

Privacy and Personal Data treatment Policy

Updated and in effect since August 1st, 2021

WE ASSIST CORP. In compliance with current regulations on the protection of personal data, it informs you that the data you have provided us will be incorporated into a database whose owner and data controller is **WE ASSIST CORP.**

WE ASSIST CORP respects the privacy of users, subscribers and visitors of [www.weassistgroup.com] and any of its sites. The purpose of this Privacy Notice is to describe how **WE ASSIST** collects, uses and shares information about you through our online interfaces (eg, websites and mobile applications) owned and controlled by us. We ask that you read these privacy policies carefully to understand what we do and how we do it. This Privacy Policy also applies to the use of our Platform through a mobile device, whether through mobile applications or mobile-optimized websites.

For **WE ASSIST CORP** it is very important to take care of your personal information and we want you to be sure that your data is kept carefully and we also want you to know how we obtain it and how we use it. If you have any questions or want to contact **WE ASSIST CORP** for this reason, please contact legal@weassistgroup.com.

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1. GENERAL CONSIDERATIONS

- 1.1. Aware of the importance of the protection and proper handling of the personal information provided by the information holders, WE ASSIST CORP - hereinafter "WAC", who acts as responsible for the information received, has designed this policy and procedures that together they allow the appropriate use of your personal data.

- 1.2. In accordance with the provisions of the Political Constitution of the Republic of Panama, which recognizes the right to privacy, the inviolability of correspondence, the right of access to information, the fundamental right to habeas data, which empowers all citizens to know, update, rectify the personal data that exist about it in databases and in files of both public and private databases, which is unfailingly related to the handling and treatment of the information that the recipients of personal information must have in bill. These rights have been developed through the issuance of Law No. 6 of January 22, 2002 on Access to Information, and Law No. 81 of March 26, 2019 on Protection of Personal Data, based on which WAC As RESPONSIBLE for the personal data that receives, handles and treats the information and thus proceeds to issue this personal data treatment policy, which is made known to the public so that they know how WAC treats their information. The provisions of this personal data treatment policy are mandatory for WAC, its administrators, workers, contractors and third parties with whom WAC enters into relationships of any kind.



2. OBJECTIVE

- 2.1. With the implementation of this policy, it is intended to establish the criteria for the collection, storage, use, circulation and deletion of personal data processed by WAC. This policy seeks to guarantee the reservation of information and the security about the treatment that will be given to it to all users, clients, suppliers, employees and third parties from whom WAC has legally obtained information and personal data in accordance with the guidelines established by applicable law.

3. SCOPE AND INFO OF THE RESPONSIBLE FOR THE TREATMENT

- 3.1. This policy applies to all personal information registered in the databases of WAC, who acts as the person responsible for the processing of personal data.

- 3.2. Data of the person in charge of the processing of personal data:

Company Name: **WE ASSIST CORP.**

Address: Torre Financial Center, Floor 17, Suite A, Panama, Republic of Panama.

Email: legal@weassistgroup.com

Phone: +507 310-2588

Website: www.weassistgroup.com

- 3.3. The treatment may be carried out by WAC directly or through its contractors, consultants, advisors and / or third parties in charge of the processing of personal data, to carry out any operation or set of operations such as collection, storage, use, circulation, extraction , association, deletion, classification, transfer and transmission (the "Treatment") on all or part of your personal data

4. DEFINITIONS

- 4.1. The Privacy Policy and Treatment of Personal Data will be subject to the following definitions:

- a. Data storage. Conservation or custody in a database established in any intended medium, including Information and Communication Technologies (ICTs).
- b. Authorization: Prior, express and informed consent of the owner of the data to carry out the treatment. This can be written, verbal or through unequivocal behaviors that allow to reasonably conclude that the owner granted authorization.
- c. Notice of Privacy. Written communication to inform the holders of the information, the existence and ways of accessing the information treatment policies and the purpose of its collection and use.

- d. Database. An ordered set of data of any nature, whatever the form or modality of its creation, organization or storage, which allows the data to be related to each other, as well as to carry out any type of treatment or transmission of these by its custodian.
- e. Consent. Manifestation of the will of the owner of the data, through which the treatment of these is carried out.
- f. Personal Data. Any information linked or that may be associated with a specific person, that identifies or makes it identifiable.
- g. ARCO rights. Rights of access, rectification, cancellation and opposition.
- h. Deletion or cancellation of data. Delete or permanently erase the data stored in databases, whatever the procedure used for them.
- i. Responsible for the treatment of the data. Natural or legal person, who is responsible for decisions related to data processing and who determines the purposes, means and scope, as well as issues related to these.
- j. Headline. It is the natural person whose personal data is subject to treatment.
- k. Data transfer. Make known, disseminate, communicate, exchange and / or transmit, in any way and by any means, from one point to another, intra or extra-border, the data to natural or legal persons other than the owner, whether determined or indeterminate.
- l. Data treatment. Any operation or complex of technical operations or procedures, automated or not, that allows to collect, store, record, organize, elaborate, select, extract, confront, interconnect, associate, disassociate, communicate, assign, exchange, transfer, transmit or cancel data, or use it in any other way.

5. PRINCIPLES

5.1. The Privacy Policy and Treatment of Personal Data will be subject to the following principles:

- a. Principle of loyalty: personal data must be collected without deception or falsehood and without using fraudulent, unfair or illegal means.
- b. Principle of purpose: personal data must be collected for specific purposes and not be subsequently processed for incompatible or different purposes for which they were requested, nor be kept longer than necessary for the purposes of treatment.
- c. Proportionality principle: only the appropriate data should be requested. relevant and limited to the minimum necessary in relation to the purpose for which they are required.
- d. Principle of truthfulness and accuracy: personal data will be exact and updated so that they respond truthfully to the current situation of the owner of the data.
- e. Principle of data security: those responsible for the processing of personal data must adopt the necessary technical and organizational measures to guarantee the security of the data in their custody, mainly when it comes to data considered sensitive, and inform the owner, as soon as possible, when the data has been stolen without authorization or there are sufficient indications that its security has been violated.

- f. Principle of transparency: all information or communication to the owner of personal data regarding the treatment of these must be in simple and clear language, and keep him informed of all the rights that protect him as the owner of the data, as well as the possibility of exercising rights BOW.
- g. Principle of confidentiality: all persons involved in the processing of personal data are obliged to maintain secrecy or confidentiality regarding them, even when they have ended their relationship with the owner or data controller, preventing unauthorized access or use.

6. RIGHTS OF THE PERSONAL DATA HOLDER

- 6.1. The rights of the User as the Data Owner are those provided for in the Constitution and in Law No. 81 of March 26, 2019 on the protection of personal data, especially the following:
 - a. Right of access: allows the owner to obtain their data, in addition to knowing the origin and purpose for which they have been collected.
 - b. Right of rectification: allows the owner to request the correction of their personal data that are incorrect, irrelevant, incomplete, outdated, inaccurate, false or impertinent.
 - c. Right of cancellation: allows the owner to request the elimination of their incorrect, irrelevant, incomplete, outdated, inaccurate, false or impertinent personal data.
 - d. Right of opposition: allows the owner, for well-founded and legitimate reasons related to a particular situation, to refuse to provide his personal data or to be subject to a certain treatment, as well as to revoke his consent.
- 6.2. Upon request, WAC provides site visitors with access to all information (including proprietary information) it holds about them, including:
 - a. Information about the unique identifier (if applicable)
 - b. Information on transactions (e.g. the dates customers made purchases, quantities and types of purchases)
 - c. Communications that the Owner has directed to our site (for example, emails, customer inquiries)
 - d. Contact information (for example, name, address, phone number)
- 6.3. Upon request, WAC offers the Holder the possibility of correcting errors in said information. In order to correct this information, the Holder can write to WAC at the address indicated above.
- 6.4. Should WAC's information practices change at any time in the future, WAC will notify users of the changes through its website. The user will have the opportunity not to accept these new uses. In case of being concerned about the way in which their information is used, the user should check the WAC website frequently. We will keep your personally identifiable information for the time necessary for which your personally identifiable information was collected and processed.

7. DUTIES OF THE DATA CONTROLLER

- 7.1. The following are the duties of the Person Responsible for the Processing of Personal Data:
- a. Request and keep, under the conditions set forth in this law, a copy of the respective authorization granted by the owner.
 - b. Properly inform the owner about the purpose of the collection and the rights that assist him by virtue of the authorization granted.
 - c. Keep the information under the necessary security conditions to prevent its adulteration, loss, consultation, use or unauthorized or fraudulent access.
 - d. Process the queries and claims formulated in the terms indicated.
 - e. Inform at the request of the Owner about the use given to their data.
 - f. Inform the data protection authority when there are violations of the security codes and there are risks in the administration of the information of the holders.
 - g. Comply with the instructions and requirements issued by the superintendency of industry and commerce.

8. TREATMENT AND PURPOSES

- 8.1. WAC informs the owners that the data collected from our clients, contractors and suppliers may be used for the following purposes:
- a. The support of the contractual relationship established with WAC
 - b. To create and / or manage your user accounts
 - c. Carrying out all activities related to the services or products offered by WAC, its partners, and / or affiliates. And in general, to comply with the obligations contracted by WAC with its clients when acquiring our services and products
 - d. To carry out the sale of products, courier services, product delivery
 - e. Use the Personally Identifiable Information that we collect to verify your identity and to authenticate that you and / or your company are real natural or legal persons
 - f. Carry out satisfaction surveys regarding the goods and services offered by WAC
 - g. Send information about changes in the conditions of the services and products purchased, and notify you about new services or products
 - h. Manage your requests, clarifications, and investigations
 - i. Prepare studies and programs that are necessary to determine consumption habits
 - j. The fine-tuning of security filters and business rules in commercial transactions; confirm, process such transactions, with your financial institution, with our service providers and with yourself
 - k. Carry out periodic evaluations of our products and services in order to improve their quality
 - l. The sending, by traditional and electronic means, of technical, operational and commercial information on products and services offered by WAC, its associates or suppliers, currently and in the future

- m. Provide contact information to the sales force and / or distribution network, telemarketing, market research and any third party with which WAC has a contractual relationship for the development of activities of this type (market research and telemarketing, etc.) for the execution of the same
 - n. Carry out the transmission and / or transfer of data to other companies, commercial alliances or third parties in order to fulfill the obligations acquired. The transmission and transfer may even be made to third countries that may have a different level of protection compared to the national one, when it is necessary for the fulfillment of our obligations
 - o. Respond to queries, requests, complaints and claims that are made by controlling bodies and other authorities that by virtue of the applicable law must receive personal data
 - p. Contact the Owner through telephone means to carry out surveys, studies and / or confirmation of personal data necessary for the execution of a commercial relationship
 - q. Conduct research or statistical analysis in order to improve the content and design of the platform and to improve the product and service offerings on the Sites, including, for example, using anonymous data for machine learning purposes
 - r. Transfer personal data in order to comply with regulations related to the prevention of fraud or crimes related to money laundering
 - s. Any other activity of a similar nature to those described above that is necessary to develop the corporate purpose of WAC.
- 8.2. The processing of personal data will be carried out with the prior authorization of the owner of the data, except in events in which the data is of a public nature. WAC employs all activities aimed at preserving the confidentiality of the information.
- 8.3. The authorization will be obtained through any means that can be subject to subsequent consultation, such as the website, forms, formats, face-to-face activities or through social networks, etc. The authorization may also be obtained from the unequivocal conduct of the data owner that makes it possible to reasonably conclude that he granted authorization for the processing of your information.
- 8.4. If you provide us with personal information about a person other than yourself, such as your spouse or a co-worker, we understand that you have the authorization of that person to provide us with your data; and we do not verify, nor do we assume the obligation to verify the identity of the user / client, nor the veracity, validity, sufficient and authenticity of the data of each of them, provide. By virtue of the foregoing, we do not assume responsibility for damages or prejudices of any nature that could originate in the lack of veracity, homonymy or the impersonation of identity information.
- 8.5. Certain services or products provided on the www.weassistgroup.com page, and on any of the portals of the WAC Business Group companies and their equivalents, may contain particular conditions with specific provisions regarding the protection of Personal Data.
- 8.6. The Personal Data collected will be subject to manual or automated treatment and incorporated into the corresponding files or databases of WAC, either as the person in charge of the treatment and the person responsible for the protection of the data. To determine the term of the treatment, the rules applicable to each purpose and the administrative, accounting, fiscal, legal and historical aspects of the information will be considered.

- 8.7. When at the time of providing the service, the owner is accompanied by minors or people considered to be disabled, and in which the collection of their personal data occurs, WAC will always request the authorization of whoever has the legal representation of the minor. Now, if personal information of the population mentioned here is delivered without being the legal representative, you state that you have the authorization of the respective legal representative, directly assuming the responsibility that this entails. WAC will strive to ensure that their rights, and their superior and prevailing interest, are respected at all times. The representative must guarantee the right to be heard and assess their opinion of the treatment taking into account the maturity, autonomy and capacity of minors. The representatives are informed of the optional nature of answering questions about the data of minors. The data of minors, included in a special category of protection, will be treated in accordance with the applicable legislation on the matter and in accordance with the provisions of our personal data policy.
- 8.8. If you choose to delete your information, to the extent permitted by law, we will keep certain personal information in our files in order to identify accounting and tax data of transactions carried out, prevent fraud, resolve disputes, investigate conflicts or incidents. , enforce our terms and conditions of use and comply with legal requirements.
- 8.9. However, at the time you decide to revoke your authorization, the information hosted will not be used for the purposes set forth herein, only in the terms strictly necessary and defined in the previous paragraph.
- 8.10. Security Risks that you should be aware of when conducting transactions on the Internet:
 - a. It can be presented that a user is deceived by means of emails or some DNS server deception, to visit a false site that presents the same design, but where the card data is loaded into the false system, stealing cardholder information. For this reason, it is important to generate the culture that users must enter directly through known domains to reduce risks in order to carry out transactions
 - b. It can be presented that the computer where the user is carrying out the transaction, has installed without prior knowledge, some spyware or malicious software that captures everything typed by the keyboard or captures information from input devices and is sent to a network or host in Internet. Therefore, it is recommended as far as possible that the transaction be carried out on the home or office computer
 - c. Impersonation of the owner could occur that the owner denies having sent and / or received the transaction and is used by a third party
 - d. It is recommended that from the computer where you carry out electronic transactions, you have an updated and active antivirus to mitigate the risks of fraud.

9. WHAT PERSONAL INFORMATION DO WE COLLECT?

9.1. The information and / or personal data that we collect from the Owner are the following:

- a. **Type of person: Natural:** names and surnames, type of identification, identification number, gender, marital status and date of birth, email, financial data (bank accounts); Legal: company name, TIN, address, telephone, cell phone, email, country, city, financial data (bank accounts).
- b. **Information necessary to facilitate the purchase of WAC products and services** (e.g. customer identification, names, surnames, identification number, address, telephone numbers, city, email, details of the products, type of request, date of request, shopping preferences, payment information, among others.)
WAC may also request that you provide details or preferences about the goods and products that you may be interested in purchasing through the Platform from time to time and any relevant details or preferences for your purchases.
- c. **Cardholder data:** type of document, document number, telephone, address, email, names, card number, expiration date and bank. In connection with the facilitation of transactions, purchases and payments through the Platform, you will be asked to provide certain payment information. This may include bank account numbers, payment vouchers, billing and delivery information, credit / debit card numbers, expiration dates and security code, and check or money order tracking information to facilitate selling and purchasing, as well such as the settlement of the purchase price of the products or services, processed or acquired through the Platform
- d. **Quote request:** names, surnames, telephone numbers, city and email.
- e. **Information for surveys:** names, surnames, email, telephone numbers, city, opinions and comments.
- f. **Evaluate our site:** your opinion is very important for us to continuously improve our service channels: names, surnames, email, telephone numbers and city.
- g. **Claim request:** names, surnames, identification number, address, telephone numbers, city, email and comments. Information relevant to the disputes or claims presented. This may include Health data of the Holder, information of the products purchased on the Sites to the extent relevant to disputes or claims.
- h. **Report of technical problems:** names, surnames, address, telephone numbers, city, email and comments.
- i. **Biometric data:** images, video, audio, fingerprints that identify or make identifiable our clients, users or any person who enters or is or transits anywhere that WAC has implemented devices to capture said information.

9.2. These data can be stored and / or processed on servers located in the data processing center, whether owned or contracted with providers, located in different countries, which is authorized by our clients / users, by accepting this treatment and protection policy. of personal data.



- 9.3. WAC reserves the right to improve, update, modify, delete any type of information, content, domain or subdomain, which may appear on the website and the Sites, without any obligation of prior notice, understanding as sufficient with the publication in the WAC websites. For the solution of legal or internal requests and for the provision or offer of new services or products.

10. WHAT INFORMATION DO WE COLLECT AUTOMATICALLY?

- 10.1. WAC and its sites automatically collect information as follows:
- a. If you contact us (for example, through our customer service chat service, telephone or email), we may record a copy of your correspondence and request additional information to verify your identity.
 - b. We will collect contact details and other information about users from publicly available sources in order to verify users and perform due diligence on users.
 - c. We will collect details of the activities, transactions and interactions of users on the Platform, including information related to the types and specifications of products and services purchased, pricing and delivery information, records of disputes and complaints, communications between users and any information. disclosed in any discussion forum.
 - d. We may also collect information about existing and potential users, during or in connection with promotions, marketing events in alliance with other brands, industry events and / or other functions; including representative contact names, addresses, telephone numbers, and email addresses.
 - e. and. If you visit our Platform, we will automatically collect certain information from your device. In some countries, including countries in the European Economic Area, this information may be considered personal information under applicable data protection laws. Specifically, this information may include IP addresses, device type, unique device identification numbers, browser type, broad geographic location (for example, location at the country or city level), browsing patterns, and details of how you have interacted with our Platform and the goods and services available on it. In addition, we collect statistical information about the Platform, its use and performance, and visitors to the Platform, including browser software, operating system, software and hardware attributes, pages visited, number of sessions, and unique visitors. Collecting this information allows us to better understand the visitors who come to our Platform, where they come from and what content they are interested in. We use this information for our internal analysis purposes and to improve the quality and relevance of our Platform. Some of this information may be collected using cookies and similar tracking technology.

11. COOKIES

- 11.1. Like other websites, WAC uses certain technologies, such as cookies, and device fingerprinting, that allow us to make your visit to our site easier and more efficient, providing you with a personalized service and recognizing you when you return to our site.

- 11.2. Cookies are pieces of information that are stored directly on the computer that the user is using. Cookies allow the company to recognize your computer and collect information such as browser type, time spent on the Site, pages visited and language preferences. The company may use the information for security purposes, to facilitate navigation, to display information more effectively, to personalize your experience while visiting the Site, or to collect statistical information on the use of the Site.
- 11.3. We use our own and third-party cookies for various reasons. Some cookies are necessary for technical and / or security reasons for our Platform to function, and we refer to them as "essential" or "strictly necessary" cookies. First-party cookies are mainly used to enable basic functionality on our Platform; including web analytics cookies that help us understand how users use our web pages and how we can improve their use. For example, we use essential or strictly necessary cookies to enable us to remember products added to your shopping cart on the Sites.
- 11.4. In addition, we also use "marketing" cookies for social networks and various search engines. You can register to be a user, client of the Platform and "share" the content of the Platform through social networks such as Facebook and Twitter. They are also used to precisely measure the effectiveness of our online marketplace promotions and conversion rates. Sometimes we embed videos from websites like YouTube. These websites have their own privacy policies governing their use of information, which you can find on the respective websites.
- 11.5. We also use "statistical" cookies to enable us to track and target the interests of visitors to the Platform to improve the experience on our Platform by investigating visit patterns and conducting interest-based advertising; help our partners and / or affiliated businesses to track user visits to the Platforms; and to track progress and participation in promotions. We use our own and third-party cookies for these purposes.
- 11.6. For the purposes of this document, "cookies" will be identified as the text files of information that a website transfers to the hard drive of the users' computer in order to store certain records and preferences.
 - a. Websites may allow advertising or third-party functions that send "cookies" to the computers of the owners.
 - b. Cookies are only associated with an anonymous user and their computer, and do not provide their name and surname. In many cases, you will be able to browse any of the WAC websites anonymously. When you access any WAC website, your IP address (the Internet address of your computer) is recorded, to give us an idea of which parts of the website you visit and how much time you spend in each section. We do not link your IP address to any of your personal information, unless you have registered with us and entered the system using your profile. For this reason, it is possible that in certain applications WAC recognizes users after they have registered for the first time, without having to register at each visit to access the areas and services or products reserved exclusively for them.
 - c. In other services, it will be necessary to use certain access codes, and even the use of a digital certificate, in the characteristics that are determined.
 - d. The cookies used cannot read the cookie files created by other providers. WAC encrypts the user's identifying data for greater security.
 - e. To use the WAC website, it is not necessary for the user to allow the installation of the cookies sent by WAC, without prejudice to the fact that in this case it will be necessary for the user to register for each of the services whose provision requires prior registration.

- f. Websites can allow advertising or third-party functions that send "cookies" to the computers of the holders.
 - g. Cookies are only associated with an anonymous user and their computer, and do not provide their name and surname. In many cases, you will be able to browse any of the WAC websites anonymously. When you access any WAC website, your IP address (the Internet address of your computer) is recorded, to give us an idea of which parts of the website you visit and how much time you spend in each section. We do not link your IP address to any of your personal information, unless you have registered with us and entered the system using your profile.
 - h. For this reason, it is possible that in certain applications WAC recognizes users after they have registered for the first time, without having to register at each visit to access the areas and services or products reserved exclusively for them.
 - i. In other services, it will be necessary to use certain access codes, and even the use of a digital certificate, in the characteristics that are determined.
 - j. The cookies used cannot read the cookie files created by other providers. WAC encrypts the user's identifying data for greater security.
 - k. To use the WAC website, it is not necessary for the user to allow the installation of the cookies sent by WAC, without prejudice to the fact that in this case it will be necessary for the user to register for each of the services whose provision requires prior registration. .
- 11.7. By using and browsing the WAC sites, you are consenting to the use of the cookies set out above in the conditions contained in section 11. "Cookies" in this privacy policy. We make the exception that cookies are not necessary for the use of our platform, you will have at all times the option to block or disable them in your browser settings. However, if you decide to deactivate or block them and continue using our platform, you can do so, but some of their services may be limited, affecting your experience on our platform.

To renounce to your informed consent regarding our cookie policy, you must enter your device's browser through the configuration of your internet browsers. Here are some of the links from the different browsers that report on cookies:

Firefox: <https://www.mozilla.org/es-ES/privacy/websites/>

Chrome: <http://support.google.com/chrome/bin/answer.py?hl=es&answer=95647>

Explorer: <http://windows.microsoft.com/es-es/windows7/how-to-manage-cookies-in-internet-explorer-9>

Safari: <http://support.apple.com/kb/ph5042>

Opera: <http://help.opera.com/Windows/11.50/es-ES/cookies.html>

12. WHAT INFORMATION DO WE RECEIVE FROM THIRD PARTIES?

- 12.1 We may receive personal information about you from social media platforms if you decide to register for the WAC platform using a social media account. The exact information that we will receive will depend on the



privacy settings applied or applicable on the social media platform, but typically include basic information from your profile such as: your name, profile picture, country, company name, contact information.

- 12.2 We may also receive personal information about you from third parties that is integrated with us to assist us with verification services and conduct of anti-money laundering policies and Know Your Customer in the review of our users, and to improve our marketing efforts. This can include information such as your name, email, company details, and contact information for company representatives.

13. DISCLOSURE OR DISCLOSURE OF PERSONAL INFORMATION

- 13.1. We may disclose (or provide access to) personal information to the following categories of recipients:
- a. Other users of the platform when necessary in relation to the facilitation of purchases and communications made between you and the other users.
 - b. b. Third party business partners, service providers and / or affiliates of WAC contracted by us or who work with us to help us provide services to you or otherwise process personal information for the purposes described in this Privacy and Data Processing Policy or that We notify you when we collect your personal information. The categories of these partners or service providers include:
 - Partners or vendors of WAC and their respective affiliates and / or their designated service providers who work with us to provide processing services such as software, tools, systems, and messaging services for the purposes described in this Privacy Policy;
 - our business partners (affiliated merchants), for example, so they can provide you with discounts or offers that may be of interest to you;
 - marketing and advertising platforms, such as Google, Twitter, Facebook and Instagram, and providers of analysis services related to user behavior, to adapt the content you see when you visit our Platform. These platforms may combine the information they collect on our Platform with data from their platforms and the data they collect from other websites or other sources to conduct targeted advertising. The processing activities of these third-party marketing platforms are governed by their own privacy policies, not by this Privacy Policy;
 - payment service providers that collect and process personal information to help settle payments for transactions or process withdrawal requests from sellers. The activities of payment service providers may be governed by their own privacy policies, not by this Privacy Policy;
 - logistics partners to provide delivery services for Buyers, including product return and exchange, and warehousing services for Sellers (of WAC providing the service);
 - cloud computing service providers to provide cloud storage services;
 - customer service providers to provide after-sales services;
 - risk control service providers to assess the security of user accounts and transaction risks; and
 - third party rating / review service providers to conduct reviews of our services with customers if you choose to participate in the review or rating of WAC products and / or services;



- c. To our professional advisors, law enforcement agencies, insurers, government and regulatory organizations and other organizations where we believe it is necessary to comply with applicable laws or exercise, establish or defend our legal rights or protect your vital interests or the of any other person, we may also disclose and transfer your personal information or as required or permitted by applicable law.
- d. To any other person with your consent for the disclosure.
- e. We may provide aggregated or anonymous data to third parties, but when we do so, the information we share is in an anonymous format that does not personally identify you.

14. NATIONAL AND INTERNATIONAL PERSONAL DATA TRANSFER

- 14.1. WAC may transfer data to other Data Controllers when authorized by the owner of the information or by law or by an administrative or judicial mandate.

15. INTERNATIONAL AND NATIONAL TRANSMISSION OF DATA TO MANAGERS

- 15.1. WAC may send or transmit data to one or more managers located inside or outside the Republic of Panama in the following cases: a) When it has authorization from the owner and b) when without authorization there is a contract between the Responsible and the person in charge data transmission.

16. CONFIDENTIALITY AND SECURITY OF THE SITE AND YOUR PERSONAL IDENTIFICATION INFORMATION

- 16.1 WAC uses industry standard SSL encryption technologies when transferring and receiving confidential information (eg, credit card details and personal information). The pages on which this information is exchanged are located on a secure server.
- 16.2 Payment processes are processed by a service from a third-party provider with PCI-DSS Compliant certification.
- 16.3 Several of the assistance plans that WE ASSIST offers have an online enrollment and / or subscription option. The company understands user concerns about Internet security and works closely with its developers to keep the forms in a highly secure ordering environment so that the user can sign up for the company's services with confidence.
- 16.4 When the user is ready to enroll in one of the company's services, it will move to a secure area of the site. Once logged in, the beginning of the page address (URL) will change from http to https, to indicate that the user is in a secure area. An icon with a closed key or padlock will also appear in the lower right corner of most browsers to indicate this change. The user will remain in this safe area throughout the purchase process.



- 16.5 WAC considers the confidentiality and security of your information and the use of its site of the highest importance. For this reason, WAC will take the corresponding technical, physical, legal and organizational measures, which will be consistent with the applicable privacy and data security laws. Unfortunately, it is not possible to guarantee that any data transmission over the Internet or a data storage system is 100% secure. If the user has reason to believe that their interaction with the company is no longer secure (for example, if they consider that the security of any Personally Identifiable Information that the company may have has been threatened), it is their responsibility to notify immediately the company.

17. INTERNATIONAL PRIVACY PRACTICE

- 17.1 The WAC Sites are primarily operated and managed on servers located and operated within the United States. In order to provide you with our products and services, we may send and store your personally identifiable information outside of the country where you reside or are located, including to the United States. Consequently, if you reside in or are outside of Panama, your personally identifiable information may be transferred outside of the country where you reside or are located, even to countries that may or may not provide the same level of protection for your information.
- 17.2 WAC is committed to protecting the privacy and confidentiality of personally identifiable information when it is transferred, using the best practices available to it; however, no data transmission over the internet or over a wireless network can be guaranteed as "perfectly secure". As a result, although we try to protect the information we maintain about you, we cannot guarantee the security of any information that you transmit to us and you do this at your own risk.

18. THIRD PARTY LINKS

- 18.1. For your convenience, we may provide you with links to websites operated by other non-WAC organizations (Third Party Sites), which, based on information provided and analyzed by our site, is of interest to you. We share your personally identifiable information with these third party sites unless we have a legal basis that allows us to do so. We do not endorse and are not responsible for the privacy policies and practices of these third party sites. If you wish to access any of these third-party sites, we recommend that you always carefully read the privacy policies and any other informative document on the site's practices before using their services and sharing your personal information.



19. CLAIMS, QUESTIONS AND SUGGESTIONS

- 19.1. If you have any claim, question or suggestion about the process of collection, treatment or transfer of your personal information, or consider that the information contained in a database should be subject to correction, update or deletion, please send us a message to the following email account: info@weassistgroup.com

20. VALIDITY

- 20.1. WAC reserves the right to modify this policy to adapt it to new legislation or jurisprudence, as well as good practices in the economic sector that are part of the business group. In such cases, WAC will announce on this page the changes introduced with reasonable anticipation of their implementation. This policy was modified and posted on the WAC websites on August 1, 2021 and is effective as of the date of posting.