

PRIVACY POLICY
AZABACHE USA, LLC

In accordance with the applicable data protection regulations, this Privacy Policy aims to help you understand the following:

1. Introduction

AZABACHE USA, LLC (hereinafter AZABACHE) is committed to protecting your privacy. This Privacy Policy explains how we collect, use, disclose, and protect your personal information in compliance with the laws of the United States.

2. Data Controller and Data Protection Officer

The Data Controller for the personal data you have provided is AZABACHE, with its registered office at 5900 Balcones Drive STE 100 AUSTIN TX 78731.

You can contact our Data Protection Officer at the following email address: info@azabache.travel or at our postal address mentioned above.

3. Data Collection

The personal data processed will be those that you provide to us through the various channels made available by AZABACHE.

Additionally, when you visit the AZABACHE site, various technologies are used to collect and store information, which may include the use of cookies or similar technologies to identify your browser or device. AZABACHE also uses these technologies to collect and store information when you interact with services offered by AZABACHE or other functions. You can find more information on how AZABACHE processes personal data obtained through cookies or as a result of your browsing if you accept the installation of cookies.

AZABACHE may collect or gather personal information from the following sources:

- a) **Information provided directly by the user.** To use AZABACHE's services as a Client, Merchant, Payer, or if you have any legal relationship with AZABACHE as a service provider or user, or are interested in contacting us or learning about AZABACHE, we may provide registration forms where you will be asked to provide your personal information, primarily to contact you and provide our services.
- b) **Information we obtain when the user uses our services.** We collect information related to the service we offer. The information obtained this way includes the following data: (i) IP address, (ii) cookies. This information will allow us to identify your browser or your AZABACHE account and serves as a security measure to protect information, as well as to prevent identity theft or other behaviors that put the user's or client's personal data at risk. We also collect information related to your payment habits (amount, frequency, merchants, products and/or services contracted, commercial behaviors, payment behaviors), movements, and transactions through AZABACHE, or any other information related to and generated by your interaction with the payment platform and its derived services.
- c) **Information we obtain from third parties** such as travel agencies, hotels, tourism-related businesses, credit offices, or identity verifiers, as well as from allied third parties whenever we can legally resort to these sources.

4. Information Collected

We collect the following personal information:

- **Personal Identification and Contact Information:** Name, address, email, phone number, etc.
- **Financial Information:** Payment details and transaction information.
- **Browsing Information:** Data about your use of our website and services.

The personal data collected by AZABACHE from its users includes information that, alone or in combination with other data provided or generated, allows you to be identified and/or characterized as an individual, or in applicable cases, as a business.

For this reason, and to ensure the proper provision of our services, such data may include name, phone number, email, electronic means of contact, social network location data, address, bank account number and ownership, personal identification documents, biometric data, handwritten signature, electronic handwritten signature, advanced electronic signature, employment data, data related to your family members, and personal images and videos provided voluntarily through the following sources:

- *Printed personal data*: Refers to the acceptance of providing personal data through documents submitted to AZABACHE during the admission, registration process, or at any other time when the user provides documents to this institution.
- *Directly collected images*: Refers to the acceptance of providing your personal images through video cameras installed in user service areas as part of AZABACHE's security protocols.

Any information that the user registers or provides to AZABACHE or that is generated from it and does not reflect or refer to a particular person or business, which allows individual identification, such as the amount of a transaction, the acquisition of a specific good or service, the payment method, the bank used, or information that is anonymous and/or hidden, among others, does not qualify as personal information.

5. Use of Information and Data

The personal data we collect from you will be used for the following purposes, which are necessary for the service you request:

- I. Provide the services and products that the user has requested;
- II. Process payment transactions made by the user on our platform;
- III. Verify the user's identity;
- IV. Authenticate and validate that payments made with credit cards are not fraudulent;
- V. Use the data provided by the user in security filters provided by third parties to AZABACHE, to validate transactions and mitigate the risk of identity theft of cardholders;
- VI. Safeguard user data in case they exercise their right of withdrawal on purchases made or if the purchases are subject to dispute or chargeback, to share transaction information and, if required, personal information with financial institutions responsible for resolving disputes or refunding resources for the withdrawal;
- VII. Use the user's personal data in transactional or monitoring reports that may be used by AZABACHE, its suppliers, or the client merchants to whom the user has paid, if the user is a buyer/payer;
- VIII. Compare the user's information to verify its accuracy;
- IX. Prevent AZABACHE's system from being used for illegal activities and enforce our Terms and Conditions of use of our services;
- X. Provide user support and troubleshooting services;
- XI. Provide AZABACHE users or client merchants or AZABACHE partners with assistance, including advertising or promotional services;
- XII. Inform the user about system or service failures and updates from AZABACHE;
- XIII. Contact the user or send notifications or emails;
- XIV. Resolve disputes;
- XV. Invoice the use of AZABACHE's services;
- XVI. Use the user's personal information for internal purposes, such as audits, reporting, data analysis or mining, and research to improve AZABACHE's products, services, and communications;
- XVII. Store the user's personal data for the time required to fulfill the purposes stipulated in this Policy or to meet contractual or legal obligations, always within the time limits established in commercial or privacy and personal data protection laws;
- XVIII. Personalize, measure, and improve the services provided by AZABACHE, as well as our websites and access to AZABACHE's services;
- XIX. Information related to the user's service usage habits, as well as related to their commercial activities on our platforms and the means of marketing our products and/or services, the final beneficiaries of the products and/or services, the clients of the users of our products and/or services, the user's payment information, access to our websites, their movements and transactions paid through AZABACHE, which may include reviewing the information of the client merchants to whom payments have been made through our system, as well as any other information related to and generated by the interaction with the payment platform and derived transactions, may be used for AZABACHE's analysis, which may be conducted by automated means and may involve the creation of profiles that can be processed for the development and/or improvement and/or offering of products and/or services, whether proprietary or in alliance with third parties, or for the offering of promotions or benefits, which at AZABACHE's discretion are in favor or of interest to the user and/or that may improve their interaction and use of AZABACHE and/or future developments. The described activities may be carried out by AZABACHE in cases where it acts as the Data Controller and may be subject to additional consent from you, where required by applicable law;
- XX. Request the user's opinion or participation in electronic surveys and send them commercial and advertising communications and information from AZABACHE companies, AZABACHE clients, or third-party allies, subject to additional consent where required by applicable law, regarding products and/or services, as well as promotions related to them, whether proprietary to AZABACHE, its clients, or allies;

- XXI. Organize and conduct contests, games, offers, or promotional or marketing operations, and similar events of AZABACHE and/or merchants linked or not linked to AZABACHE;
- XXII. Send discount coupons or provide benefits for future purchases through AZABACHE;
- XXIII. Propose your affiliation to loyalty programs, create user consumption profiles, and send you promotional and advertising materials that may be of interest to you;
- XXIV. Additionally, where applicable, the user authorizes AZABACHE to consult and report their information and behavior regarding financial obligations to credit, financial, commercial, or legally constituted service risk centers, or to other financial entities, in accordance with the law. AZABACHE may also perform credit risk profile validations based on the personal information provided by the user or generated by the user's use of our services;
- XXV. Make backups of the databases to protect them and ensure business continuity for AZABACHE. If you want more information about the backup processes, you can contact us;
- XXVI. The processing of the user's personal data may be carried out on AZABACHE servers or third-party servers contracted by AZABACHE, located in different countries worldwide. AZABACHE reserves the right to transfer or transmit the user's personal information outside the country of residence and domicile, ensuring that those countries have adequate levels of personal data protection as established in this Policy and applicable legislation.

Additionally, we will use your personal information for advertising purposes. It is worth mentioning that:

- I. AZABACHE does not commercialize or gain any profit from the use of your personal information;
- II. AZABACHE may combine your personal information with information from AZABACHE, related and affiliated companies of AZABACHE, or third parties to improve and personalize the content of advertisements, promotions, and advertising that may be of interest to you;
- III. If the user does not wish to receive advertising information or does not want their data to be used to parameterize and personalize their profile for marketing AZABACHE products and services, related and affiliated companies of AZABACHE, or third parties, the user may, at any time, request the cessation of the use of their personal data for these purposes through the means provided by AZABACHE for this purpose in this Policy.

If you do not want your personal data to be processed for these secondary purposes, you can communicate this to us through the following mechanism:

- Write an email to info@azabache.travel with the subject line "USE OF PERSONAL DATA."

Refusal to use your personal data for these secondary purposes will not be a reason for us to deny you the services and products you request or contract with us.

6. Disclosure of Information to Third Parties

Personal data may be communicated to the following recipients for the reasons explained below:

RECIPIENT	PURPOSE	BASIS
Public administrations; Courts and tribunals; Law enforcement agencies	To fulfill the legal obligations to which AZABACHE is subject for the development of its activity, and in legally foreseen cases, including obtaining subsidies and public aids.	To comply with a legal obligation.
Accounting audit firms	To fulfill the legal obligations of account auditing to which AZABACHE is subject due to its activity.	To comply with a legal obligation.

Companies that are part of the AZABACHE Group	We may communicate the data to other companies in the Group to offer you the best service considering your allergies and/or special needs and for other administrative purposes.	AZABACHE's legitimate interest recognized by the applicable data protection regulations.
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Additionally, to the providers who need to access your data to provide the services that AZABACHE has contracted with these providers, and with whom AZABACHE has signed confidentiality and personal data processing agreements necessary and required by law to protect your privacy.

AZABACHE will not share your data with other third parties without first obtaining your consent, except in cases where it is necessary to fulfill legal or contractual obligations to which AZABACHE is subject at any time due to its nature and activity.

If in the future AZABACHE makes other communications of personal data, you will be duly informed.

7. Data Retention

Personal data will be retained for as long as needed to fulfill the purposes for which it was collected and to comply with legal, financial, commercial, or informational requirements, or until you withdraw your consent. In some circumstances, we may anonymize personal data so that it can no longer be associated with you and we may continue to use this information. When we no longer need personal data, we will securely delete or destroy it.

AZABACHE will retain the collected data to carry out the above purposes as long as your relationship with AZABACHE continues and, even afterward, until the statute of limitations for any legal liability arising from it has expired.

8. User Consent

The user of AZABACHE's services, as the owner of their personal data, consents to the processing when they are on AZABACHE's websites, navigate within them, and use their features and services. Additionally, when asked to verify and approve the acceptance checkbox of AZABACHE's Terms and Conditions of Service and this Privacy Policy, the user consents to the processing of their personal data. Users are encouraged to familiarize themselves with this Policy before accepting it and providing their personal data for processing.

Users are not obligated to provide their personal information; however, if they choose not to, they may not be able to use some of our services or we may be unable to respond to their inquiries and needs. Users will always have access to this Policy by visiting our websites, either on the main page or in the Legal section.

AZABACHE may modify this Policy at any time. Modifications will be made known to users through publication on our website and will become effective from the moment of their publication, unless otherwise stated.

The user agrees that their personal information may be transferred between the various departments that comprise AZABACHE or to its entities in accordance with the applicable data protection law.

This AZABACHE Privacy Policy constitutes a valid agreement between the user and the company. Therefore, by using our services on our platforms and websites, not expressing opposition, providing personal data, and/or consulting their information, constitutes acceptance by the user of this Privacy Policy. If the user does not accept this Policy, they must immediately refrain from using AZABACHE's services.

9. User Rights

You have the right to:

- **Right to Know:** Request information about the categories and specific pieces of personal data we have collected about you.
- **Right to Delete:** Request the deletion of your personal data, subject to certain exceptions.
- **Right to Opt-Out of Sale:** Opt-out of the sale of your personal data.

How can you access, rectify, cancel your personal data, or object to its use?

You have the right to know what personal data we hold about you, how we use it, and the conditions of its use. Additionally, you have the right to request the correction of your personal information if it is outdated, inaccurate, or

incomplete; to have it deleted from our records or databases when you consider it is not being used properly; and to object to the use of your personal data for specific purposes.

To exercise any of the aforementioned rights, you must submit the respective request through the following means:

- Write an email to info@azabache.travel with the subject line "USE OF PERSONAL DATA"

What information and/or documentation should the request contain?

- Full name and address of the personal data owner, or other means to communicate the response to your request.
- Documents that prove the identity or legal representation of the personal data owner.
- Clear and precise description of the personal data for which you seek to exercise any of the aforementioned rights.
- Provide, if applicable, the documentation that supports your request.

¿En cuántos días le daremos respuesta a su solicitud?

15 business days.

¿Por qué medio le comunicaremos la respuesta a su solicitud?

By email or telephone call.

¿En qué medios se pueden reproducir los datos personales que, en su caso, solicite?

Electronic documents and/or simple copies.

10. Use of Tracking Technologies

Our websites and online services use cookies and other tracking technologies to enhance the user experience and analyze site usage. You may choose to disable cookies, but this may affect the functionality of our site.

Regarding the handling of Cookies and other technologies, please note the following:

- A. AZABACHE's websites, online services, email messages, and advertisements may use "cookies" and other technologies such as pixel tags and web beacons. These technologies allow AZABACHE to understand user behavior, indicate which parts of the websites were visited, and facilitate and measure the effectiveness of advertisements and web searches.
- B. By using AZABACHE's software or websites, the user consents to the use of cookies.
- C. The user can choose to reject cookies at any time. However, if they do so, they should be aware that some functionalities are only available through the use of cookies and will therefore not be available.
- D. The information collected by cookies and other technologies is treated by AZABACHE as non-personal information unless, in accordance with applicable legislation, it should be treated as personal information.
- E. Internet Protocol (IP) addresses and similar identifiers will be treated by AZABACHE as personal information when required by applicable legislation; otherwise, they will be considered non-personal information.

11. Changes, Modifications, or Updates

AZABACHE reserves the right to review this Privacy Policy at any time it deems appropriate, to reflect regulatory changes, best practices, or to update personal data processing activities. Therefore, it may undergo modifications, changes, or updates.

We are committed to keeping you informed about any changes to this privacy notice through: updating the privacy notice page and/or by email.

The procedure through which notifications about changes or updates to this privacy notice will be carried out is as follows:

Update of the Privacy Notice on the page: Publication on the website of the updated privacy notice.

Last update: May 27, 2024