



KEO WORLD, INC.
PRIVACY AND DATA PROTECTION POLICY



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KEO WORLD, INC.
PRIVACY AND DATA PROTECTION POLICY

1. COMMITMENT TO PRIVACY

This Privacy and Data Protection Policy ("Policy") describes the ways Keo World, Inc. and any affiliate, subsidiary, companies of the same business group, current and future companies, stockholders, individuals, directors, managers, administrators, legal representatives, employees, contractors or any other related to or controlled by ("KEO") may collect, use, retain, process, share, transfer and disclose Personal Information, as defined below, in connection with its (i) products and services (collectively, the "KEO Services") and/or (ii) internal administration and control. You accept this Policy by using the KEO Services on our Website and/or our mobile applications, and by any other means.

KEO knows that you care about how your Personal Information is used and shared, and KEO takes your privacy seriously. Our primary goal is to provide you with exceptional service, and KEO understands that you may have questions or concerns regarding your Personal Information, as defined below, and how it will be used. To make this Policy easy to find, it is available on the home page of the KEO Website at <http://keoworld.com> (the "Website"). You may also e-mail us at privacyprotection@keoworld.com with any privacy-related questions, comments or concerns that you may have.

2. APPLICABILITY OF PRIVACY AND DATA PROTECTION POLICY

Throughout this Policy, KEO uses the term "Personal Information" to describe information that can be associated with a specific person and can be used to identify that person. Personal Information does not include information that has been anonymized, so that it does not identify a specific person or that is considered public.

This Policy applies to all Personal Information that KEO collects through our Website, mobile applications, agreements, partnerships, among others, from our users, clients, contractors, employees, stockholders, including you. This Policy also applies to any Personal Information gathered from you and share to any company of the same business group, third party or service provider (collectively third party and service provider, "Third Parties") for use in connection with (i) KEO Services, and/or (ii) internal administration and control. By means of the present, you hereby authorize KEO to review and share your information (including Personal Information) with Third Parties.

When KEO shares your Personal Information with any company of the same business group or/and to Third Parties who perform functions on our behalf ("Third Party Service Providers"), KEO requires the security and confidentiality of your information, as well as limiting their use of the information to what is reasonable and necessary to carry out their work and comply with applicable laws and regulations. For more information on how KEO

share your Personal Information with other parties see Section 6 (*How KEO Shares Personal Information with Other Parties*), below.

This Policy does not apply to Third Party Service Providers that you elect to access through the KEO Services or that you share information with directly. While KEO attempts to facilitate access only to those Third Party Service Providers that share our respect for your privacy, KEO does not take responsibility for the content or privacy policies of those Third Party Service Providers. KEO encourages you to carefully review the privacy policies of any Third Party Service Providers you access.

3. RIGHTS

Privacy and data applicable laws give you a number of rights that can be exercised at any time regarding any Personal Information that you have provided to KEO, as follows please find some of these rights

- The right to know what Personal Information is being collected about you.
- The right to know whether your Personal Information is transferred, sold and/or disclosed and to whom.
- The right to say no to the transfer, sale and/or disclose of Personal Information.
- The right to access your Personal Information.
- The right to equal service, even if they exercise their privacy rights.
- The right to request the deletion, removal and/ or update of your Personal Information.
- The right to opt-out of the sale and processing of your Personal Information

KEO takes a serious approach to safeguarding your privacy rights and respecting them by complying with the data protection regulation of Florida.

4. PERSONAL INFORMATION KEO MIGHT GATHER ABOUT YOU

The information KEO learn from its users, clients, contractors, employees, stockholders including you helps KEO personalize and continually improve your experience. Here are the types of information we gather.

- **Information You Give to KEO:** KEO receives and stores any information you enter on our Website, mobile application, or give us in any other way. You can choose

not to provide certain information. KEO uses the information that you provide for such purposes as responding to your requests and communicating with you.

- **Automatic Information:** KEO receives and stores certain types of information whenever you interact with us. When you visit the Website or use one of KEO's mobile applications, KEO collects your IP address and standard web log information. Additionally, like many Websites, KEO uses "cookies", and KEO obtains certain types of information when your web browser accesses the Website.
- **E-mail Communications:** To help us make e-mails more useful and interesting, KEO often receives a confirmation when you open e-mail from KEO if your computer supports such capabilities. If you do not want to receive e-mail or other mail from us, please adjust your communication preferences.
- **Information from Other Sources:** KEO might receive information about you from other sources and add it to our account information, always in compliance with the applicable law.
- **Public information:** KEO may collect Personal Information about you through publicly available information sources on the web. Given the vast amount of information indexable from the internet and public sources it may not always be possible to trace the exact source of your information.
- **From third parties:** KEO may collect Personal Information about you through other users, clients, contractors, stockholder, or other third parties who may share your Personal Information.
- **When you contact KEO:** If you contact KEO in any manner KEO will keep any information you provide including records of correspondence, and you should be aware that KEO monitor and may record telephone calls and written correspondence for training and security purposes.
- **Financial Information:** Bank accounts, routing numbers and cards linked to your KEO account. You may provide KEO with access credentials (for example, username and password) that allow it to gain online access to one or more accounts that you maintain with a third-party financial institution and that you choose to designate for use in connection with the KEO Services (each, an "Authorized Bank Account"). KEO works with one or more Third Party Service Providers that will securely store pursuant to industry standards any Authorized Bank Account access credentials that you provide to us. You may only provide account access credentials for and authorize KEO to access valid accounts that you hold in your own name. You may not provide access credentials for an account that is held by a third person. You must update your KEO account

information to reflect any change to the username or password that is associated with any Authorized Bank Account.

If you choose to provide your Authorized Bank Account credentials to KEO, you authorize KEO to use this information to provide you with KEO Services. This authorization will remain in effect until you notify us that you wish to revoke this authorization, which may affect your ability to receive KEO Services.

We are committed to provide a safe, secure and all-around great service. Therefore, before permitting you to use KEO Services, KEO may require additional information from you to verify your identity, address or other information or to manage risk and compliance throughout our relationship. KEO may also obtain information about you from Third Parties such as identity verification, fraud prevention and in compliance with applicable U.S. federal and state regulations. KEO also use computer safeguards such as firewalls and data encryption, we enforce physical access controls to our office and files, and we authorize access to Personal Information only for those employees who require it to fulfill their job responsibilities.

KEO makes reasonable efforts to ensure security on our systems. Despite our efforts, we cannot guarantee that Personal Information may not be accessed, disclosed, altered or destroyed by breach of our administrative, managerial and technical safeguards. Therefore, we urge you to take adequate precautions to protect your Personal Information as well, including never sharing your account password with anyone.

If KEO learns of a systems security breach, KEO may attempt to notify you electronically so that you can take appropriate protective steps. By using KEO Services, you agree that KEO may communicate with you electronically. KEO may post a notice on the Website if a security breach occurs. KEO may also send an email to you at the email address you have provided to us. Depending on where you live, you may have a legal right to receive notice of a security breach in writing. To receive free written notice of a security breach (or to withdraw your consent from receiving electronic notice of a security breach) you should notify us.

5. HOW KEO USES THE PERSONAL INFORMATION KEO COLLECTS

KEO's primary purpose in collecting Personal Information is to provide you with a safe, smooth, efficient, fun and customized experience. KEO may use your Personal Information, either directly or through a third party to:

- Collection, storage, use, circulation, or disposal.
- To carry out the pertinent steps for the development of the pre-contractual, contractual and post-contractual stage with KEO, with respect to any of the

products and KEO Services or, with respect to any underlying contractual relationship, as well as to comply with national or foreign law and the orders of judicial or administrative authorities.

- Manage procedures (requests, queries, complaints, claims), perform risk assessment, conduct satisfaction surveys regarding KEO Services and goods; the structuring of commercial offers and the remission of commercial information about products and/or services through the channels or media that KEO establishes for such purpose.
- Carry out, directly or through a data representative, marketing and advertising activities.
- Provide contact information and relevant documents to the sales force and/or distribution network, telemarketing, market research and any third party with which KEO has a contractual relationship of any kind.
- Transfer and/or Transmit the Personal Information inside and outside the country, to third parties as a result of a contract, law or lawful tie that so requires, or to implement cloud computing services.
- Perform through any means directly or through third parties and data representatives, programming and provision of technical service, sales, purchase, billing, portfolio management, monitoring product performance, collection, business intelligence, marketing activities, promotion or advertising, service improvement, collection monitoring, verification, consultation and control, enabling payment methods as well as any other related to our current and future products and services, for the fulfillment of contractual obligations and the corporate purpose of KEO.
- For the delivery and reception of goods or advertising material in accordance with the requirements of KEO's demanded functions and business sustainability.
- Provide KEO Services and to support your request;
- Process transactions and send notices about your transactions or your network activity;
- Resolve disputes, collect fees, and troubleshoot problems;
- Prevent potentially fraudulent, prohibited or illegal activities, and enforce KEO Services;

- Control and prevent fraud in any of its modalities and the implementation of measures aimed at the prevention of illicit activities.
 - Customize, personalize, measure, and improve KEO Services and the content and layout of our Website;
 - Send updates about new products and services that we are offering to clients.
 - Compare information for accuracy and verify it with Third Parties;
 - Perform other duties as required by law.
 - Control, handle and administrate the database of users, clients, stockholders, suppliers, contractors, allies, third parties and anyone who has a relationship with KEO.
 - Consult restrictive lists, sanction lists and/or databases of national or international organizations, related third countries, among others, with regard to or not, prevention, detection, monitoring and control of money laundering, financing of terrorism and financing of proliferation of weapons of mass destruction.
 - Comply with the counterparty's due diligence processes established in the applicable laws.
 - Consult and report on credit bureaus.
 - Contact and communicate directly through e-mail, phone numbers and address of the data holder.
 - Collect, use, retain, process, share, transfer and disclose personal information for use in connection with internal administration and control.
 - Reproduce and publish, photographs, images and videos of any employee.
- Identity verification and fraud prevention.
- Direct communications relating to KEO Services with attorneys, legal representatives, business representatives, and those to whom they authorize.
 - To perform directly or through a representative, collection activities.

- Reproduce and publish, photographs, images and videos of any employee, collected by KEO's corporate group on, (i) social networks, media and digital channels associated with KEO's corporate group, (ii) internal KEO's corporate group documents such as, announcements, communications, identification documents (iii) corporate documents, (iv) KEO's corporate group internal databases and, (v) KEO's corporate group Website

6. HOW KEO SHARES PERSONAL INFORMATION WITH OTHER PARTIES

KEO does not share your Personal Information with Third Parties for promotional or marketing purposes. However, KEO may use analytics service providers to analyze how you interact and engage with the KEO Services, so that KEO can learn and make enhancements to offer you a better experience.

KEO may share your Personal Information with:

- Law enforcement, government officials, or other Third Parties if we are compelled to do so by a subpoena, court order or similar legal procedure, when it is necessary to do so to comply with law, or where the disclosure of Personal Information is reasonably necessary to prevent physical harm or financial loss, to report suspected illegal activity, or to investigate violations of the KEO Services or as otherwise required by law.
- Controlling companies, affiliates, subsidiaries and companies belonging to the same business group.
- Third Party Service Providers who assist KEO in providing services to you or who provide fraud detection or similar services on our (or any vendor's) behalf.
- Service providers under agreement who help with parts of our business operations (for example, fraud prevention, payment processing, or technology services); KEO agreements dictate that these service providers only use your information in connection with the services they perform for us and not for their own benefit.
- Other Third Parties with your consent or at your direction to do so. When you broadcast information to Third Party services or providers, such information is no longer under our control and is subject to the terms of use and privacy policies of such Third Parties. We do not send your Personal Information to Third Parties social networks unless you have specifically requested or authorized us to do so.
- Other Third Parties to comply with the counterparty's due diligence processes established in the applicable laws.

7. HOW YOU CAN ACCESS, CHANGE OR DELETE YOUR PERSONAL INFORMATION

If you do not wish to have your Personal Information used by KEO, you may contact us as set out in Section 14 (*How to Contact Us*), below, to request the removal, destruction or elimination of any Personal Information that we have about you.

8. HOW DOES KEO KEEP YOUR PERSONAL INFORMATION SECURE

KEO follows generally accepted industry standards to protect the information submitted to us, both during transmission and once we receive it. However, no method of internet transmission or electronic storage is 100% secure. Therefore, while we strive to use commercially acceptable means to protect information, KEO cannot guarantee its absolute security.

9. DATA RETENTION

KEO keeps all Personal Information (i) as long as necessary to fulfill the purposes set out in this Policy, (ii) as long as we require to do so for backups, archiving, prevention of fraud and abuse, analytics, satisfaction of legal regulatory obligations, (iii) where otherwise reasonably believe that we have a legitimate reason to do so or, (iv) as defined in the applicable laws. Retention periods will be determined considering the type of information that is collected and the purpose for which it was collected, bearing in mind the requirements applicable to the situation and the need to delete outdated, unused information at the earliest reasonable time.

When deleting Personal Information, KEO will take measures to render such Personal Information irrecoverable or irreproducible, and the electronic files which contain Personal Information will be permanently deleted.

10. PROTECTION OF MINORS

KEO does not solicit or target persons under 18 years. KEO does not knowingly collect any information relating to children under the age of 18 years. If KEO discovers that a child under 18 years has provided personal information, or KEO have otherwise come into possession of personal information of a child, KEO will promptly delete such personal information from its systems.

11. LINKS TO OTHER SITES

The Website may contain links to other sites. KEO does not control the information collection of sites that can be reached through links from the Website. KEO encourage our, users, clients, contractors, employees, stockholders including you to be aware when they

are leaving the Website and to read the privacy statements of any site that collects personally identifiable information.

12. USE OF NON-PERSONAL INFORMATION

KEO uses the aggregate non-personal information about users, clients, contractors, employees, stockholders and professional individuals, that we collect:

- To improve the design, functionality, and content of KEO Services and to allow us to personalize it;
- To provide, maintain, personalize, protect, improve, and develop the products, programs, and services of KEO and to operate its business;
- To analyze usage and performance of the Website and services and for other research, analytical, and statistical purposes; and
- To tailor display advertisements for KEO and its affiliates, business partners, and selected third parties to offer you products, programs, or services

13. CHANGES TO OUR PRIVACY AND DATA PROTECTION POLICY

KEO is always improving. As our service evolves, KEO may occasionally update this Policy. If KEO modifies this Policy, it will post the revised Policy to the Website, and it will also revise the “last modified date” stated above. If we make material changes in the way KEO uses Personal Information, KEO will notify you by posting an announcement on our service or by sending you an e-mail. It is your responsibility to periodically review this Policy; users, clients, contractors, employees, stockholders including you are bound by any changes to the Policy by using the service after such changes have been first posted.

14. HOW TO CONTACT US

If you have questions or concerns regarding this Policy, or any feedback pertaining to your privacy and the KEO Services that you would like us to consider, please email us at privacyprotection@keoworld.com.



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