

MSLA ID

Privacy Notice

Introduction. MSLA ID ("MSLA") respects the privacy rights of all users and complies with the following privacy laws:

- General Data Protection Regulation (Regulation (EU) 2016/679).
- Argentina: Law on the Protection of Personal Data (Law No. 25326)
- Brazil: General Data Protection Law (LGPD – Law Nr.13709 (2018))
- Chile: Law on the Protection of Private Life (Law No.19628)
- Colombia: Statutory Law on Data Protection (Law No.1581 of 2012)
- Mexico: Federal Law on the Protection of Personal Data Held by Private Parties (LFPDPPP –2010)
- Peru: Personal Data Protection Law (Law No. 29733)

Privacy Notice. This Privacy Notice describes our policies and practices regarding the collection, processing, and transfer of personal data by MSLA.

Definitions. The term "Personal Data" includes information relating to a natural or legal person, such as name, address, age, telephone number, postal and email address.

Types of Personal Data Collected: MSLA collects, processes and transfers personal data such as: name, national identification number, address, telephone, email, gender, age, income level, credit card ownership. No sensitive data is collected or processed.

Sources of Personal Data. MSLA collects Personal Data from our data providers in each Latin American country, the sources of which are as follows:

- Publicly available data (e.g., government data)
- Agreements with professional associations
- Agreements with private associations
- Promotions & Activations
- Surveys
- Census
- Subscription Lists
- Email Subscription Consumer Lists

Purpose of collection, processing and transfer of personal data. MSLA collects, processes and shares personal data with third parties for identity verification and fraud prevention purposes.

The processing of personal data strictly necessary to provide the fraud prevention service constitutes a legitimate interest of the data controller in question, which is why our legal basis for data processing is the principle of legitimate interest, established in Regulation (EU) 2016/679 of 27 April 2016 (GDPR).

Rights of the Data Subject:

- Right to withdraw consent at any time.
- Right to access, rectify, portability and erasure of your data and to restrict or oppose its processing.

If you do not want your Personal Data to be collected, processed, or transferred to third parties, you should contact MSLA's Data Protection Officer to exercise your rights (email: privacy@msla-id.com)

Access and Correction of Personal Data on the MSLA 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@msla-id.com

Obligations as a Data Processor. In accordance with the fact that our legal basis for data processing is the principle of legitimate interest, for the transfer of information we receive from certain providers, we guarantee the following:

- To process the personal data transferred by the owner or responsible for the data, following at all times the guiding principles of personal data protection.
- That it will implement the required security conditions in accordance with the current legal framework; directing its resources and management towards effective compliance with the law, and implementing the administrative, legal, technical and specific security measures that are applicable to it, in accordance with the category of personal data processed under mandate, and its levels of risk.
- That the data will not be added to our own personal data banks, assuming at all times that the ownership of the personal data banks processed in the outsourcing belongs to the owner of the personal data bank.
- That it will announce the changes in its privacy policies or in the conditions of the service it

provides to the owner of the personal data bank, in order to obtain its express authorization if this means increasing its processing powers.

- That it will limit the type of processing of the personal data on which it provides the service to what is strictly necessary to fulfil the purposes.
- That the personal data on which the service is provided will be subject to confidentiality and professional secrecy.
- That it will prevent access to personal data to those who do not have access privileges.
- That it will transparently inform the owner of the personal data banks of the subcontracting carried out for the provision of services.
- That it will process personal data in such a way as to enable the exercise of the rights of its owner, developing a clear and simple procedure to respond to requests to exercise personal data protection rights.
- That in accordance with the mandate and procedure indicated by the owner of the personal data bank, the data will be destroyed, and/or suppressed and/or returned to the owner of the personal data bank, or access will be made impossible, after the provision of services that give rise to this is concluded.

Transfer of Information to Third Parties

As part of the processing carried out by MSLA, it may share the data collected through the providers that are the owners of the personal data bank, to their customers, and business partners. MSLA will only share personal data for commercial disclosure purposes and in accordance with the provisions of regulatory and data protection legislation related to the application of legitimate interest for the purpose of fraud prevention.

Recipients may process personal data in their capacity as data processor or controller. Where a recipient processes personal data on its own behalf as a data processor, the recipient is responsible for providing information about such processing of personal data. MSLA undertakes to implement appropriate technical and organisational security measures to ensure that the controller of personal data complies with security standards that are not lower than those of MSLA.

Category of third parties to whom the data license is granted. MSLA is authorized by legitimate providers in each country to legitimately license data for fraud prevention and related purposes only.

Retention Period. In principle, users' personal data is deleted once its purpose has been fulfilled. 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: Act 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 of Latin America, MSLA will take reasonable precautions in accordance with 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 under the age of eighteen. 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 can be removed from our databases.

Information Integrity and Security. MSLA will exercise commercially reasonable measures to safeguard the reliability, accuracy, and integrity of the Personal Data within our databases. We retain personal data for as long as reasonably necessary 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 databases will never be breached, we strive to prevent such unfortunate occurrences. You may contact MSLA's Data Protection Officer if you believe that 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 ongoing improvements, as well as changes in laws and technology, require regular updates to this Privacy Notice. You can access the current version of this Privacy Notice by clicking on the Legal Information button located in the upper right corner of the MSLA website. Use of the MSLA 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 about this Privacy Notice or about the ways in which MSLA processes your Personal Data, please contact MSLA's Data Protection Officer by email: privacy@msla-id.com

This privacy notice was last revised on Friday, February 28, 2025.