



## **PRIVACY POLICY**

**SECTION 1:** Qwetrust Unique, Qwetrust, Turnos Unique, TurnosPR and Turnos Media, LLC Privacy Policy. When we use the name Qwetrust Unique or Qwetrust in this policy, it also means including Qwetrust, Qwetrust Unique, TurnosPR, Turnos Unique and Turnos Media, LLC.

### **SECTION 2: INTRODUCTION**

This privacy policy (“Privacy Policy”) describes how information and data is collected from you when you use this online website, application, digital service, and how Qwetrust Unique uses, shares and manages your information and data. By using any of our services, you consent to the collection, use, processing, and sharing of your information as described in this Privacy Policy.

### **SECTION 3: GENERAL INFORMATION ABOUT THE PRIVACY POLICY**

Qwetrust Unique is committed to respecting your privacy rights by keeping you informed and processing and protecting your personal data in compliance with applicable law.

Effective May 25th, 2018, if you are from the European Economic Area (“EEA”) our processing of your personal data will comply with the Regulations (EU) 2016/679 of the European Parliament and the Council of 27 April 2016, known as the General Data Protection Regulation. (GDPR).

Our Privacy Policy applies to those persons or entities who obtain from us services to be used for business purposes.

Our goal is to respond to your inquiries, to provide better customer service, and to provide products, services, and other promotional information we believe may help meet your needs or be of interest to you. This Privacy Policy explains:

- The types of information we may collect about you
- The types of information we may disclose to third parties
- The types of third parties to whom we may disclose information
- How we protect the non-public personal information we collect about you
- How you may instruct us not to disclose certain information about you which we are not otherwise permitted to disclose by law

#### **SECTION 4: CATEGORIES OF INFORMATION WE COLLECT**

We may collect non-public personal information about you from the following sources:

- Information we receive from you on applications or other forms, such as such as your name, address, telephone numbers, e-mail addresses, credit card information, PayWhirl or any other form of payment.

- We do not utilize “cookies” in connection with our website. A “cookie” is an online device used to determine when a visit to the site has occurred and to track your activity within the site. Cookies are often used online and do not harm your computer. You have the option of programming your computer to prevent a cookie from being accepted.

## **SECTION 5: NON-PUBLIC INFORMATION**

Of the non-public personal information we collect, we may disclose the following types of information about you to affiliated and non-affiliated third parties:

- Information we receive from you on applications or other forms, such as your name, address, telephone numbers, and e-mail addresses.
- Information about your transactions with us, third parties affiliated with us, or others, such as your name, address, telephone numbers, and email addresses.

## **SECTION 6: AGREEMENTS AND EXPLANATION OF OPT OUT RIGHT**

We may also disclose the information stated above (Section 5) to third parties that perform marketing services on our behalf or to other institutions with whom we have joint marketing agreements, such as third parties who sell products and/or services, or our affiliates and third-party vendors. If you do not want us to disclose and share your information, please opt out by mail:

You may complete the attached Opt Out Form and return it by mail within thirty days of your receipt of the Form to: Qwetrust Unique - 35 Calle Juan

Borbón - PMB 233 - Guaynabo, Puerto Rico 00970 OR, you can opt out by phone: You may contact at **1-786-408-9190** within thirty days of your receipt of the attached Opt Out Form.

## **SECTION 7: HOW WE PROTECT THE NONPUBLIC PERSONAL INFORMATION COLLECT ABOUT YOU**

We take our responsibility to protect your non-public personal information very seriously. Whenever we collect information about you, we may restrict access to your non-public personal information to our employees and those third parties who need the information to respond to your inquiries, to provide better customer service, and to provide products, services, and other promotional information we believe may help meet your needs or be of interest to you. We explain the importance of protecting your non-public personal information to our employees and take appropriate measures to enforce employee responsibilities regarding our Privacy Policy. We also maintain physical, electronic, and procedural safeguards to protect the confidentiality and security of the information we collect. We require any third party who receives information about you from us to agree to keep that information confidential and to use the information only for the purposes for which it was disclosed.

## **SECTION 8: THIRD PARTIES**

This Privacy Policy applies to us, as well as our affiliated third parties. These third parties affiliated or not, may use cookies, pixels, and web beacons to track the actions of users online over time and across different websites or platforms in order to deliver targeted electronic advertisements to an

individual user. We do not have access to or control over cookies, pixels, or web beacons that third party websites or partners may use. We are not responsible for the privacy practices or the context of these third-party websites. You are encouraged to review the policies of the different websites that you visit.

## **SECTION 9: TRANSFER OF DATA OUTSIDE YOUR COUNTRY OF RESIDENCE**

If you are located outside of the Commonwealth of Puerto Rico and you choose to use our service or provide information to us, your data may be transferred to, processed, and maintained on servers, databases or cloud storage facilities located in Commonwealth of Puerto Rico. Your use of the Services represents your consent and agreement to these practices. If you do not want your data transferred or processed or maintained in the Commonwealth of Puerto Rico, you should not use our services.

## **SECTION 10: SECURITY MEASURES**

Qwetrust Unique provides industry-standard physical, electronic, and procedural safeguards to protect personal data we process and maintain. We take reasonable measures to limit access to this data to authorized employees and contractors who need to know that information in order to operate, develop or improve our services. Please be aware that although we Endeavor to provide reasonable security for data we process and maintain, no security system can prove all potential security breaches. As a result, we cannot guarantee the security of any information you transmit on or through our platform and you do so at your own risk.

## **SECTION 11: CLOSING**

We will notify you of material changes to this Privacy Policy by at least thirty days before the effective date of the changes. If you do not agree to such changes following such notice, you should not use our platform prior to the time the modified privacy policy takes effect. If you continue using the platform after the modified privacy policy takes effect, you will be bound by the modified privacy policy.

We hope that you have found this information to be useful and appreciate the opportunity to continue to serve you in the future.