

Privacy Policy of eCommerce Institute

Effective Date: September 2023

At the Latin American Institute of Electronic Commerce and eConfidence (hereinafter "eCommerce Institute"), we place great importance on the protection of the personal data of all our users and members (hereinafter "Users" or "Personal Data Owners" or "Owners"). Therefore, we focus on complying with applicable regulations and the highest standards in the field to provide our Users with the best experience.

We understand that it's important for our Users to know how we use their personal information, with whom we share it, and what security measures we take to protect it. Therefore, in this document (hereinafter, the "Privacy Policy"), we explain, as clearly as possible, what data we collect, how we process it and for what purposes, with whom we share it, and what the rights of the Owners are when they access, browse, or use the services, as described in the section "Application of this Privacy Policy."

The Privacy Policy is complementary to the Terms and Conditions of eCommerce Institute.

Application of the Privacy Policy

These Privacy Policies apply to all sites and services owned or operated by eCommerce Institute, its applications, platforms, social media accounts, or its linked websites (collectively "ecommerce.institute" or "we," the "eCommerce Institute Sites," the "Sites," or "our Sites").

The policy also applies to all registration forms or participation in events, seminars, webinars, conferences, promotional actions, courses, or any other activity organized or sponsored by eCommerce Institute, or made available to the public on its Sites, third-party websites, or similar sites, through emails, or by any other means it deems appropriate. It does not apply, however, to sites that Users may access through links or any other type of link inserted on eCommerce Institute Sites.

By accessing, browsing, and using eCommerce Institute Sites, or the services and technologies available through them, the User consents to include the personal data provided to us in the databases owned and under the responsibility of eCommerce Institute, as well as the processing of their personal data for the purposes described in the following sections of this document.

BY ACCESSING, CONNECTING, OR OTHERWISE USING THE SITES OF ECOMMERCE INSTITUTE OR THE SERVICES OR TECHNOLOGIES AVAILABLE THROUGH THEM, THE USER CONFIRMS THAT THEY HAVE READ, UNDERSTOOD, AGREED, ACCEPTED, AND EXPRESSLY CONSENTED TO THESE PRIVACY POLICIES. IF YOU DO NOT AGREE TO THESE POLICIES, WE RECOMMEND NOT USING THE SITES OF ECOMMERCE INSTITUTE OR THE SERVICES AND TECHNOLOGIES AVAILABLE THROUGH THEM.

Data Controller - Contact

The Latin American Institute of Electronic Commerce and eConfidence ("eCommerce Institute"), with Tax ID [30709440213], domiciled at 25 de Mayo 611 3° – CP C1002ABM, Autonomous City of Buenos Aires – Argentina, is responsible for the processing of personal data collected through the eCommerce Institute Sites.

eCommerce Institute's databases are properly registered with the National Register of Databases of the Access to Public Information Agency.

For any inquiries or complaints, the User can contact us via email at contacto@ecommerce.institute or through WhatsApp at +54 9 11 5906 5540.

Types of Users

User-Applicant or Participant: Those Users who complete online forms made available through the eCommerce Institute Sites, including through service provider sites linked to the Institute, with the aim of participating in events, seminars, webinars, conferences, promotional actions, courses, receiving newsletters or updates, or any other activity or program organized or sponsored by eCommerce Institute independently or in conjunction with third parties (hereinafter "Activities") promoted by the institution. When Applicants effectively participate in the Activities, they are considered Participants.

User-Newsletter: Those Users who subscribe through forms on the eCommerce Institute Sites to receive information or subscribe to Activity alerts, to whom newsletters, promotional information, marketing, and advertising of products and/or services and/or contests and/or Activities of eCommerce Institute and/or third-party companies related to or affiliated with eCommerce Institute in any way will be sent, with an option for the User to unsubscribe.

User-Chamber or Association: Those Users who are part of a Chamber or Association that is part of the eCommerce Institute network and who, as such, participate in various eCommerce Institute Activities or use the eCommerce Institute Sites.

Visitor User: Those Users who visit the eCommerce Institute Sites.

Data Collection and Processing We Perform

Through the eCommerce Institute Sites, and by accessing the services available through them, eCommerce Institute may collect and request certain data from Users, including personal data, which is information that can identify the User.

eCommerce Institute may collect or request different types of personal data from Users, depending on their User category, as detailed below.

Certain data requested by eCommerce Institute is necessary for the registration and/or participation of the User in Activities. If this data is inaccurate, incomplete, or false, the User's registration, application, and/or participation will be hindered or prevented.

The User understands that they will be solely responsible for the truth, accuracy, completeness, validity, authenticity, and certainty of the information provided, and must promptly notify any updates or modifications as appropriate. Notwithstanding the foregoing, eCommerce Institute may verify the Personal Data and/or information provided - on its own or through third parties - by resorting to public entities, specialized companies, among others, which the User expressly consents to.

The data collected and requested by eCommerce Institute are as follows, depending on the User type:

User-Applicant/Participant: Name, Last Name, Position, Company, Country, Email, and Mobile Phone. Additionally, on an optional basis, the User may provide a LinkedIn link and a message for eCommerce Institute to review the application. Finally, in some Activities, the User will be asked to provide contextual information related to the Company where they work, including its industry, the reason for wanting to participate in the event or activity, as well as information related to their participation preferences in various sections of the Activity in question, to improve their experience.

User-Newsletter: Name, Last Name, Email, and Country.

Purposes of Data Processing

We process the personal data of our Users for the following purposes and with the following justifications:

Responding to Queries: To respond to queries made by the User through our Sites and/or available contact channels, we will request the User's name and surname, position, company, mobile phone number, and email.

Sending Confirmation Messages: To send Users messages confirming their registration for Activities they have registered to participate in and to enable their access to the respective activity or program, whether in-person or virtual.

Communication with Participants: To contact Users who have participated in any Activity and send them information related to the Activity in which they participated, such as sending presentations or documents shared during the Activity.

Account Status and Notifications: To inform Users of the status of their User account (if applicable) or to notify them of any changes to the Terms and Conditions of eCommerce Institute Sites, its Terms and Conditions, or this Privacy Policy, or other applicable Policies.

Device Information: Data regarding the browser used, mobile operator, brand, model, and operating system of the device, IP address, and geolocation of the device from which the User accesses eCommerce Institute Sites are necessary to provide a better quality of service to Users. It also allows eCommerce Institute to analyze access trends to its services and make improvements to continuously offer better quality of service.

Contact Information for Newsletters: Contact information may be used to send relevant information to User-Applicants/Participants and Newsletter Users, including promotional information, marketing, and advertising of products and/or services from eCommerce Institute and/or third-party companies or entities related to or affiliated with eCommerce Institute in any way, newsletters, or other formats, always with the option for the User to unsubscribe.

Communication: To communicate with the User and send our promotional materials or those of third-party entities related to eCommerce Institute and/or other communications related to the services that they have hired or inquired about, in which they are participating or have shown interest in applying for or participating in.

Web Analytics: To analyze how Users use eCommerce Institute Sites using third-party web analytics services that use technologies such as cookies, network server logs, and web beacons for business, statistical, quality control, or promotional purposes. The User can find more information about our use of cookies at the end of this document in our Cookie Policy.

Tools and Services: For the use of various tools created and/or used by eCommerce Institute to provide services more efficiently and relevantly to Users.

eCommerce Institute will use Users' Personal Data in accordance with these Privacy Policies and current and applicable regulations and will not disclose it, except in the case of a judicial or competent authority request.

If we decide to use the personal data we collect in a different way from that described above, we will communicate it specifically at the time of collection.

Sharing User Data

The User expressly and knowingly consents to eCommerce Institute sharing the collected data with entities with which eCommerce Institute has agreements or conventions in place for the purposes indicated. In particular, the Data Subject consents to their data being shared with entities related to eCommerce Institute, such as local Chambers of Electronic Commerce or Associations related to the Electronic Commerce industry that are part of its network, as reported on the eCommerce Institute website at this link: <https://ecommerce.institute/quienes-somos/>, as well as with partners, business partners, or sponsors of Activities carried out by eCommerce Institute independently or jointly with other entities. In such cases, the entities receiving data from Users may only use it for the purposes described in these Policies, and it is expressly prohibited to use the received data for purposes other than those for which consent was granted, unless such entities request the express, free, and informed consent of Users for any other purpose and obtain it.

At any time, the Data Subject has the right to revoke their consent for the transfer of their data as described here by sending an email requesting revocation to contacto@ecommerce.institute.

eCommerce Institute may also share the data collected with:

Service Providers: Due to the complexity of our services, there are some companies or entities that provide us with services that involve the processing of personal data. Therefore, User data will be shared with our hosting service providers, cloud storage providers, technology providers, information security providers, audit service providers, accountants, or legal service providers, among others. Our providers provide services in accordance with our instructions and the purposes detailed in these Privacy Policies. We do not authorize them to disclose or reveal the personal data of our Users except for those uses that are strictly necessary for the provision of the services on our behalf, or to comply with legal obligations.

Public Authorities: We share information with administrative and judicial authorities that, in the exercise of their authority, require information from eCommerce Institute, our service providers, and/or our business partners, even if there is no executive or judicial order or summons for this purpose, for the following purposes: (a) collaborating in the investigation and reporting of fraud, piracy, violations of intellectual or industrial property, or any other illicit activity or circumstance that could generate legal liability for eCommerce Institute and/or its users; (b) safeguarding public interest, the administration of justice, the recognition, exercise, or defense of a right in a judicial or administrative process, and/or dispute resolution; and (c) complying with applicable laws, regulations, or legal provisions or a duly founded and motivated order from a competent authority.

Officials: Whether they are judicial, administrative, government, or dispute resolution officials. We share information with authorities, courts, conciliators, mediators, or entities involved in the resolution of disputes to resolve disputes that may arise in which we have any kind of involvement or participation.

Finally, we also share information to: (a) protect and defend our rights or property; (b) protect the personal safety of our employees, agents, representatives, or users; and/or (c) preserve the integrity of our online community of services.

In the event that you disclose personal information through the use of our services, communities, forums, events, talks, webinars, and other social or interactive features, this information may be collected, used, and disclosed by third parties, over whom eCommerce Institute has no control or responsibility.

International Data Transfer

The data collected may be transferred internationally to third parties, for the purposes and in the manner indicated in these policies, even to countries or jurisdictions that may not have the same data protection regulations as exist in Argentina, and therefore, may have lower protection, which you understand and consent to.

When we transfer the personal data of our users, we protect them in the manner described in these policies. We verify that the recipients of your data are in countries whose legal framework provides an adequate level of data protection so that the personal data of our users are processed securely and with the same guarantees as in Argentina. Otherwise, when we transfer your personal data to recipients in countries with lower protection, we protect them by implementing safeguards that guarantee an adequate level of data protection under the terms of Law 25.326 and the regulations issued by the Access to Public Information Agency.

User Rights

Users, as Data Subjects, have the following rights:

a) Right of access: In order to know whether we are processing your personal data. If we are processing them, we will provide you with all the relevant information. Regarding the Right of Access, we inform the User, in compliance with Provision 10/2008, that as the owner of their personal data, they have the right to access them free of charge at intervals of no less than six months unless a legitimate interest is demonstrated, as established in Article 14, paragraph 3 of Law No. 25.326".

b) Right to rectification: The data subject may request the rectification of their personal data that concern them and are inaccurate.

c) Right to update: The data subject may request the update of their personal data that concern them and are outdated.

d) Right to erasure: The data subject may request the erasure of their personal data that concern them in the following situations: (i) personal data are no longer necessary in relation to the purposes for which they were collected or processed; (ii) if the processing of personal data has been based on consent, and this consent has been withdrawn, provided that the processing in

question is not based on another legal basis; (iii) if there is opposition to the processing; (iv) if personal data have been processed unlawfully; (v) if personal data must be deleted to comply with a legal obligation. Since it is necessary for us to have certain personal data from the data subject in order to provide access to eCommerce Institute services, the deletion of certain personal data may result in the User losing total or partial access to eCommerce Institute services.

How to Exercise Your Rights as a User with eCommerce Institute?

Users can exercise these rights with eCommerce Institute by sending an email to contacto@ecommerce.institute

To do this, we request that the User specify which rights they wish to exercise, the reason for their claim, and provide, if applicable, the personal information in question.

In cases where the User exercises the right of access, in compliance with applicable regulations, we will respond to their request within ten (10) consecutive days from the date of receipt, following verification of the User's identity. When the User requests rectification, updating, or erasure of their information, we will respond within five (5) business days from the date of receipt, following verification of their identity.

Finally, the User has the right to withdraw their consent for us to process their data at any time by sending a message for this purpose to contacto@ecommerce.institute."

Links to Other Sites

eCommerce Institute Sites may contain links to other websites for your convenience and information. These linked websites may be operated by entities not affiliated with eCommerce Institute. Typically, these linked websites have their own privacy policies or notices, so we recommend that Users read them when visiting such sites.

eCommerce Institute assumes no responsibility for links to third-party websites or for the content of websites other than our own, as well as for the use made of such websites, or their privacy practices, beyond what is expressly indicated in these privacy policies.

Security Measures

At eCommerce Institute, we comply with personal data protection regulations and the highest standards in the field to provide our Users with the best experience.

When the User provides us with their personal information, we keep it in strict confidentiality and reserve. eCommerce Institute will only use your data to the extent that your relationship with eCommerce Institute is valid and strictly uses it for the purposes detailed above. In this sense, all your data will be stored in a database owned by eCommerce Institute, which is registered in the National Registry of Personal Data Protection.

To ensure the security of your personal data, we adopt administrative, technical, and physical security measures specially designed to protect the personal data you provide us from their destruction, loss, alteration, access, communication, or accidental, illegal, or unauthorized use. We apply the same criteria and the same degree of diligence that eCommerce Institute applies to safeguard its own information. We consider the security standards and procedures established by the relevant regulations and continuously evaluate new technologies to protect this information.

However, as is known, the existing technical means that provide security are not impregnable, and even if we take all reasonable security precautions, it is possible to suffer manipulations, destruction, and/or loss of information.

For all these reasons, when the User considers that their interaction with eCommerce Institute is no longer secure (for example, if the User believes that the security of their account has been compromised), we request that you notify us immediately using the communication channels that we provide in the "Data Controller - Contact" section.

Retention Period of Personal Data

We will keep the personal data of our Users for as long as their relationship with us is valid, and for 10 (ten) years and/or for the additional period required by applicable legislation for accounting and/or legal purposes.

Complaints

At any time, the User may contact us through our contact channels to file a complaint regarding a violation of their rights regarding the processing of their personal data. In such a circumstance, we will take care of correcting the situation as soon as possible.

However, if the User believes that they have not obtained full satisfaction in the exercise of their rights, they may file a complaint with the Access to Public Information Agency (AAIP) located at Av. Pte. Gral. Julio A. Roca 710, 5th floor - Ciudad Autónoma de Buenos Aires. This agency is the regulatory body for Law No. 25.326, and it has the authority to address complaints and claims related to non-compliance with personal data protection regulations."

Please note that this translation is for informational purposes, and the accuracy of legal texts is crucial. You should consider consulting with a legal professional for precise translations of legal documents.

COOKIE POLICY

What are Cookies?

Cookies are small pieces of text, typically consisting of letters and/or numbers, that are sent by the visited website and stored by the software (e.g., a web browser) installed on the user's device for browsing. Cookies are sent back to the mentioned website the next time the user visits it.

Cookies allow information about a user's visits to a website to be stored and are a very useful technology, as they, for example, enable websites to function, making them more efficient, and provide useful information to website operators. Without cookies or similar technologies, websites would have no way to "remember" information about visitors, such as the number of items a user has placed in their shopping cart or whether they have logged in or not.

Cookies can be classified based on:

Duration - Session or Persistent Cookies: Session cookies expire at the end of a browsing session (typically when the user closes their browser) and are useful, for example, for storing a user's shopping order or for security purposes, such as when accessing their online banking or webmail account. On the other hand, cookies stored for a longer period (between sessions) are called persistent cookies and are useful, for example, for remembering user preferences or delivering targeted advertising.

Source - First-party or Third-party Cookies: The distinction between first-party and third-party cookies refers to the website or domain that installs the cookie. First-party cookies are installed directly by the website the user is visiting, while third-party cookies are installed by a different domain than the one the user is visiting, for example, when the website incorporates elements from other sites, such as images, social media plugins, or ads.

Purpose - Technical, Analytical, or Profiling Cookies: These will be analyzed in the "Categories of Cookies and Their Purposes" section.

It should be noted that the purposes typically fulfilled by a cookie can also be fulfilled by other similar technologies, including the use of certain device identification features to analyze website visits.

This policy applies to any technology that stores or accesses information on the user's device. This may include, for example, local storage of HTML5, Local Shared Objects (also known as flash cookies), and fingerprinting techniques. Specifically, device fingerprinting is a technique that involves combining a set of information to uniquely identify a specific device. Some examples of information that device fingerprinting can detect, associate, or infer include:

- Device configuration data;
- Data inferred from the use of certain network protocols;
- JavaScript;
- HTTP header information;
- Clock information;
- Installed fonts;
- Installed browser plugins.

In the future, when referring to cookies, this definition will also include other similar technologies.

Why is it necessary to provide your data?

For some processing purposes (e.g., to receive newsletters, to use our services, or to allow you to browse our website), it is necessary for you to provide us with your data, without which we cannot provide our services. For other purposes (e.g., profiling), we can only process your data with your consent.

Categories of Cookies and Their Purposes

Technical cookies are necessary for the operation of the website because they allow functions to facilitate user navigation. For example, users can access their profile without having to log in each time or select the language they want to use for browsing without having to configure it each time. Technical cookies are considered strictly necessary because storing information is essential to provide a service requested by the user. Therefore, you expressly consent to our use of technical cookies, which cannot be disabled. If you do not want your data to be processed by technical cookies, you should not browse our Sites and should refrain from signing up for any of our Activities.

Analytical cookies, which can be first-party or third-party, are installed to collect information about website usage. In particular, they are useful for statistically analyzing accesses or visits to the website and for allowing the controller to improve its structure, navigation logic, and content. The collected information (including the masked IP address) is used for statistical

analysis in order to improve website usage and possibly make the content more interesting and relevant to user preferences. By browsing our Sites or using the services included in them, you expressly consent to our use of analytical cookies. As these are not necessary for the operation of the website, you can disable them through your browser as indicated below or by disabling them through the cookie notice we provide.

Profiling cookies, which can be first-party or third-party, are used to track user navigation, analyze their behavior for marketing purposes, and create profiles of their tastes, habits, choices, etc. This allows, for example, sending targeted advertising messages based on user interests and in line with user preferences expressed while browsing online. You expressly consent to our use of profiling cookies unless you specifically disable them through the cookie notice we provide. These cookies also include social cookies.

How are Preferences Managed?

When accessing any page of the Site for the first time, a banner is displayed containing:

- A brief cookie policy,
- A button through which the user can accept all cookies,
- A button through which the user rejects the installation of cookies, except for technical cookies,
- A button ("more options") that allows access to a control panel through which the user can select the different types of cookies to be installed.

Consent to the use of cookies is recorded with a "technical cookie."

Are There Other Ways to Manage Cookies or Review Settings?

Users have other ways to manage the use of cookies, as well as the ability to review previously expressed preferences and consents at any time.

Users can intervene at any time to modify or revoke any consent given through the "Cookie Center" link located in the footer of each site. By selecting this link, the cookie notice will reopen, where users can express their updated preferences.

However, users can also express their cookie preferences through the settings of the browser used. By default, nearly all web browsers are configured to automatically accept cookies, but users can change the default settings through the settings of the browser used, allowing them to delete/remove all or some cookies, block the sending of cookies, or limit them to certain sites.

DISABLING/BLOCKING COOKIES OR DELETING THEM MAY AFFECT THE OPTIMAL USE OF CERTAIN AREAS OF THE SITE OR PREVENT CERTAIN FUNCTIONALITIES, AS WELL AS AFFECT THE OPERATION OF THIRD-PARTY SERVICES.

Cookie management settings depend on the browser used. Below, you will find instructions and links to guides for managing cookies on major desktop browsers:

Google Chrome: Click on the icon with three dots in the upper right corner, then select "Settings." Choose "Advanced" and under "Privacy and security," click on "Site Settings." You can adjust cookie settings by selecting "Cookies and site data." Here is the link for more information: [Google Chrome - Manage cookies](#)

Mozilla Firefox: Click on the icon with the three horizontal bars in the upper right corner and select "Options." In the window, choose "Privacy & Security" to adjust cookie settings. Here is the link for more information: [Mozilla Firefox - Enable and disable cookies](#)

Apple Safari: Select "Preferences" and then "Privacy," where you can adjust cookie settings. Here is the link for more information: [Apple Safari - Manage cookies](#)

For browsers other than those mentioned above, it is necessary to consult the relevant guide to learn how to manage cookies.