

3. Privacy Policy (Política de Privacidad)

This document extensively governs the complete life cycle of personal data within the organization. It adheres to the corporate cybersecurity guidelines of the Salvadoran regulator and sets out in detail the flows of information:

- **Integrated Privacy Glossary:** It technically defines the legal figures of the LPDP: the Controller (-----), the Database (the sets of encrypted physical and electronic media where the information is consolidated), Consent, Personal Data, and the Data Protection Officer (DPO) as the mandatory liaison for the management of requests and audits before the control authorities.
- **Categories of Personal Data Collected:**
 - o *Voluntary Registration Data:* The user's full name, official identification document number (DUI or Passport), date of birth, email address, and mobile phone number.
 - o *Transactional and Financial Data:* Information related to purchases, financial transactions on the integrated payment gateway, billing details, cryptographic token wallet addresses, blockchain timestamps, account balances, and deposit and withdrawal history.
 - o *Network and Connection Data:* Identification of the mobile carrier or internet service provider (ISP), preferred browser language, time zone, connection speed to the platform, and IP address.
 - o *Device Signals (Advanced):* EXCHANGE TECHNOLOGIES, S.A. DE C.V. automatically collects technical information about the hardware environment, such as Bluetooth signals and data from nearby Wi-Fi access points, beacons, or cellular telecommunication towers detected by its mobile applications in order to ensure session security.
- **Key Purposes of Processing:**
 - o *Account creation and authentication:* So that the user can access in a unified manner from any location or device.
 - o *Order processing and delivery:* To seamlessly execute the secondary-market commercial operations and notify their status.
 - o *Suitability assessment and fraud prevention:* Carrying out database cross-checks for strict KYC/AML controls.
 - o *Service analysis and optimization:* Technical monitoring of web-browsing flows on the portal for the development and refinement of the interfaces.
 - o *Commercial performance analysis:* Aggregated and irreversible processing of data for sales, financial performance, and supply chain reports intended for the board of directors and the corporate parent.

- o *Personalized Marketing Actions*: Sending newsletters ("Newsletters") or the "Insights" technical analysis service, designing profiles based on users' browsing preferences, applied solely through the prior express and revocable consent of the data subject.
- **Procedure to Exercise ARCO-POL Rights**: The policy describes the official channel for receiving requests and establishes the minimum admissibility requirements that the data subject must send in their email:
 1. Full name of the applicant.
 2. Type and number of their identification document.
 3. Contact telephone number and email address (the latter must match identically the email with which the user account was registered at Bitritm).
 4. Detailed and substantiated description of the privacy request or inquiry they wish to exercise.
- **Data Sharing and International Transfers**: The data is shared strictly with external providers that assist in the operation of the payment system. These partners are subject to severe contractual confidentiality limitations that prohibit the use of personal data for purposes unrelated to the authorized services. Likewise, the disclosure of personal information to judicial or law enforcement authorities is contemplated where a legal requirement or a court order issued by a competent authority, whether national or international, applies.