

PRIVACY POLICY

Last updated: Dec. 15, 2023

Purpose and Scope

AltaClaro Inc. is committed to protecting your privacy. This Privacy Policy (“Policy”) explains what personal information we collect through our online services, including www.altaclaro.com and other websites that link to this Policy (the “Services”), and how we use that information. We are committed to developing long-lasting customer relationships built on technical excellence, reliability, and trust.

Personal Information We Collect

In this Policy, the term “personal information” means any information relating to an identified or identifiable individual. The personal information we collect from you depends on how you interact with our Services. We use and process your personal information under this Policy based on your consent, which you are free to give, refuse or revoke.

Personal Information You Provide Directly to Us

You may choose to provide information to us such as your name, email address, and/or phone number, for instance by:

- Filling out a contact request form or survey, emailing us, or otherwise communicating with us online
- Providing us with your contact information in person, such as at a conference or other event
- Signing up for communications from us
- Interacting with us via the Services

Information We Collect Automatically

If you use or visit the Services, we may collect information from you automatically, such as your Internet Protocol (IP) address, device settings, MAC address, cookie identifiers, network provider, details about your browser, operating system or device, website(s) that referred you to our website, and how you interact with our Services, such as the pages on our Services that you visit and the time that you spend within the Services.

Cookies and Similar Mechanisms

Our Services may use cookies or other technologies that automatically collect information that allow us to provide and optimize our products and services. Cookies are small data files that are stored in web browsers to record and remember certain types of information, like a login or a preference you have set.

Our use of cookies falls into these categories:

- **Operationally Necessary:** These cookies are necessary for our site to function, such as cookies that display content, improve security and safety of our Services, and allow you to use the features on our Services.

- Performance Related: These cookies help us understand and assess how our Services are performing, and how users interact with our Services.
- Functionality Related: These cookies provide enhanced functionality on our Services, such as remembering your preferences or items you've viewed before.

How We Use Information

Most basically, we use your information to provide our products, services and information to you.

We may also use your information to:

- Improve or ensure the safety and quality of our Services
- Communicate with you about your account or updates to our Services or applicable policies
- Communicate with you about our offerings and promotions, or to inform you of changes in the industry that may be relevant for your business
- Conduct research and development
- Enforce our terms, policies, and agreements
- Protect vital interests or safety of others
- Comply with the law

We may use the information we collect to create de-identified and/or aggregated information, such as de-identified demographic information, de-identified location information, information about the computer or device from which you access our Services, or other analyses we create..

Disclosing Information to Third Parties

We do not sell personal information or share personal information for cross-contextual advertising.

We may disclose personal information:

- With third-party service providers, contractors and vendors who provide services such as IT services, data storage, and communications tools
- With our affiliated companies
- In the event of a sale, merger, acquisition, bankruptcy, or other liquidation event
- Where we have a good faith belief that sharing the information is required under law
- Where we have a good faith belief that sharing the information is necessary to protect the ours or another's safety, rights, or property
- If you direct us to do so

Your Choices

You may set certain preferences on your browser or device:

- Web browsers may allow you to disable cookies. Note that our website may not work properly without cookies.
- Web browsers may allow you to enable a "Do Not Track" setting. At this time, we do not honor these settings since there is no standardized mechanism.

You may have certain rights with regard to your personal information, such as the right to access, correct, or delete your information. If you would like to exercise these rights, please contact us at support@altaclaro.com.

Analytics and Advertising

We may use analytics tools to provide insights based on information such as IP address, referring web page, and information about how you interact with our Services.

In the future, third party vendors, including Google, may show AltaClaro ads on third party websites and other online media. Such third party vendors use cookies to serve ads based on a user's prior visits to our Services. Users may opt out of the use of cookies for advertising by changing the settings on your device or visiting the applicable opt-out page (e.g., on the Google site) and/or the Network Advertising Initiative opt out page.

Links to External Web Sites

The Services may contain links to third-party sites. While we try to link only to sites that share our high standards and respect for privacy, we are not responsible for the content, security, or privacy policies employed by such other sites. Please review their respective policies before submitting your personal information.

Security

We take reasonable steps to protect your personal information, but no system is perfectly secure, and to the extent allowable by law, we do not accept liability for unintentional disclosure of information.

Data Retention

We retain data for as long as necessary to fulfill the purpose for which it was collected, including to provide products and services, resolve disputes, enforce our agreements, establish and exercise legal defenses, conduct audits, and comply with the law.

Children's Information

We do not collect information from children under 13. If you believe a child has provided us with information, please contact us at support@altaclaro.com and we will delete the data from our systems.

Updates to this Policy

This Policy may change from time to time. If there are material changes, we will notify you as required by law.

Contact

If you have questions about our privacy practices or this Policy, please contact us at support@altaclaro.com.

Supervisory Authority

If you are located in the European Union, the United Kingdom or certain other jurisdictions, you have the right to file a privacy-related complaint with a Supervisory Authority in such jurisdiction.