



DATA USE POLICY



1. Categories of personal data, purposes of processing and legal bases

• Website data

When you visit our website, we normally collect the following data from the website that derives from your use of it (among others): browser type and version, operating system used, website from which you visit us (referrer URL), website you visit, date and time of access to our website, and IP address. Your IP address is used to enable you to access our website.

You will be notified in a timely and appropriate manner of the use of your data, in the same way your personal information will be treated in a manner consistent with the purposes for which it was originally collected or for which you give your consent.

We may carry out the processing of your personal data on the following legal grounds: the processing is necessary to offer you our services, to enable the transmission of communication, and to maintain or restore the security of the networks and electronic services of communication, or to detect alterations and / or technical failures during the transmission of electronic communications.

• Account - Website (restricted area)

When you start as user and create a user account on our website to access the restricted area of the SGF Global website, we may ask you to enter the following personal data (among others): name and surname, date of birth, current job position and company where you work, postal address, email address, telephone number, personal address, password chosen for your account, and request to receive emails or a text message as a verification step, additionally we request a small summary of the skills you have and your resume. We process this user data for the following purposes: to provide you with access to materials in the restricted area of our website, to manage your application, to offer you the services we provide, to process contracts, to improve our website in accordance with usage patterns, to protect our secrets. business, for technical administration or for other purposes to which you have given your consent.

We may carry out the processing of your personal data on the following legal grounds: The processing is necessary to offer our services. Processing is also necessary to carry out a contract to which You are bound, or to perform actions to sign a contract at Your request. Additionally, the processing is necessary for the purposes of our legitimate interests or the legitimate interests of third parties (see above such interests), unless other interests or fundamental rights and freedoms that require the protection of your personal data take precedence. of said interests

• Application for work

When you apply for a job through our website, we may collect and process (among others) the following personal data about you: user data (as defined above), application date, application status and requests to the service of Customer Support. We process this personal data to fulfill our services that consist of providing human resources to our clients according to their needs, to perform customer service services, to comply with legal obligations, to defend, substantiate and exercise legal claims, to send marketing materials in the scope permitted by law and to analyze your interests for marketing purposes.

Within this section, we must inform that we will use your contact information to request additional information to complement the one already sent and to schedule interviews with our clients.



We may carry out the processing of your personal data on the following legal grounds: The processing is necessary to offer our services. Processing is also necessary to carry out a contract to which You are bound, or to perform actions to sign a contract at Your request. Additionally, the processing is necessary for the purposes of our legitimate interests or the legitimate interests of third parties (see above such interests), unless other interests or fundamental rights and freedoms that require the protection of your personal data take priority first. of said interests.

- **Employment and hiring of personnel**

Through the website you can apply for a job in the business group or for your clients. You will find more information about the data processing that takes place within the framework of the employment and recruitment sections of our website.

- **Other online forms and general communications with us:**

If you have questions, proposals, or comments, do not hesitate to send them to us. When you contact us (eg through an online form), we may collect and process (among others) the following personal data about you: name and surname, specialty, postal address, email address, number of phone, and your request. We process this personal data to be able to respond to your request.

We may carry out the processing of your personal data on the following legal grounds: The processing is necessary to offer our services. Processing is also necessary to carry out a contract to which You are bound, or to perform actions to sign a contract at Your request. Additionally, the processing is necessary for the purposes of our legitimate interests or the legitimate interests of third parties (see above such interests), unless other interests or fundamental rights and freedoms that require the protection of your personal data take priority first. of said interests.

In general, providing your personal data is voluntary, but in certain cases it is necessary to be able to sign a contract with us or receive our services / products as you have requested.

Failure to provide your personal data may cause you inconvenience - for example, certain products or services may not be delivered to you. However, if the contrary is not indicated, the fact of not providing your personal data does not entail legal consequences for you.

- 1. Transfer of data to third parties and international transfer of data**

- **Recipients within the SGF GLOBAL business group**

Your personal data may be received by different recipients within the SGF GLOBAL business group. Depending on the categories of personal data and in accordance with the purposes for which the personal data have been collected, your personal data may be received by different SGF GLOBAL companies and the internal departments of said companies. For example, our information technology department may have access to your user account data, and our marketing and sales departments may have access to your user account data or data in connection with your product orders. Additionally, other departments within the SGF GLOBAL business group, such as the legal department, the finance department or the internal audits department, may have access to certain personal data about you in accordance with the "Need to Know" principle. (I need to know).



- **Other receivers**

In accordance with current legislation on data protection, we may transfer your personal data to authorities of criminal prosecution, government, justice, legal advisers, external experts, or business partners. In the event of a business merger or acquisition of a company, personal data may be transferred to third parties that participate in such mergers or acquisitions. We will not transfer your personal data to third parties without your permission for advertising, marketing, or other purposes.

The personal data that we collect or that you provide us may be transferred to recipients within and outside the European Economic Area ("EEA") and they may process them. Some of the non-EEA recipients must have the EU-US Privacy Shield certification, while others must be in countries with adequacy decisions, especially Argentina, Canada (for non-official institutions subject to the Canadian Personal Information Protection and Electronic Documents Act) and Switzerland; In this way, it is guaranteed that in any case the transfer offers an adequate level of data protection from the point of view of European data protection legislation. Other recipients could be in countries that do not offer an adequate level of data protection from the point of view of European data protection legislation. We will take all necessary measures to ensure that any transfer of data outside the EEA is adequately protected in accordance with current data protection legislation. In relation to the transfer of data to countries that do not offer an adequate level of data protection, we will base any transfer on adequate safeguards, such as standard data protection clauses adopted by the European Commission or a supervisory authority, codes of conduct approved together with legally binding and punishable commitments by the recipient, or approved certification mechanisms together with legally binding and punishable commitments by the recipient. You can request a copy of such appropriate safeguards by contacting us.

2. What rights do you have and how can you exercise them?

If you have given your consent to a certain type of collection, processing and use of your personal data, you can revoke your consent at any time with future effect. Additionally, you can object to the use of your personal data for marketing purposes (free of charge), without incurring more costs than the transmission costs in accordance with the basic rates (below you will find additional information on the right to object).

By virtue of current legislation on data protection, you may have the following rights: (i) access to your personal data; (ii) rectification of your personal data; (iii) cancellation of your personal data; (iv) restriction of the processing of your personal data; (v) data portability; (vi) opposition to the processing of your personal data (including opposing the profiling of the data [profiling]); and (vii) other rights in relation to automated decision making.

Keep in mind that the rights mentioned above may be modified within the framework of current legislation on data protection. Below you will find additional information about your rights:

a. Right of access to your personal data:

You may have the right to ask us to confirm whether personal data about you is being processed and, if so, to request access to such personal data. The information that can be consulted in said access includes - among others - the purposes of the processing, the affected categories of personal data, and the recipients or categories of recipients to whom the personal data have been or will be communicated.



You may have the right to request a copy of the personal data currently processed. If you request more copies, we may charge you an appropriate fee based on processing costs.

b. Right of rectification

You may have the right to ask us to rectify personal data about you if it contains errors. Depending on the purposes of the processing, you may have the right to ask us to complete the personal data if it is incomplete, including by providing an additional statement.

c. Right of cancellation

In certain circumstances you may have the right to require us to delete personal data about you, after which we may be obliged to delete such data.

d. Right of restriction of processing

In certain circumstances you may have the right to require us to restrict the processing of your personal data. In this case, the corresponding data will be determined, and we can only process them for specific purposes.

e. Right of data portability

In certain circumstances, you may have the right to request that we provide you with the personal data that you have provided us in a structured, customary, and machine-readable format, and you may have the right to transfer said data to another controller without our being able to oppose.

f. Right of objection

In certain circumstances, you may have the right to object at any time to the processing of personal data about you for reasons arising from your special situation, after which we may be obliged to no longer process your personal data. This right to object may apply especially if SGF GLOBAL collects and processes your personal data for profiling purposes in order to better understand your commercial interests for SGF GLOBAL products and services. Additionally, you can exercise your right to object to your data being used for direct marketing through personal visits, postal mailings or - in the case of an ongoing business relationship - emails. If you have a right to object and exercise it, we will no longer be able to process your personal data for these purposes. To exercise this right, contact us as described in section. 6 (Contact).

However, this right of opposition cannot be given particularly if the processing of your personal data is necessary to carry out actions before signing a contract, or to carry out an already signed contract.

g. Other rights in relation to automated decision making

Additionally, in certain circumstances in relation to automated decision making, you have the right to request human intervention, express your position and challenge the decision.

To exercise your rights, please contact us using the following link <http://www.sgfglobal.com/contact.php>, or send us an email to: soporte@sgfglobal.com



You also have the right to lodge a complaint with the competent data protection authorities. You can exercise this right in a supervisory authority, particularly in the member state where you usually reside or work, or in the place where the alleged infringement has occurred.

