

**PRIVACY POLICY**  
**"PRIVACY STATEMENT FOR THE WEBSITE'S USERS".**

We, **INNOVACIÓN EN MEDIOS DE PAGO ELECTRÓNICOS, S.A.**, a company registered and in force in accordance with the laws of the Republic of Costa Rica, with corporate identification number three – one hundred and one – six hundred and fifty-seven thousand one hundred and seventy-nine (hereinafter and for all legal purposes referred to as "IMPESA"), will apply the protocols and measures defined in this Privacy Policy, in order to protect your privacy and the security of your Personal Data. Considering that you are a User of our Website, with access to information regarding the Services and functionalities offered therein, it is essential that you understand how we use, collect, and treat your information and what you can do to protect your privacy.

The User acknowledges that, by accessing and using the Website, he or she acknowledges and agrees to the terms and conditions of the Privacy Policy. The User further acknowledges and agrees that IMPESA reserves the right, at its sole discretion, to modify, substitute, amend or replace this Privacy Policy at any time, unilaterally, by posting a notice to that effect on the Website. IMPESA, at its sole discretion, may also notify the User through e-mail, telephone contact and any other means available and registered by the User in the different Services, functionalities, and platforms of IMPESA, if applicable.

**DEFINITIONS AND INTERPRETATION**

For purposes of this Privacy Policy, the following terms shall have the meanings set forth below:

- i. "Law 8968": means Law number 8968 of the Republic of Costa Rica, "Law for the Protection of the Individual against the Processing of Personal Data", of July 7, 2011, and its amendments, regulations and concordant.
- ii. "Personal Data": means all private information about the User that IMPESA collects by virtue of accessing and using the Website and the access to the information on the Services and functionalities offered therein. Such information refers to information received from the User in applications, contracts, forms, surveys, interactions between IMPESA and the User, among others. Information that is in the public domain and accessible to the public will not be considered Personal Data.
- iii. "Contact Functionality": means the functionality provided by IMPESA through its Website, whereby the User may contact IMPESA by text message, subject to the terms and conditions detailed herein.
- iv. "Services": means the information available through the Website about the different services and products offered by IMPESA, and the third-party links to access such products, being, for example, "Monibyte for Business", "Kipo" and "Monibyte App". The use and/or access to the products offered on IMPESA's Website are governed by the agreements and/or contractual obligations provided for this purpose in the product's login and/or download.
- v. "Website": set of pages and digital resources owned by IMPESA, which contains information, media, and links related to IMPESA's Services and functionalities, its social networks, and strategic and commercial alliances, accessible only through the "World Wide Web", at the following link: <https://www.impesa.net/>.

- vi. "Terms and Conditions": means the terms and conditions governing the relationship between IMPESA and the User regarding access to and use of the Website, which are accepted by the User upon accessing and/or using the Website and can be accessed at [REDACTED].
- vii. "User": means any natural or legal person who accesses and/or uses the Website, in accordance with the terms and conditions detailed herein and/or any other applicable documentation.

Terms importing the singular tense shall also include the plural tense and vice versa. Any reference to a group of persons shall be deemed to be a reference to all of them collectively, to some of them or to any of them individually. Words or terms importing the masculine, feminine or neuter gender shall also include all genders. The term "including", "includes", and other similar terms shall be deemed to be followed by the words "but not limited to".

Section headings and clauses are included in this Privacy Policy for ease of reference only and shall not be construed as limiting or affecting the interpretation of its provisions. Any references to articles, sections or clauses are made with respect to those set forth in this Privacy Policy, unless otherwise indicated.

### **WHAT INFORMATION DO WE COLLECT?**

IMPESA maintains in its database, Personal Data that the User provides through different means when accessing and/or using the Website, such as, but not limited to, filling out an online form (e.g., to obtain email updates, requests for additional information or the Contact Functionality), so we may collect Personal Data, such as, but not limited to, the following:

- Full name.
- Nationality.
- Personal and/or work telephone number.
- E-mail.

In addition, when the User contacts IMPESA (for example, through e-mail or the Contact Functionality), a record is kept of any communication that is maintained. In this regard, IMPESA may use the e-mail address and any other registered means to send information about its different Services and/or products detailed on the Website.

IMPESA collects information about the Website the User accesses and uses, and the way in which he or she uses them. The information obtained in this way includes the following:

- Collection of specific information of the device used, such as, but not limited to: hardware model, operating system version, date and time of requests, device name, device identification, among others.
- Information about how you access and use the Web Site using *cookies* (and other similar technology) as part of improving the content and functionality of the Web Site.
- Additional non-personal and identifiable information to monitor traffic patterns of visitors to the Web Site and specific pages, as well as site usage, to improve the design and presentation of content.

## **WHAT USE IS MADE OF THE INFORMATION?**

IMPESA may use, combine, and process the Users' Personal Data for the following purposes:

- To administer the information available about the Services and functionalities of the Website, as well as to attend any inquiry and information about them, including information about management, changes, improvements, new functionalities, new Services and products, individualized offer of Services and products, among others.
- To provide, maintain, protect, and improve the information available about the Services and functionalities offered on the Website, to develop others, and to protect the security of IMPESA and the User.
- To verify the identity of the User accessing or using the Website, as well as associated security parameters.
- To provide customer Service, as well as investigate and resolve complaints or disputes related to the information available about the Services and functionalities offered on the Website.
- To perform internal operations necessary for the availability of the information relative to the Services and functionalities offered on the Website, including troubleshooting software errors, operational, performing data analysis, research testing, monitoring, and analyzing usage and/or activity trends.
- To use non-personal and identifiable information to monitor traffic patterns of the Website's Users, and specific pages and profiles, to improve the design and presentation of content.
- To comply with its legal or regulatory obligations, as applicable, before the corresponding authorities.
- To send promotional materials, advertising, newsletters, updates, or announcements, and/or similars.

## **WHO WILL HAVE ACCESS TO YOUR PERSONAL DATA?**

Your Personal Data may be available to IMPESA or its affiliated, related, subsidiary and/or parent companies. We sometimes hire other companies, individuals and/or third parties to perform tasks for us, and they may require access to your Personal Data to carry out their functions. Notwithstanding the foregoing, such contractors, sub-contractors, suppliers, or third parties may not use the information for any other purpose and will have contractual confidentiality obligations. In addition to the foregoing, for the access and use of the Website and the information about the Services and products offered therein, the User expressly authorizes IMPESA to share and/or transfer his or her Personal Data and/or other information in accordance with the Terms and Conditions of the Website. Notwithstanding the foregoing, it is reiterated that no legitimate recipient of the Personal Data may use the information for any purpose other than those indicated in the corresponding documentation and shall have contractual confidentiality obligations if applicable.

IMPESA reserves the right to share, disclose, and/or release Personal Data to comply with its legal or regulatory obligations, in response to requests (mandatory or otherwise) by governmental or state agencies, or as part of the investigation of illegal activity.

IMPESA will request the User's consent prior to sharing or using his or her Personal Data for any purpose other than those set forth in this Privacy Policy, in the Terms and Conditions, and in any other documentation entered between IMPESA and the User.

If the User would like to update the information that he or she has consented to IMPESA's use, treatment and retention, he or she should contact [hello@impesa.net](mailto:hello@impesa.net), or through the Contact Functionality, and make the express request.

The User expressly acknowledge that if IMPESA (or any part thereof) is ever sold or transferred, the information in our possession may become part of the transferred assets but will also be used only for the purposes specified in this Privacy Policy.

### **INTERNATIONAL TRANSFER**

Your Personal Data may be transferred outside of your home country, including to countries or jurisdictions that do not provide the same level of data protection as your home country. Regardless of the country in which your Personal Data is located, it will be protected in accordance with our privacy and security policies as detailed below.

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

We have appropriate privacy and security policies in place to ensure, to the extent possible, the security and integrity of all our information, including your Personal Data, and to protect it from access, use, alteration, modification, distribution, or loss.

### **ACCESS AND CORRECTION**

We provide the User with ways to delete or update the information provided to IMPESA in case he or she considers it is not correct unless this information is required to be maintained for legitimate legal or business reasons. IMPESA will also remove or correct any information that it believes to be incorrect or inaccurate, without prejudice to any liability that the User may incur if the User has provided such incorrect or inaccurate information.

When you access or use the Website, we will protect your Personal Data from accidental or intentional deletion. For this reason, even if you delete your data from our Services and functionalities on the Website, we may not immediately destroy residual copies stored on our active servers or data stored in our security systems.

When processing your Personal Data, as a User of the Website, you have the right under applicable law and regulations to request access to your Personal Data and to correct inaccurate data. If, like you, we believe that the information is incorrect, or that its processing should be stopped, we will delete or correct it. If we do not believe it is incorrect, we will still record the fact that you believe the information is incorrect.

If you would like to access, correct, or delete the Personal Data we hold, you should contact [hello@impesa.net](mailto:hello@impesa.net), or through the Contact Functionality, and make the express request.

## **OPT-OUT OF RECEIVING FURTHER COMMUNICATIONS FROM US**

If you have chosen to receive information about the Services or functionalities offered on the Website and no longer wish to receive it, you can request not to receive further information by sending a message to the e-mail address [hello@impesa.net](mailto:hello@impesa.net) or through the Contact Functionality.

In this regard, you must clearly specify in the messages the following information: your name, username (if any), registration information (if any), the name of the Website, and any other information or data requested.

## **JURISDICTION AND APPLICABLE LAW**

The applicable law in case of dispute or conflict of interpretation of the term of this Privacy Policy, as well as any matter related to the Services of the Website, shall be that of the Republic of Costa Rica. The courts of San José, Costa Rica, shall have exclusive jurisdiction in any claim arising from or related to access or use of our Website, unless otherwise agreed by the parties. IMPESA retains the right to bring actions against you for violation of these terms and conditions in your country of residence or any other relevant country.

## **HOW TO CONTACT US?**

Any questions or concerns should be addressed in writing to [hello@impesa.net](mailto:hello@impesa.net) or through the Contact Functionality.

**Review period:**  (  ) months.

**Last revised:** June 2023.