the browser through a web server in order to record the user's activities during their browsing time. The cookies used by the website are only associated with an anonymous user and their computer, and do not themselves provide the user's personal data.

Through the use of cookies, it is possible that the server where the web is located, recognize the web browser used by the user in order to make browsing easier, allowing, for example, access to users who have registered. previously, access sections of our site, services, publications and advertisements without having to register for each visit. They are also used to measure the audience and traffic parameters, control the progress and number of entries.

The user has the possibility of configuring his browser to be notified of the receipt of cookies and to prevent their installation on his computer. Please, consult the instructions and manuals of your browser to expand this information. To use the website, it is not necessary for the user to allow the installation of the cookies sent by the site, or the third party acting on their behalf, without prejudice to the need for the user to start a session as such in each of services whose provision requires prior registration or 'login'. The cookies used on this website are, in any case, temporary in nature with the sole purpose of making their subsequent transmission more efficient. In no case will cookies be used to collect personal information.

### Information collected with cookies

Like most major websites, **About IT Digital Ideas SRL** uses cookies on certain pages of our service. The information we collect with cookies enables us to statistically analyze service usage, improve our content and product offerings, improve our marketing and promotional efforts, and personalize the content, design, and services of our services.

In addition, **About IT Digital Ideas SRL** uses third-party providers, such as Google, to display advertisements for **About IT Digital Ideas SRL** on Internet sites. These third-party providers use cookies to serve ads based on your previous visits

to the **About IT Digital Ideas SRL** website. To opt out of these targeted advertisements, visit the Network Advertising Initiative opt-out page.

**The cookies used by About IT Digital Ideas SRL are the following:**

- **Google Analytics:** Google Analytics is the analytics tool that helps website and app owners understand how visitors interact with their properties. This tool may use a set of cookies to collect information and provide website usage statistics without personally identifying Google visitors. In addition to providing statistics on the use of websites, Google Analytics may also use, together with some of the advertising cookies, others to display more relevant ads on Google properties (e.g., in the Google search engine) and throughout the Web.

In addition, the user is informed that from the **About IT Digital Ideas** web services it is possible to access other external services managed by third parties, and unrelated to **About IT Digital Ideas** (Twitter, YouTube, ...) in which cookies can be used, being advisable for the user to verify in each case the policy on their use.

**Given this information, it is possible to carry out the following actions:**

- **Accept cookies.** This notice will not be displayed again when accessing any page of the portal during this session.
- **Modify the configuration.** You can obtain more information about what cookies are, learn about the **About IT Digital Ideas** Cookie Policy and modify your browser settings to restrict or block **About IT Digital Ideas** cookies at any time. In the case of restricting or blocking cookies, the functionalities of the web may be reduced.
- **Continue browsing or move through the scroll bar:** in which case we consider that you accept their use.

**How to modify the cookie settings**

You can restrict, block or delete cookies from any website, using your browser. In each browser the operation is different, the 'Help' function will show you how to do it.

Consult the technical information for your mobile device or browser for instructions on how to delete and disable cookies and other tracking / recording tools.

Depending on your device type, you may not be able to remove or disable the tracking mechanisms on your mobile device. Disabling cookies and / or other tracking tools prevents About IT Digital Ideas SRL or its business partners from tracking your browser activities in connection with the service. However, doing so may disable many of the features available through the Service. If you have any questions about opting out of the collection of cookies and other tracking tools, you can contact us directly at [info@aboutit.com.py](mailto:info@aboutit.com.py) .

**Analytical information**

**About IT Digital Ideas SRL** may directly collect analytical data or use third-party analytical tools to help us measure traffic and service usage trends. These tools collect information sent by your browser or mobile device, including the pages you visit and other information that helps us improve our services, as well as detect problems and opportunities for improvement.

### Log file information

The information in the log file is automatically reported by your browser or mobile device each time you access the service. When you use our service, our servers automatically record accesses to the webserver for the log file. These server logs may include information such as your web request, Internet Protocol (IP) address, browser type, referring / exit pages and URLs, number of clicks and how you interact with links in the service, domain names, landing pages, pages visited and other similar information.

### WHAT INFORMATION WE COMMUNICATE OR TRANSFER TO THIRD COUNTRIES OR INTERNATIONAL ORGANIZATIONS.

As a general rule, **About IT Digital Ideas** does not communicate personal data to third parties beyond those communications necessary for the provision of services, or derived from the legal requirements that apply to us.

### Information provided by the user

To implement the main functionality of the contracted service, **About IT Digital Ideas** stores the information that you provide directly to the service, including messages and contact information. Where appropriate, **About IT Digital Ideas** also stores information provided by your contacts through incoming calls and messages.

In cases where **About IT Digital Ideas** develops and uses Android cell phone applications, the application will send data from the Android phone to the **About IT Digital Ideas** servers to implement the main functionality of the **About IT SMS Gateway** application and allow **About IT Digital Ideas** provide support for any issues related to the application. The data sent to the servers of **About IT Digital Ideas** includes call logs and SMS and MMS messages, including the content of the messages and phone numbers with which you communicate, as well as information about the status of the phone, including the level of battery, power status, mobile network connectivity, operating system version, device manufacturer and model, phone number, country, and IP address.

### Commercial and marketing communications

The commercial and marketing communications that our clients send to their contacts, we understand that they do so with their express consent. In the event that any of them do not want to receive such communication, the client must respect this right and immediately cancel the sending of the commercial communication. Likewise, it is expressly stated that **About IT Digital Ideas** will collaborate at all times to respect the rights of access and cancellation of the service of the users of the different services and platforms, if the request reaches **About IT Digital Ideas**.

The databases of our clients are exclusively those of our clients and we respect said property at all times. Therefore, **About IT Digital Ideas** will not share, rent, sell or disclose in any way the information contained in our platform or in the different services to applications provided, except when we have your express permission to do so or it is required by law. and current legal provisions.

The information that we collect or receive from you, we use to communicate directly with you. We may send you emails containing newsletters, promotions and special offers. If you do not wish to receive such emails, you will be given the option to opt out and change your preferences immediately. We also use your information to send you service-related emails (for example, account verification, purchase and billing confirmations and reminders, technical and security notices). For certain service-related emails, the only way to unsubscribe is to cancel your account with **About IT Digital Ideas**.

### **Who has access to messages and contact information?**

You can use your account settings to control other users' access to information associated with your user account, such as messages and contact information. Generally, User Provided Information transmitted or stored by the service is only available to those with whom you choose to share such information.

However, please note that the messages transmitted through the service may be accessible to certain third-party organizations, such as mobile networks and SMS gateway services, which may be used to transmit the messages. These organizations may have their own rules, policies, and security measures that control who has access to the messages transmitted through their services.

**About IT Digital Ideas** employees and contractors do not have access to view messages or contact information associated with their user account. However, certain authorized **About IT Digital Ideas** employees and contractors have access to view some data associated with your user account, including profile settings, automated services, log messages, and summary statistics. In limited circumstances, **About IT Digital Ideas** employees or authorized contractors may access other information associated with your user account, including contacts or messages.

### **Security measures employed by About IT Digital Ideas**

To help protect the privacy of the data that you transmit through this Service, where personally identifiable information is requested, **About IT Digital Ideas** uses SSL / TLS to encrypt the information that is sent between your computer and **About IT Digital Ideas's** servers. All communication through the web app is encrypted, the certificates being valid by the Google Cloud provider.

Additionally, **About IT Digital Ideas** takes steps to protect the user data we collect from unauthorized access. All contact and user data are safe and accessible through the **About IT Digital Ideas** services, only through user accounts authenticated with a password, API key or other secure credential. If someone tries to log in with an invalid password multiple times for the same user account, the user account will be automatically locked for a period of time to prevent automatic manipulation of the user's passwords.

Users can also enable two-factor authentication via a time-based one-time password (TOTP) distributed by Google Authenticator, SMS, or voice call. Users can also enable a whitelist of Internet Protocol (IP) addresses that are allowed to access their data.

However, you should be aware that this Service and our services run on software, hardware, and networks, any component of which may, from time to time, require maintenance or experience security issues or breaches beyond our control.

### **Policy on children's users of About IT Digital Ideas SRL**

We do not collect or maintain personally identifiable information from individuals under the age of 18, and no part of our services is directed at individuals under the age of 18. **IF YOU ARE UNDER 18 YEARS OLD, DO NOT USE OR ACCESS OUR SERVICE AT ANY TIME.** If **About IT Digital Ideas SRL** learns that personally identifiable information has been collected from persons under the age of 18 without verifiable parental consent, **About IT Digital Ideas SRL** will take appropriate steps to delete this information and reserves the right to make the legal actions that apply. If you are a parent or guardian and discover that your child under the age of 18 has obtained an **About IT Digital Ideas SRL** account,



you can alert **About IT Digital Ideas SRL** at [info@aboutit.com.py](mailto:info@aboutit.com.py) and request that we delete the child's information of our systems.

#### **Where the information is stored and processed**

The **About IT Digital Ideas** servers, application, database and gateway are hosted in São Paulo, allowing low latency (jumps) of connection between the SMS gateway and the operators.

**About IT Digital Ideas** may transfer the information we collect about you, including personal information, to affiliated entities or other third parties across borders and from your country or jurisdiction to other countries or jurisdictions around the world. In this case, **About IT Digital Ideas** is in a position to guarantee data transfers in accordance with international legislation on the protection of personal data ("transfers of personal data to third countries or international organizations"). For which the client must notify **About IT Digital Ideas** of the provision of the service and the transfer to third countries, to make the necessary adaptations and the context of data processing.

Likewise, the client must provide sufficient information that not only accepts the transfer but will collaborate and coordinate with its parent company, subsidiaries, affiliates or service providers so that the conditions and terms of use remain unaltered and the privacy and protection policies are respected. of data according to what is described in this **Privacy Policy**.

#### **How you can correct or update the information that About IT Digital Ideas SRL collects about you?**

You can correct or update the information collected about you by contacting **About IT Digital Ideas** at [info@aboutit.com.py](mailto:info@aboutit.com.py) and at [soporte@aboutit.com.py](mailto:soporte@aboutit.com.py).

We will use reasonable efforts to update our records promptly. For our records, we may retain original and up-to-date information for reasons such as technical limitations, dispute resolution, problem solving, and compliance with agreements.

You can also stop receiving our promotional email communications by clicking the "unsubscribe link" provided in such communications. We will process all unsubscribe requests as quickly as possible. If you have any questions about how to review or modify your account information, you can contact us directly at [info@aboutit.com.py](mailto:info@aboutit.com.py).

#### **How long About IT Digital Ideas keeps your user content?**

In most cases, **About IT Digital Ideas** stores your user content until you delete it using the functionality provided in the **About IT Digital Ideas service**.

After you delete user content from the **About IT Digital Ideas** service, or after termination of your user account, **About IT Digital Ideas** may retain your user content for a commercially reasonable time for backup, archiving or audit. In no case may this time be longer than the accounting time established by law (national or international, where applicable).

### How you can be informed of changes to the Privacy Policy

About IT Digital Ideas SRL reserves the right to modify this **Privacy Policy** in accordance with the applicable legislation at all times. Please visit this page periodically to be informed of any changes. When we change the policy in a material way, we will update the "Update" date at the top of this page.

### Contact information

**Company Name: ABOUT IT DIGITAL IDEAS SRL**

**VAT N °: 80111883-2**

**Address: Cerro Corá c / Brasil.**

**City: Asunción**

**Country: Paraguay**

**Phone: +595 982 333 183**

**Email: [info@aboutit.com.py](mailto:info@aboutit.com.py)**

### Applicable law and jurisdiction

The resolution of conflicts, controversies or claims that may arise from the services referred to in this Privacy Policy will be governed by the provisions of Paraguayan legislation. About IT Digital Ideas SRL will submit to the Judges, Courts and jurisprudence of the city of Asunción, capital of the Republic of Paraguay, unless otherwise agreed with the client.