

Privacy Policy

Applicable from May 21, 2025

INTRODUCTION

Your privacy is important to us at ANDRES BRAVO LTD, legal entity №: 15878043, having its registered address at 167-169 Great Portland Street, 5th Floor, London, United Kingdom, W1W 5PF (“SimetriaPay”, “we”, “us”, “our”).

This Privacy Policy (“Policy”) sets out how SimetriaPay collects, uses, transfers or otherwise processes your personal data when you sign up for, access, or use our services, features or functions offered on SimetriaPay website available at www.simetriapay.com (“Website”), and all related sites, applications, and services (collectively the “SimetriaPay Services”), submit your personal data in connection with a job application or prospective vacancies, or submit your personal data to SimetriaPay for any other reason.

By using or interacting with the Website or SimetriaPay Services, you, as a user of our Website or as our client (“User”, “Client” or “you”) agree to the provisions of this Policy and confirm that you have read and understood all the provisions stated in the Policy.

This Policy applies to personal data about individuals, it does not govern data about legal entities. The Policy also applies to all personal data relating to natural persons during a professional activity, such as the employees, authorized signatories of a company or organisation.

If you are submitting personal information of third parties to us, you warrant and represent you have their consent to provide their personal information to us for the purposes described in this Policy and you will indemnify us and hold us harmless from and against claims by such individuals relating to our processing and use of such personal information within the terms of this Policy.

Please note that other legal agreements or terms may also govern your data protection when you use SimetriaPay Services and Andres Bravo Ltd.

PERSONAL DATA WE PROCESS

We require the personal data we collect about you for a variety of reasons. We collect personal data about you to provide you with and manage SimetriaPay Services, to help SimetriaPay follow government regulations and otherwise comply with law, to communicate with you, and to help us personalize and improve your experience, as described in more detail below.

In general, we will use the personal data about you for the purposes described in this Policy. However, if we will need to process your data for other purposes, we will provide you with all the information relevant to such data processing at the point where it is collected.

I. To provide you DEMO for SimetriaPay Services

To arrange a demo, we ask you or your company's representative to provide us with the following information:

- Name
- Company name
- Job title
- Contact information including email address and phone number

We collect and process this data based on your consent.

II. To provide SimetriaPay Services

When you use SimetriaPay Services we may collect and process the following information about you or your company's representative:

- Name
- Company name
- Job title
- Contact information including email address and phone number
- The information you enter when you use SimetriaPay Services

We collect and process this data to perform a contract with you.

III. To communicate with you and provide customer services

If you send us query, request, or complaint, or you contact SimetriaPay using a contact form, we will collect and use the following data for the purpose of providing you with customer support services you request:

- Name, surname
- Email address
- Phone number
- Your message information
- Website (optional)

We collect and process this data based on your consent.

IV. To track cookies

We collect cookies, which are small files that a site or its service provider transfers to your computer's hard drive through your web browser (with your permission) that enables the sites or service providers systems to recognize your browser and capture and remember certain information.

See section "Cookies" below for more details.

V. Data collection in connection with job applications

When you submit your personal data in connection with a job application, we process personal data provided by you (including data specified in the enclosed CV, application letter, provided during an interview, etc.) to be able to evaluate your fitness for a particular position, complete selection procedures and provide you with a work offer.

We collect and process this data based on your consent when you apply to us for employment and delete it as soon as a contract is signed with the selected candidate.

VI. To send you our newsletters and marketing communication

When you subscribe to our newsletter, we process the email address provided by you to manage your subscription to the newsletter.

We collect and process this data based on your consent. You can choose to unsubscribe from the newsletter at any time using the links in the email received from us or by contacting us directly.

LEGAL BASIS FOR PROCESSING DATA

Our legal basis for collecting and processing personal data described in this Policy will depend on the personal data concerned and the specific context in which we collect it.

However, we will normally collect personal data from you only where:

- We need the personal data to perform a contract with you
- Where we have your consent to do so, or
- Where the processing is in our legitimate interests and not overridden by your data protection interests or fundamental rights and freedoms

Also, in some cases, we may also have a legal obligation to collect personal data from you. If we ask you to provide personal data to comply with a legal requirement or to perform a

contact with you, we will make this clear at the relevant time and inform you whether the provision of your personal data is mandatory or not.

WHEN WE PROVIDE YOUR DATA TO OTHERS

There are certain circumstances in which we may disclose, transfer, or share your personal data with certain third parties without further notice to you, as set forth in this Policy.

Service providers

We may disclose your personal data to our service providers and/or suppliers to perform certain business-related functions on our behalf that help make SimetriaPay Services available and functional. For this reason, we transfer your data to service providers which provide cloud and hosting services, IT security, maintenance and technical services, communications services, etc.

When hiring service providers, we take all necessary measures to ensure that our data controllers also implement appropriate organizational and technical security measures and keep the confidentiality of personal data.

Third parties for legal reasons

We may disclose your personal data where such disclosure is necessary for compliance with a legal obligation to which we are subject.

Third parties for re-organisation

Also, as we develop our business, we might sell or buy businesses or assets. In the event of a corporate sale, merger, reorganization, dissolution or similar event, personal data may be part of the transferred assets.

INTERNATIONAL DATA TRANSFER

In principle, SimetriaPay does not transfer personal data outside the European Economic Union and/or UK. Should such a transfer prove necessary, we will ensure that one of the following security measures will be applied:

- The contract to be signed with the data recipient is based on the Standard Contract Terms approved by the European Commission
- The data recipient is founded in a country recognized by the European Commission as having adequate data protection standards, or
- A permission from the relevant supervisory authority

YOUR PRIVACY RIGHTS

Subject to conditions and certain limitations established by law, you may have the rights to:

1. Access your data
2. Request correction of your personal data
3. Request erasure of your personal data
4. Request to restrict processing of your personal data
5. Object to processing of your personal data
6. Request to transfer your personal data to you or to a third party
7. Lodge a complaint with a supervisory authority, and
8. Withdraw your consent

1. The right to access data means you have a right to be informed of the data we collect and use and to request access or demand a copy of the data concerned.

Providing the rights and freedoms of others are not affected, we will supply to you a copy of your personal data. The first copy will be provided free of charge, but additional copies may be subject to a reasonable fee.

2. The right to request correction of your personal data. You have the right to have any inaccurate personal data about you rectified and, considering the purposes of the processing, to have any incomplete personal data about you completed.

3. In some circumstances you have a right to request the erasure of your personal data. Those circumstances include when:

- The personal data are no longer necessary in relation to the purposes for which they were collected or otherwise processed
- You withdraw consent to consent-based processing and there is no other legal basis to process data
- You object to the processing under certain rules of applicable data protection laws,
- The processing is for direct marketing purposes, or
- The personal data have been unlawfully processed

However, there are exclusions of the right to erasure. Such exclusions include when processing is necessary for exercising the right of freedom of expression and information, compliance with our legal obligation, or for the establishment, exercise, or defence of legal claims.

4. In some circumstances you have the right to request to restrict the processing of your personal data. Those circumstances are when:

- You want us to investigate whether it is accurate
- Processing is unlawful but you oppose erasure
- We no longer need the information, but you want us to continue holding it for you in connection with a legal claim, or
- You have objected to us using your personal data (see above), but we need to check whether we have an overriding reason to use it

5. You have the right to disagree (object) to the processing of personal data based on your specific situation in cases where we process your personal data for public interest purposes or based on our legitimate interest or the legitimate interest of third parties.

You have the right to object to our processing of your personal data for direct marketing purposes (including profiling for direct marketing purposes). If you make such an objection, we will cease to process your personal data for this purpose.

6. The right to request to transfer your personal data. Subject to the statutory criteria being met, to receive the data you have provided in a structured, current, and machine-readable form and to transfer this data to another data controller or, where technically feasible, to have it transferred by SimetriaPay. However, this right does not apply where it would adversely affect the rights and freedoms of others.

7. If you consider that our processing of your personal information infringes data protection laws, you have a legal right to lodge a complaint with a competent supervisory authority. In the UK this is the Information Commissioner's Office.

8. To the extent that the legal basis for our processing of your personal information is consent, you have the right to withdraw that consent at any time. Withdrawal will not affect the lawfulness of processing before the withdrawal.

HOW TO EXERCISE YOUR RIGHTS

To exercise your rights, you may submit a written request, complaint or claim to us by sending an e-mail to info@simetriapay.com

Please clearly state what information you are requesting and any other requests you are making. If having received your request, complaint or claim we have doubts as to your identity, we will have the right to ask for your identity document.

We will respond to your request, complaint or claim in writing, acting in accordance with the applicable laws and will do our best to provide you with information within the shortest time possible, but in no event later than within 30 days after receiving your request, complaint, or claim. In exceptional cases, the said 30-day period may be extended by another 30 days by giving notice to you.

We reserve the right, however, to limit or deny your request to the extent permitted by applicable law if:

- Complying with the request may present a threat to the personal safety, property, or rights of any other person or organization
- Complying with the request may lead to a violation of applicable laws or regulations
- We are not required to comply with the request because of a legal rule or exception, or
- You have failed to provide us with sufficient evidence to verify your identity. We will not delete personal data if that information is related to an ongoing transaction

Even after a request, we may also keep personal data where necessary to comply with applicable laws or where necessary to protect a legal right or fulfil a legal obligation.

COOKIES

When you access our Website or use SimetriaPay Services, we (including companies we work with) use cookies.

We use cookies to enable certain essential functions of the Website (“Functional Cookies”), to analyze and report usage statistics of the Website (“Performance Cookies”) and to provide interest- based advertising (“Advertising Cookies”). For Performance and Advertising purposes we use various third-party cookies, such as Google Analytics and Google AdWords. Further information on how we use each type of cookie is provided below, together with the option to change your cookie settings in relation to non-essential cookies.

You are free to decline our cookies if your browser or browser add-on permits unless our cookies are required to prevent fraud or ensure the security of Website we control. However, declining our cookies may interfere with your use of our Website and SimetriaPay Services.

Functional Cookies (essential)

These cookies are essential for the Website to function and cannot be switched off in our systems. They are usually only set in response to actions made by you, which amount to a request for services, such as establishing a session or setting your privacy preferences. These cookies do not store any personally identifiable information and they expire as soon as you leave the Website.

Performance Cookies

These cookies allow us to count visits and traffic sources so we can measure and improve the performance of our site. They help us to know which pages are the most and least popular and see how visitors move around the site. We use Google Analytics for this purpose. The data collected is not shared with any other party. The information we get through the use of these cookies is anonymised and we make no attempt to identify you, or influence your

experience of the site while you are visiting it. If you do not allow these cookies, we will not be able to include your visit in our statistics.

Advertising Cookies

These cookies are used by us and third parties to serve ads that are relevant to your interests. We use cookies to collect data about your online activity and identify your interests so that we can provide advertising that is most relevant to you. You can opt out of receiving interest-based advertising by leaving the checkbox above empty.

The cookie consent button will remain visible on our Website, and only Functional Cookies will be set, until it has been accepted or your cookie settings are changed.

In addition to the ability to change your cookie settings above, you have a variety of other tools to control the use of cookies and similar technologies, including browser controls to block or delete cookies, and controls from some third-party analytics service providers to personalize their services or to opt out of data collection.

If you have used a Do Not Track browser setting we take this as an indication that you do not want to allow non-essential cookies and they will be blocked. If you would like to delete all cookies or instruct your web browser to refuse cookies, please refer to the help pages of your web browser. However, please be aware that if you do delete cookies or refuse to accept them you might not be able to use all of the features of our Website or store your preferences and some pages might not display properly.

LINKS AND THIRD-PARTY WEBSITES

On the Website you may find links to and from partner sites, information sources and related party websites. Please take note that such third-party website that you will visit by clicking on links have their own privacy policies and we take no responsibility regarding such privacy policies. We recommend familiarising with privacy policies of such websites before providing any personal data to such.

CHILDREN

Our policy is not to knowingly provide Services to or collect personal data and information from persons under 18 years of age. Our Website is not directed or intended for children under this age. If you are under 18 years of age, you should not provide personal data or information on our Website. If you are the parent or guardian of a person under the age of 18 whom you believe has disclosed personal data or information to us, please immediately contact us at info@simetriapay.com so that we may delete and remove such person's data from our system.

CHANGES TO OUR PRIVACY POLICY

As we are constantly developing our services, we may occasionally make changes to this Privacy Policy. Any changes to this notice will be published on the Website and, in case of material changes, we'll provide you with prominent notice as appropriate under the

circumstances, e.g., by displaying a prominent notice within the SimetriaPay Services or by sending you an email and/or a device notification.

HOW TO CONTACT US

Thank you for reading our Privacy Policy. If you still have any queries regarding the collection and use of your personal data, or regarding your rights, please contact us at info@simetriapay.com.