

PRIVACY POLICY

I. OBJETIVE: The meaning of this document is to comply with the rules concerning the processing of personal data, in order to show and release the policies and procedures that deal with proper treatment of personal data that **KADU** have been and will be collecting due to its social object, as well as and for handling complaints and claims of the holders of such data.

In the same way the aim is to regulate and to inform owners and authorities about the procedures under which the collection of personal data is base and the treatment given to them, with the final goal to ensure and protect the fundamental right of habeas data.

You agree to this policy once you start using our service. Notice that the same may be amended at any time by mere liberality of **KADU** by posting a revised version on our website. Later versions will have effect since the time of publication. If each new version contains a substantial change that may affect your rights, you will be informed with 30 days in advance by a posting notice of the change on the **KADU** website.

II. SCOPE: This document applies to the treatment of personal data that **KADU** collect, handle and store from officers, suppliers, contractors, users and any other person who provides their information, and shall be performed by all the areas that are responsible and in charge or are related with this information.

III. DEFINITIONS: For purposes of applying the contents of this document, it is important to understand the meanings of:

- a) Approval: Prior consent, express and informed by the Contractor to carry out the processing of personal data;
- b) Database: A organized group of personal data that is subject of Treatment;
- c) Personal Data: Any information that can be associated or linked to one or more specific or identifiable natural person;
- d) Data Processor: natural or legal, private or public person, which by itself or in association with others, perform the processing of personal data on behalf of the data controller;

- e) Responsible of the Treatment: natural or legal, private or public person, which by itself or in association with others, decides on the basis of data and/or processing of data;
- f) Holder: Natural person whose personal data are subject to treatment;
- g) Treatment: Any operation or set of operations on personal data, such as the collection, storage, use, circulation or deletion.
- h) Privacy Notice: verbal or written communication generated by the Responsible, addressed to the Holder for the treatment of their personal data by which you are informed about the existence of policies Treatment information to apply, establish the way to access to them and the aims of treatment that are going to be given to the personal data.

IV. PRINCIPLES: The principles set out below, are the general parameters that will be respected by **KADU**, when it comes to the treatment of personal data:

- a) Principle of legality on Data Processing: The Data processing is a regulated activity that must be subject to the provisions in it and the other provisions implementing;
- b) Principle of Purpose: Treatment must obey a lawful purpose in accordance with the law, which must be reported to the Contractor;
- c) Principle of Freedom: The treatment can only be exercised with the previous, express and informed consent of the Owner. Personal data may not be obtained or disclosed without authorization, or in the absence of legal or judicial mandate that relieve the consent;
- d) Principle of accuracy or quality: The information subject to treatment must be truthful, complete, accurate, current, verifiable and understandable. Treatment of partial, incomplete, split or misleading information is prohibited;
- e) Principle of transparency: In the treatment must be guaranteed the right of the Contractor to obtain the data controller or Data Processor at any time without restrictions, information about the existence of data relating to him must be given;
- f) Principle of restricted access and circulation: Treatment is subject to limitations arising from the nature of the personal data and the laws. In this

sense, the treatment can only be done by persons authorized by the Contractor and/or any person covered by the law.

- g) Principle of security: Information subject to treatment by the data controller or Data Processor will be handled with the technical, human and administrative measures necessary to provide security to records avoiding its alteration, loss, query, use or access unauthorized or fraudulent;
- h) Principle of Confidentiality: All persons involved in the processing of personal data that does not have the nature of public are obliged to ensure the confidentiality of information, even after the end of his relationship with one of the tasks comprising the treatment, they can only perform supply or communication of personal data when this is in the development of the activities authorized under the Act..

V. CONTENT

CHAPTER I. TREATMENT.

For the development of its corporate purpose, **KADU** store, collect, use and circulate personal data for:

- Knowledge of the consumer, that seeks to make payments through the platform offered;
- Identification of payments;
- Updating products and services;
- Promotion of new products and services;
- Updated and promotion of general information about **KADU** and its **CUSTOMERS**;
- Promotion of the services and customer support when they requested;
- Process transactions and send notices about your transactions;
- Collect fees, and resolve problems;
- Prevent potentially prohibited or illegal activities, and enforce our Terms of Service;
- Customize, measure and improve our services and the content and layout of our website;
- Compare information for accuracy and verify it with third parties.

CHAPTER II. COMPILATION

1. When you visit the website of **KADU** we collect your IP address and standard web log information, such as your browser type and the pages you accessed on our website.
2. If you open an account, we collect the following types of information from you:
 - Contact information - your name, address, telephone, email, instant messaging ID and other similar information.
 - Financial information - the full bank account numbers and credit card numbers that you link to your **KADU** account.
3. Before authorizing the use of our service, we may need you to provide us with additional information that we can use to verify your identity, address or manage risk, for example your date of birth, passport or any other information. We may also obtain information about you from third parties such as credit bureaus and identity verification services.
4. When you are using our service, we collect information about your account transactions and we may collect information about your computer or other access device for fraud prevention purposes.
5. Finally, we may collect additional information from or about you in other ways not specifically described here. For example, we may collect information related to your contact with our customer support team or store results when you respond to a survey.

CHAPTER III. AUTHORIZATION.

ARTICLE 1. AUTHORIZATION. The collection, storage, use, movement or deletion of personal data by **KADU** requires free, prior, express and informed consent by the holder. **KADU** as the responsible for the treatment of the personal data has provided the mechanisms needed for obtain the authorization from the holders, guaranteeing in all cases that it is possible to verify the granting of such authorization.

ARTICLE 2. METHOD AND MECHANISMS TO GRANT AUTHORIZATION. The authorization may be express in a physical, electronic, or any other document format that will guarantee a future reference in order to be possible to conclude an unequivocally acceptance by the holder of the information, approving the process of their personal data by **KADU**.

The request for authorization shall be issued by **KADU** and it will be available to the owner, prior to the processing of personal data, in order for him to know and make decisions about certain information that is going to be collected and used for certain purposes with the option of make any change on the data or control the use of your personal data.

The application for authorization shall contain:

- a) The treatment to which their personal data will be submitted and the purpose thereof;
- b) The optional nature of the response to the questions that will be made when they are relate to sensitive data or data from children and adolescents;
- c) The rights as Holder;
- d) Identification, physical or electronic addresses and telephone of the data controller.

ARTICLE 3. AUTHORIZATION TEST. **KADU** adopt essential measures to maintain appropriate records or technical or technological mechanisms about when and how he obtained authorization from the holders for the treatment of their personal data.

ARTICLE 4. PRIVACY NOTICE: The physical document, electronic or any other format, which is available for the holder to the processing of their personal data. Through this document the holder is informed about the existence of the political information treatment that must be apply and how to access to them, as well as the characteristics treatment that are going to be given to his personal data.

ARTICLE 5. MINIMUM CONTENT OF NOTICE OF PRIVACY. The privacy notice shall include at least:

1. Name or business name and contact details of the controller.
2. Treatments which will be rule the data and the purpose of it.
3. The rights afforded to the owner.
4. The mechanisms provided by the responsible in order for the owner to know the policy information and material changes that occur in it or in the Privacy

Notice. In all cases, it must inform to the owner how to consult or access to the treatment policy information.

Privacy Notice and the request for authorization may attend in a single act.

ARTICLE 6. NOTICE OF PRIVACY AND POLICY OF DATA PROCESSING. **KADU** it's going to keep the privacy notice model that aired to the holders during the processing of personal data and during the fulfilment of the obligations arising from it.

ARTICLE 7. AUTHORIZATION TO SHARE INFORMATION. When you use the services offered by **KADU**, you authorize us to share information provided under the following guidelines:

1. To process your payment we may need to share some of your personal information with the person or company to which you are paying. Your contact information , date of registration, the number of payments you have made to other **KADU** users and confirmations that you make transactions through **KADU**
2. If you are buying goods or services and you are going to pay through **KADU** platform, we can also provide the seller with the address to help complete your transaction with the seller. The seller is not allowed to use this information to market your services unless you have agreed. If there is an attempt to pay to the seller but later the pay is invalidated, we may also provide the seller details about failed payments.
3. We work with merchants to enable them to accept payments from you by using **KADU**. Thus, a merchant may share information about you with us, such as your e -mail address and other relevant information. We use this information to confirm that you are a customer of the merchant and the merchant uses **KADU** as payment platform. Also, if you request that we validate your status as **KADU** client with a third party, we will. Please note that from the merchants you buy usually have their own privacy policies, and **KADU** is not going to be held responsible for their operations, including but not limited to their information practices.
4. Also, **KADU** can share the information that you give us or that it acquired with companies that are part of **KADU GLOBAL**, to provide joint content and services (like registration, transactions and customer support) , to help detect and prevent potentially illegal acts and violations of our policies , and to guide decisions about their products, services and communications.

CHAPTER IV. DUTIES AND RIGHTS.

ARTICLE 8. OWNER RIGHTS. The holder of personal data have the following rights:

- a) To know, update and correct your personal data in front of the data controllers or processors. This right may be exercised, among others, against data that are partial, inaccurate, incomplete, split data, misleading, or whose treatment is prohibited or not authorized;
- b) Ask for proof of authorization to the data controller unless is expressly excepted;
- c) To be informed by the data controller or the processor, upon request, regarding the use that has been given to their personal data;
- d) To submit to the competent authorities complaints for violations of the provisions in the Act;
- e) Revoke the authorization and / or request removal of the data where it is found that the treatment principles, rights and legal and constitutional guarantees are not respected;
- f) Have free access to your personal data that have been object of treatment.

ARTICLE 9. DUTIES OF KADU IN RELATIONSHIP WITH THE TREATMENT OF THE PERSONAL DATA. KADU agrees to comply with the following duties:

- a) Ensure the Contractor, at any time, the full and effective exercise of the right of habeas data;
- b) To request and keep a copy of the relevant authorization granted by the Contractor;
- c) Inform the Contractor the purpose of the collection of data and the rights they have by virtue of the authority granted;
- d) Maintain the information on security conditions necessary to prevent tampering, loss, consultation, use, or unauthorized or fraudulent access;
- e) Ensure that the information supplied to the Data Processor is truthful, complete, accurate, current, verifiable and understandable;
- f) Update the information and communicate on time to the Data Processor, all the news regarding the data previously supplied to him and take other necessary steps to ensure that information supplied to it is kept current ;
- g) Correct the wrong information and communicate the changes to the Data Processor;

- h) Provide the Data Processor, as appropriate, only data whose treatment is previously authorized under the provisions of the Act;
- i) Require the Data Processor at all times, to respect the security and privacy of information of the Contractor;
- j) To deal with inquiries and complaints made under the terms stated in the Act;
- k) To adopt an internal manual of policies and procedures to ensure proper compliance with the Act and in particular for handling inquiries and complaints;
- l) Report to the Data Processor when certain information is being discussed by the Contractor, after the complaint was filed and the respective process has not ended;
- m) To inform when Contractors ask for it about the use made of their data;
- n) To inform the data protection authority when violations of safety codes are presented and in case of risks with the management of information given by the Holders.
- o) Comply with the instructions and requirements from the proper authorities.

CHAPTER V. ACCESS PROCEDURES, CLAIMS AND CONSULTATION

ARTICLE 10. ACCESS RIGHTS. KADU ensures that all holders of personal data that are given treatment, have access to it, and are going to be informed about all modifications, updates or deletions made from them.

KADU available to holders the following email privacy@kaducollect.com in order for them to write and have access to their personal information, to prove the treatment is giving to their personal information, to file claims or updating request, correction or deletion, and to request proof of authorization given by them in a determinate case.

KADU shall within 10 days extendable for 5 days, to respond to requests.

ARTICLE 11. CLAIMS. In accordance with the provisions of the law, the Contractor or his successors who consider that the information contained in a database should be subject to correction, update or delete, when they wish to withdraw authorization, or when they alleged failure to warn of any the duties under the Act, the owners may present a complaint in front the

data controller or Data Processor which will be processed under the following rules, to the mail address established in the previous article:

1. The claim shall be made by writing to the data controller or Treatment Manager and address to the mail above, with the identification of the Holder, the description of the facts that are object to the claim, address, and accompanying documents you want enforce. If the claim is incomplete, the person concerned will be required within five (5) days after receipt of the claim in order to remedy the flaws. After two (2) months from the date of application without the applicant submits the required information, is deemed to have abandoned the claim.

If the recipient of the claim is not competent to resolve, will transfer to the appropriate over a maximum term of two (2) business days and shall inform the person concerned of the situation.

2. Upon receipt of the complete claim it is going to be included into the database a legend that says "pending claim" and the reason thereof, within a period not exceeding two (2) business days. This legend shall be maintained until the claim is decided.
3. The maximum term to attend the claim shall be fifteen (15) business days from the day following the date of its receipt. When it is not possible to answer the demand in this term, the contractor shall be informed about the reasons for the delay and the date that the claim will be met, which in no case shall exceed eight (8) business days following the expiration of the first term.

ARTICLE 12. SUPPRESSION OF DATA. The holder has the right to request to **KADU** the removal of his personal data if consider that they are not being treated according to the principles set out in this document, the rights and duties, or if he considers that the cause for which treatment was authorized, has expired.

This suppression may be in accordance with the request of the holder full or partial. Nevertheless it should be noted that the application of suppressing information and revocation of authorization shall not proceed when the owner has a legal or contractual duty to remain in the database.

CHAPTER VI COOKIES

ARTICLE 13. "Cookies" are small data files that are on your computer and allow us to recognize you as a customer of the service offered by **KADÚ**, if you return to our site using the same computer and browser.

We use a series of "cookies" on **KADU** website, we can send a "session cookie" to your computer if you log in to your **KADU** account by enter your username and password. These cookies allow us to recognize if you visit multiple pages on our site during the same session, so you do not need to re-enter your password multiple times. Once you log out or close your browser, these session cookies expire and will have no effect.

We also use longer-lasting cookies for other purposes such as to display your e-mail address in the login form, so you do not need to retype the email address each time you log into your account.

We encode our cookies so that only we can interpret the information stored in them. You are free to decline our cookies if your browser allows you, but doing so may interfere with your use of our website. We may also collect information about your computer or other access device to mitigate risk and for fraud prevention.

Your Internet browser will allow you to disable cookies by modifying your browser settings. If you want to know how to do this, please use the help menu options of your browser. However, be aware that if you turn off the cookies this can severely restrict your use of the site of **KADU**.

FINAL PROVISIONS.

ARTICLE 14. KADU select the Compliance area or his substitute to fulfill the role of data protection to ensure their safety and acquiescence with this document in light of the provisions of the law.

ARTICLE 15. STATE OF BEING IN FORCE. This document is effective since its publication date.

