

	Privacy Policy	CÓDIGO:PP
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		PÁGINA: 1 de 12

1. Introduction

About S1Gateway.

It is a customer service platform that improves the relationship between people and companies. It makes it easy to provide customer service through digital channels, since they can be integrated into a single platform, simplifying the chaos.

Application and Purpose of S1 Privacy Policy.

We are committed to respecting all applicable privacy laws and ensuring that your data is secure. This Privacy Policy ("S1 Privacy Policy") applies to all personal data processing performed by S1Gateway and aims to inform how S1 Gateway processes personal data (*including details of the type of personal data collected and the purpose of the processing*) and what are the user's rights on their personal data.

Modifications to S1 Privacy Policy.

This Privacy Policy can be modified at any time and with no prior notice, and it is operative since its publication on this site. The user should check back and stay informed periodically to make sure they are up-to-date with the changes.

Contact.

If you have any additional questions and/or would like to contact our Compliance Department, please email us at privacy@slot1.io.

2. Who is Responsible for the Data Processing?

Responsible for the Data Processing. The Responsible for the processing of your personal data is:

Company name: **Slotone S.R.L.**

Company address: 636 Hipólito Yrigoyen St – 5th floor Office A – Zip Code C1086AAJ – C.A.B.A., Argentina.

Data Controller. Likewise, S1Gateway has appointed Mr. Hernán Rossetto as data controller of the enforcement and control of this S1 Privacy Policy and the relationship with the enforcement authority, who can be contacted via:

Email: privacy@slot1.io

Telephone: +54 (9) 11 5171 4266

3. What personal data do we collect?

Personal information. The personal data that S1Gateway may collect include (i) names, surnames, addresses, telephones, emails, all the information that the user has provided and/or provides throughout the contractual or commercial relationship established; (ii) their own personal data related to the services provided by S1Gateway in the fulfillment of its obligations, whether due to the provision of customer care services, administrative services and other services in general (hereinafter and jointly referred to as the "Services"), (iii) technical information regarding access and/or use of the Services, as well as the date, time and duration of the access to the services, and (iv) any other data that is collected from time to time for the purpose of the provision of the Services, by operation of law, by command of a competent authority or through other sources that are permitted by law.

All personal information that identifies the user, revealed directly or by any means of contact and/or public online connection forum, may be collected and processed by S1Gateway.

Non-mandatory. As a general rule, when personal data is requested to use a service or access certain content, their transfer will not be mandatory, except in those cases where it is specifically indicated that it is data required for the provision of the Services, in which case the user may freely choose not to register and/or not to contract the Services.

Need. The user acknowledges that the data required by S1Gateway are necessary, adequate and not excessive to carry out the purposes expressed in this S1 Privacy Policy, which would be impossible to fulfill if said data is not provided.

Veracity. The data collection carried out by S1Gateway is in good faith and for this reason it presumes that they are true, correct, complete, and identify the owner who supplies and/or provides them, so it is the responsibility of the owner that the data provided to S1Gateway complies with such characteristics and are updated as required. The user declares and guarantees that all the data provided are true and correct, and agrees to keep them updated. Any false or inaccurate statement that occurs as a result of the information and data expressed as well as the damages that such information may cause will be the responsibility of the user and S1Gateway reserves the right to exercise the actions it deems appropriate in the event of false data.

4. What categories of data do we process and what is our legal basis?

Data Categories and Processing. We process information such as the following:

- Cookie ID,
- Device IDs (such as IP addresses),
- Personal data (name, surname, email, ID, among others)
- Demographic information such as age, gender, city/region, income, language.

If we receive information that could be used to determine the identity of users (for example, phone numbers, ID card numbers, email addresses), this information will be permanently encrypted or anonymized.

Every so often, and as long as applicable laws allow it, we process special categories of data such as inferences about people's ethnicity or non-sensitive medical conditions. In the European Union, European Economic Area and/or the United Kingdom, we do not process special categories of data and we do not create audiences from these categories of data.

We do not knowingly process data related to children under 18 years of age. If you are a parent or guardian and you believe that we may have processed data relating to a child for whom you are responsible, please see the sections below on managing legal rights and options.

Consent and Legal Basis. By providing personal data to S1Gateway, the user declares to accept their processing fully and unreservedly by S1Gateway. The user hereby grants its free, express and informed consent for S1Gateway to use the data collected for the purposes indicated in this S1 Privacy Policy, as well as its incorporation to a S1Gateway database.

When we are responsible for the data processing, consent will be our legal basis. When we apply the legal basis of legitimate interest, we will ensure that we take into account your expectations and rights and that our commercial interests do not prevail. When we are data processors, we will rely on the legal basis of our clients. Some of our data partners may rely on different legal bases, which must be explained before collecting your data.

S1Gateway processes the user's data legitimized in: (i) the contracting of the S1Gateway Services by the user, in accordance with the terms and conditions that are made available to the user once the service request form is completed (prior to a possible hiring) and that the user (after reading it), and if he agrees, can accept by checking the box that has been included for this purpose; and (ii) the free, informed and unequivocal consent of the user, made after reviewing this privacy policy where S1Gateway informs the data processing that will be carried out, and if you agree, you may check the box that has been included to that end on the service request form. The data processing that is not covered by any of the legal bases indicated above, will be carried out if S1Gateway considers it necessary to protect a legitimate interest and only if they do not contravene the fundamental rights and freedoms of the user.

It is clarified that, in accordance with the provisions of the applicable regulations, the user's consent will not be necessary to obtain personal data when:

- a) The requested data is obtained from sources of unrestricted public access.
- b) In the case of lists whose data is limited to name, national ID, tax or pension identification, occupation, date of birth and address; and/or

c) They derive from a contractual, scientific or professional relationship of the owner of the data, and are necessary for its development or fulfillment.

5. Where does the data come from?

S1 Gateway collects data directly from its partners' websites and applications using cookies, pixels, or similar data identification tools. These partners can be customers, advertisers, agencies, publishers and/or third-party data aggregators, website and application editors, among others. They can also come from our tools available to our data partners, which can come from any of the channels that our partners have enabled for this purpose and that are part of our set of solutions. We require all of our data partners to collect data only in accordance with applicable laws and to ensure that all users are given the appropriate information and options.

Furthermore, S1Gateway collects the personal data in its possession when the user:

- (i) completes the forms on our website;
- (ii) subscribes to the newsletter;
- (iii) responds to a survey or fills out a form, whether digital or printed; or
- (v) sends email or communicates by phone.

S1Gateway informs that the personal data collected is included in the specific automated files of users of S1Gateway Services and are stored in transactional databases made available according to the region of the data provided.

6. What do we use the data for?

The personal data collected by S1Gateway will be used for the following purposes:

- (i) In the case of contracting services offered through our website, to create and maintain the commercial relationship and to perform the activities and provide the services of S1Gateway (including unlimited management, administration, provision and improvement of the Services);
- (ii) Send newsletters, as well as commercial communications, promotions and/or advertisements from S1Gateway, either occasionally or periodically;
- (iii) Conduct a survey or administer a contest;
- (iv) Personalize the user experience, increasing our ability to respond to the user's needs;
- (v) Improve our website and the Services available, based on S1Gateway's legitimate interest in constantly improving its products and services;
- (vi) To process transactions and comply with the legal obligations to which S1Gateway is subject.

The data to be processed will not be used for purposes different from or incompatible with those mentioned above that motivated their acquisition. Notwithstanding the foregoing, it is stated that the registered data may also be used for the purpose of carrying out statistics, managing incidents or conducting market studies. The data processing will only be authorized if the original purpose is compatible with the new purpose or allowed in accordance with an independent legal basis. In these cases, the user will be informed of the changes in purpose or legal justification for the processing of their data.

We remind the user that they can oppose the sending of commercial communications (unsubscribe) and stop receiving emails from S1Gateway by reliably notifying S1Gateway, who will proceed to suspend it in the shortest possible time after receiving such communication. For this purpose, you may send an email

or postal mail to the addresses indicated in this S1 Privacy Policy or directly follow the unsubscribe instructions detailed at the end of each email from S1Gateway.

7. Confidentiality and Discretion. Are there other recipients of your data? Is your data conveyed or released internationally?

S1Gateway will keep the collected personal data confidential and preserved and will not use them for purposes other than those established in this S1 Privacy Policy. S1Gateway requires the signing of confidentiality agreements and personal data processing by its employees and third parties who provide services and/or access the content of the databases or include said obligations within the corresponding service agreements.

The user's personal data collected by S1Gateway will not be released, sold, exchanged, transmitted nor communicated to any third parties outside of S1Gateway without the consent of the user, except legal obligation and/or for the purpose of providing the Services to the user and/or to certain employees and service providers that allow S1Gateway to keep its website operational, to comply with the purposes established in this S1 Privacy Policy and/or to provide the Services to the user, who have assumed the obligation to maintain the confidentiality of the data provided and committed to compliance with the applicable regulations on the protection of personal data, at the time of contracting. The contracts with the service providers stipulate the object, scope, content, duration, nature and purpose of the data processing, the type of personal data, the categories of data holders and the obligations and responsibilities of S1Gateway and of the contracted third parties.

In particular, S1Gateway may share the personal information and personal data provided:

- (i) With our clients, who use our tool and who are the objective for which we are used as a means of direct contact with their agents or our agents specialized in solving our clients' problems;
- (ii) To other entities of our group of companies (currently located in Argentina, USA, Mexico, Brazil and Spain) that provide technical or support services, including controlling companies, affiliates, subsidiaries, related companies and/or intermediaries related to S1Gateway. In particular, when we send data from the European Union, the European Economic Area and/or the United Kingdom to other places, we implement safeguards designed to ensure that the data is processed in a manner equivalent to the rules applicable in the European Union. These may include various transfer mechanisms such as the standard contractual clauses approved by the European Commission for other transfers outside the European Union. A copy of these warranties may be available if we receive a valid request;
- (iii) Internally within S1Gateway, with certain departments such as administration, marketing or IT;
- (iv) in certain cases that are based on legitimate interest and on the economic and technical advantages associated with the use of specialized providers including unlimited social networks (which have their own privacy policies and terms and conditions, over which S1Gateway has no interference or control);
- (v) in the following cases: (a) if required by a judicial or administrative authority; (b) if necessary in order to exercise your rights under the terms and conditions of S1Gateway and/or under this

S1 Privacy Policy; (c) if necessary to comply with the law; (d) if said data could be useful for the protection of the rights of third parties; (e) when it is useful for the protection of the rights, property or security of S1Gateway, its controllers, subsidiaries, affiliates, directors, managers, employees, users or the general public; and / or (f) when there are well-founded reasons related to public safety, national defense or public health.

- (VI) Certain terms should be considered regarding the use of our YouTube-related features.

Therefore, by engaging our services, you acknowledge and agree that you are also subject to the [Youtube Terms of Service](#) and [Conditions of Use and privacy policies of the API client](#) (including the [Google Privacy Policy](#)).

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8. Security. How do we ensure data security?

S1Gateway declares its intention to adopt the necessary technical and organizational measures to guarantee the security, integrity and confidentiality of the data in line with the provisions of the applicable legislation, in order to avoid its adulteration, loss, consultation or unauthorized processing. In particular, all the credit data provided is transmitted via SSL (Secure Socket Layer) and encrypted in the database of the payment platform of the provider of these payment services. It is stated that credit data (credit card number, among others) are not stored on the servers of S1Gateway. In order to guarantee the confidentiality of the treatment, the payment service provider is contractually obliged to respect the confidentiality of the information.

The S1Gateway staff whose tasks are related to the processing of personal data are trained in order to guarantee better protection of personal data and the rights of its holders.

S1Gateway does not guarantee absolute privacy in the use of the website as the possibility that unauthorized third parties may have knowledge of it should not be ruled out. The user acknowledges that the existing technical means that provide security are not impregnable and that even when all reasonable security precautions are adopted, it is possible to suffer manipulation, destruction and/or loss of information. In the event that a security incident is detected and that it implies a significant risk for the owner of the data, such event will be communicated without delay to the competent control authority, together with the corrective and palliative measures implemented and/or to be implemented.

S1Gateway is not responsible for the loss or deletion of data by users. Likewise, S1Gateway does not accept any responsibility for possible damages caused by computer viruses.

Finally, the user must also take measures to protect their information. S1Gateway insists that you take every precaution to protect your personal information while on the Internet.

9. How long do we keep your data?

We keep the data for 12 months, except for the exception of a specific regulatory and/or contractual entity. Once our contractual obligations with clients are finished, the data is kept for a maximum of 30 days and then it is completely deleted or anonymized for statistical purposes.

10. Cookies

A cookie is a small piece of data sent from a website and stored in a user's web browser while the user is browsing that website. Every time the user loads the website, the browser sends cookie information to the server to notify the website that it recognizes the user.

We use persistent cookies that allow us to keep the sessions of our channels with users open and you can identify that session. Persistent cookies remain on your device for a long period of time.

You can delete or manage persistent cookies from your web browser by following the instructions provided in the “help” section of your web browser. Remember that some cookies are essential for using different functions of certain websites, so if you delete all cookies, those functions may not work as expected, or you may need to accept some cookies on your next visit.

To unsubscribe on mobile devices, review your system’s privacy controls. For more information visit: <https://www.networkadvertising.org/mobile-choice>

11. What are your rights?

The user who owns the data may at any time exercise the rights of access, rectification, cancellation, opposition, limitation of treatment, portability, confidentiality and deletion regarding their personal data, in accordance with the applicable legislation including, without limitation, the Regulation (EU) 2016/679 of the European Parliament and of the Council dated April 27, 2016 regarding the protection of natural persons with regard to the processing of personal data and the free circulation of these data (hereinafter, the “GDPR”), Argentine law No. 25326 on the protection of personal data, its regulatory decree 1558/01 and its complementary norms (the “Argentine PDPL”), the California Consumer Privacy Law (the “CCPA”) and the Lei Geral de Proteção de Dados Pessoais (“GLDP”).

The exercise of these rights can be carried out by the user himself through an email addressed to privacy@slot1.io, by written communication addressed to the Data Protection Officer or by any of the methods provided in the applicable regulations referenced above. The communication must be accompanied by a photocopy of the DNI, passport or other valid document that identifies the holder of the right, unless an identifying electronic signature is used, in which case the presentation of the identification documentation will be exempted.

The deletion of some data will not proceed when it could cause damage to the legitimate rights or interests of third parties, or when there is a legal obligation to keep the data.

Your rights under GDPR.

If you are in the European Union, European Economic Area and / or the United Kingdom, the GDPR lists the following rights: (i) the right to be informed; (ii) the right of access; (iii) the right to rectification; (iv) the right to delete; (v) the right to restrict processing; (vi) the right to data portability; (vii) the right to object; (viii) the right not to be subject to automated decision making. Concretely, this means that you have many rights in relation to the data that concern you, for example, to request access to it, to request the rectification of incorrect data, to request that it be erased (the “right to be forgotten”), to oppose its processing and / or requesting a copy to take it to another service provider (“data portability”), among others.

If our data processing is based on your consent, you can always withdraw this consent (*but any processing that took place before the withdrawal will remain legal*).

If you request that the data be erased, the usual method of doing this is to remove all personally identifiable elements so that the data is permanently anonymized and cannot be traced back to you.

In case of any problem, please contact us using the details in this S1 Privacy Policy and we will assist you as much as possible. If you believe that we have not respected your rights, you also have the right to file a claim with the Control Authority of your country (*for example, the Spanish Agency for Data Protection in Spain*).

Your rights under the Argentine PDPL.

The Argentine PDPL applies throughout the territory of the Argentine Republic and lists the following rights: (i) right of information, (ii) right of access, (iii) content of the information, (iv) right of rectification, updating or deletion, among others.

Your rights under the CCPA.

The CCPA is a privacy law implemented on January 1, 2020 in the State of California that defines personal information more broadly, ensures greater transparency, accountability, and provides consumers with extended rights regarding the collection and use of your personal information.

Your rights under the CCPA can be divided into the following categories: (1) right of notification, (2) right of access, (3) right to opt out (or right to participate), (4) right to request the elimination and (5) right to equal services and prices.

(i) Right of Notice: Under the CCPA, companies must inform consumers at the point of collection or in advance of the categories of personal information that will be collected and the purposes for which these categories will be used.

(ii) Right of access: consumers have the right to request that a company disclose the categories of personal information collected; the categories of sources from which personal information is collected; the commercial or business purpose; the categories of third parties with whom the company shares personal information; and the specific pieces of personal information that the company has about a consumer. If a company sells personal information or discloses it for commercial purposes, consumers have the right to request the categories of information that are sold or disclosed in this way.

(iii) Right to Opt-Out: Consumers have the right, at any time, to direct companies that sell personal information about the consumer to third parties to stop this sale, known as the right to opt-out. If a consumer is a minor, the CCPA establishes the right to opt for the sale of data (exercised by the minor if the consumer is between 13 and 16 years of age, or by the minor's parent or guardian if the consumer is a minor. old). 13 years). Businesses must wait at least 12 months before asking consumers to re-participate.

(iv) Right to request erasure: Consumers also have the right to request erasure of personal information, but only when that information was collected from the consumer. Like the right to erasure under the GDPR, this right is subject to exceptions. For example, companies do not need to delete personal information necessary to detect security incidents, exercise freedom of expression, protect or defend against legal claims or, in what is a potentially broad and likely contentious category, for internal uses reasonably aligned with consumer expectations.

(v) Right to services and equal prices: The CCPA prohibits companies from discriminating against consumers by denying goods or services, charging a different price or rate for goods or services, providing a different level or quality of goods or services, or suggesting they will do anything. of these things based on the exercise by the consumer of any right of the CCPA. In other words, consumers are entitled to equal prices and services.

Under the CCPA, you have the right to request specific pieces of personal information (as defined in the CCPA) that we hold about you, the business purpose for which the personal information was collected, categories of personal information, categories of the sources of which personal information was collected, the categories of personal information we shared, transferred or sold for a business purpose, the categories of third parties to whom the personal information was sold for a business purpose. If you wish to make such a request, you can write to privacy@slot1.io and we will respond to you within 45 days according to the law. We reserve the right to verify your identity if you make such a request.

However, we may not be able to respond to your request if it is against applicable law. *(Please note that we transfer personal information collected through our partner network to third parties and, as such, we are deemed to have disclosed or sold data (as defined in the CCPA) during the past twelve months).*

Your rights under the GLDP.

The GLDP applies to any resident or any company (located in Brazil or abroad) that collects and/or processes data from Brazilian residents. A data protection authority will soon be established that will offer guidance and guidance regarding compliance. S1Gateway collects data based on a valid legal basis, such as consent (consent) or legitimate interests (legitimate interests) according to article 7.1 of the GLDP.

Data subjects have the following rights under the GLDP: (i) confirmation of processing; (ii) access; (iii) correction; (iv) anonymization or deletion; (v) portability; (vi) elimination; (vii) information; (viii) revocation of consent; (ix) opposition; and (x) rectification.

Board of Directors
2021-08-19