

# MSLA International

## Privacy Notice

**Introduction.** MSLA International (“MSLA”) respects the privacy rights of all consumers and complies with the following privacy laws:

- The Regulation to the Federal Law on the Protection of Personal Data held by Private Parties
- The Privacy Notice Guidelines
- The Recommendations on Personal Data Security
- The Parameters for Self-Regulation regarding Personal Data
- The General Law for the Protection of Personal Data in Possession of Obligated Subjects
- Convention for the Protection of Individuals with regard to Automatic Processing of Personal Data
- Additional Protocol regarding supervisory authorities and trans-border data flows

**Privacy Notice.** This Privacy Notice describes our policies and practices concerning the collection, processing and transfer of Personal Data by MSLA.

**Definitions.** The term "Personal Data" includes information concerning a natural or legal person, such as name, address, age, phone, postal and electronic address.

**Types of Personal Data Collected:** MSLA collects, processes and transfers Personal Data such as: name, National ID Number, address, phone, email, gender, age, income bracket, credit card ownership. No sensitive data is collected or processed.

**Sources of Personal Data.** MSLA collect Personal Data from our data providers on each country in Latin America which sources are as follow:

- Publicly available data (e.g. government data)
- Agreements with professional associations
- Agreements with private associations
- Promotions and activations
- Surveys
- Census
- Subscription lists
- Lists of email opt-in consumers



**Purpose for the Collection, Processing and Transfer of Personal Data.** MSLA collects, processes and shares Personal Data with third parties for marketing purposes, identity verification and fraud prevention.

**Consent.** The consumer's implicit consent is necessary before Personal Data can be collected, processed and transferred to third parties. You should contact MSLA's Data Protection Officer if you wish to revoke your implicit consent to the collection, processing and sharing of your Personal Data,

**Choice.** MSLA give consumers the right to access, rectify, cancel and object ("ARCO" rights) to how their Personal Data is collected, processed or shared with third parties. If you do not want your Personal Data collected, processed or transferred to third parties, you should contact MSLA's Data Protection Officer to exercise your ARCO rights (email: [privacy@mslainternational.com](mailto:privacy@mslainternational.com))

**Access and Correction of Personal Data on MSLA's website.** Consumers who provide contact information or demographic data on MSLA's servers may access or correct their Personal Data by contacting MSLA's Data Protection Officer via email: [privacy@mslainternational.com](mailto:privacy@mslainternational.com)

**Retention Period.** In principle, users' personal data are deleted once their objective is met. However, some of the data mentioned below will be retained due to internal policies such as disputes, personal verification for a period of 30 days.

Data retained: full name, phone number, email, organization and country.

Rationale: Law on the use and protection of personal information for identification purposes.

**Cross Border Transfer of Personal Data.** MSLA may share your Personal Data with third parties such as data brokers and identity data verification and marketing companies outside of Latin America. Whenever MSLA transfers personal data to a destination outside Latin America, MSLA will take reasonable precautions pursuant to the Privacy Laws to protect the confidentiality and security of your Personal Data.

**Minors.** MSLA and its Affiliate will not knowingly collect Personal Data from individuals who are under eighteen years of age. If anyone has reason to believe that a minor has provided Personal Data to MSLA, please inform MSLA's Data Protection Officer so that the Personal Data may be deleted from our databases.

**Integrity and Information Security.** MSLA will exercise reasonable commercial measures to safeguard the reliability, accuracy and integrity of the Personal Data within our databases. We keep Personal Data for as long as reasonably required in accordance with the purposes for which it was



collected. Our servers and databases are protected by industry standard security technology, such as firewalls and password protection. Employees who have access to Personal Data have been trained to properly handle such information in accordance with our security protocols. While we cannot guarantee that MSLA's databases will never be breached, we strive to prevent such unfortunate occurrences. You may contact MSLA's Data Protection Officer if think your Personal Data may have been compromised.

**Changes to this Privacy Notice.** MSLA continuously improves and adds new functionality and features to its website. These continuous improvements, as well as changes in the laws and technology, require periodic updates to this Privacy Notice. You can access the current version of this Privacy Notice by clicking the button entitled Legal Information found in the top right corner of MSLA's website. The use of MSLA's website by any person or company constitutes acceptance of MSLA's data collection methods and processing practices.

**Questions About Our Privacy Notice.** If you have questions concerning this Privacy Notice or the ways MSLA processes your Personal Data, please contact MSLA's Data Protection Officer via email: [privacy@mslainternational.com](mailto:privacy@mslainternational.com)

This privacy notice was last revised Monday, February 8, 2024.