# SATELLITE TEAMS INC. DATA PRIVACY POLICY UPDATED AS OF JUNE 1, 2023

## **ABOUT US**

We, Satellite Teams Inc., are an entity, lawfully organized by virtue and in accordance with the law, engaged in the business of providing back-office support and export-oriented services to various companies, including, but not limited to, customer service, account management, software development relating to I.T.-based business solutions and support services, and in doing all acts and things necessary or incidental for the attainment of the above purposes. In the conduct of the foregoing activities, we act solely as an independent contractor and nothing contained herein shall be construed to create the relationship of principal and agent, employer and employee, parent and subsidiary, or joint venture.

# **PREFACE**

This Privacy Policy presents and specifies the kind and nature of information that we collect, how we use it, and the consequential rights that you may exercise when you visit, use, and submit your personal information through our mobile application / platform. To provide a more defined outline, this Privacy Policy shall set forth the following considerations for your perusal and understanding, to wit:

- What Personal Information We Collect
- How Do We Use Your Personal Information
- How Long We Will Use Your Personal Information
- How We Share Your Personal Information
- Your Data Protection Rights
- Cookies and Site Tracking
- Policy Towards Children
- Changes to this Privacy Policy
- International Transfers
- Security
- Link to Other Sites

We use the personal information that we collect about for us to primarily enable your use and access of our mobile platform, improve and personalize the solutions that we offer, develop and test new products and features based on your experience and profile, manage and enforce contracts that we enter with you and other third-party providers, facilitate and manage feedback that we get from you, identify and report cases of fraud, money laundering, and other cybercrimes, and ascertain compliance with municipal and international legal requirements.

## PERSONAL INFORMATION TO BE COLLECTED

In implementing this Privacy Policy, we commit to receive, store, process, and maintain any of your personal information, whether sensitive or not, in strictest confidence for the object and purpose of data protection and privacy. Considering that we operate globally, we are subject to several data protection regulations employed by various jurisdictions and, as such, we use them as our backbone in maintaining and ensuring your data and privacy regardless of jurisdiction.

Generally, we collect and process the following non-personal and personal information when you visit and use our mobile platform:

- Technical Information refers to the type, version, and name of operating system of the device that you use and the kind of browser, screen resolution, keyboard language, internet connectivity during the time of the visit;
- Behavioral Information refers to the nature of your platform activities at the time of your visit. Normally, the amount of time that you spend while you are using the platform and the portions thereof that you log on to are the things being gauged in this respect;
- Data Analytics refers to the third-party service providers that we engage with to ensure the proper delivery and execution of research, security, and fraud prevention;
- Contact Information refers to your email address, physical address, and telephone or mobile contact details;
- Identifying Information refers to your name, valid government-issued identification cards, profile picture, and birthdate;
- Professional Information refers to your educational background and employment history;
- Social Information refers to your civil status, number of dependents, and age;
- Financial Information refers to your current or previous salary, employment benefits, and availability of bank accounts;
- Emergency Contact refers to the personal details of an alternate person whom you will nominate as the one to call in case of emergency;
- Communication refers to email conversations and other relevant correspondences which you voluntarily share and submit to us to support any of your submissions or representations;
- Consent refers to the agreement or permission you will allow us relative to the collection and processing of your personal information;
- Geolocation Data refers to the internet protocol addresses and other similar information to assess and determine your location for purposes of analytics, advertising, and security maintenance:
- Identifiers refers to the unique identifiers that we gather for statistical and metric purposes.

This Privacy Policy is relevant to the Users of our mobile application / platform, including our visitors, customers, partners, contractors, and employees of the same with whom we do not have any contractual relationship. It is understood that this Privacy Policy may be amended, at any time without need of notice, to ensure our compliance with the relevant laws on the matter. Correlatively, all personal information that you submit must be true, complete, and accurate to the best of your knowledge. If the same needs updating, you must notify us immediately for us to more properly process your information and for you to maintain continuous access to our mobile platform. It is also agreed that you allow us to collect and receive personal information about you from third parties including, but not limited to, your present and / or former employer, insurance providers, and other persons that you have nominated as references for verification purposes. It

is also acknowledged that we may process your personal information by sharing it with third parties, unless, otherwise, precluded by applicable laws.

## **OBJECT AND PURPOSE OF COLLECTING YOUR PERSONAL INFORMATION**

We recognize the legal requirement to maintain the confidentiality of your personal information in the strictest of manners and intend to observe the same throughout the duration of your use of our mobile platform. In this sense, we commit to limit said use for the following purposes only (subject to necessary amendments when called for to comply with the laws):

- to provide our services and process transactions, registrations, purchases, and / or payments;
- to communicate with you regarding our products and services;
- to respond to your queries and act on your requests;
- to analyze performance, improve our services, and fix impending errors in our mobile platform:
- To provide a more personalized experience to you when you use our mobile platform;
- to send promotional, marketing, and advertising messages
- to prevent, detect, and manage potential security threat such as fraudulent and illegal activity on our mobile platform;
- to comply to a legal obligation to collect, use, or process personal information;
- to seek your consent to send you specific communication relative to your use of our mobile platform;
- to resolve disputes;
- to enforce our agreements.

## RETENTION PERIOD OF COLLECTED PERSONAL INFORMATION

Considering that the reason for the necessity to retain the personal information that we collect vary according to the purpose for which the same shall be used, actual retention periods shall likewise vary as a matter of logical consequence. In this regard, we will have to determine the appropriate retention period for each personal information based on the amount, nature, and sensitivity of your personal information processed, the potential risk of harm from unauthorized use or disclosure of the same, and whether we can achieve the purposes of the processing through other means while observing keen compliance with the legal requirements (such as applicable statutes of limitation).

Notwithstanding, we commit to delete your personal information from our database upon the expiration of the generally accepted retention periods while ensuring their integrity. If there is any data that we are unable, due to technical reasons, to delete entirely from our systems, we commit to put in place corresponding measures to prevent any further use of that data. Relative to this, you may contact us for any troubleshooting that is necessary under the circumstance.

## SHARING OF THE PERSONAL INFROMATION COLLECTED

We maintain our utmost commitment in processing the personal information that we gather from you only for the purposes for which you supplied the same to us. In fulfilling this responsibility, we may share your personal information only in accordance with the legal obligation which we are

duty-bound to comply with. In this regard, we may present services, software, and content offered by our third-party providers to ensure seamless experience in using our mobile platform and services. We may also engage the services of third-party providers to perform certain functions on our behalf relative to data analytics. We may likewise share your personal information with third-party providers to determine and employ more viable and effective advertising according to your preference. Legally, we may disclose your personal information when courts of competent jurisdiction issue an order to that effect in connection with an investigation and prevention of fraud and security issues. Similarly, we may share your personal information within the group of our companies should a potential merger or acquisition potentially take place in the organization.

In all the foregoing representations, we commit to seeking your consent prior to the actual sharing of your personal information.

# **YOUR DATA PROTECTION RIGHTS**

In accordance with the generally accepted laws on this subject, you are entitled to the following rights to ensure the protection and security of all information that we collect and gather from you, namely:

- To request a direct communication from us whether we store Personal Information about and ask for the specific authority why we are keeping the same;
- To request for a detailed copy of your Personal Information that we hold and validate how we process the same;
- To request for a correction of incorrect and incomplete Personal Information about you that is stored in our system;
- To request for deletion of your Personal Information when the reason for such retention no longer exists;
- To object to and restrict the processing of the Personal Information that we gathered from vou:
- To withdraw your consent in processing or sharing your Personal Information.

Further to the foregoing, you also have the right to institute a complaint with a competent authority for the protection of your Personal Information. Should you find the need to exercise the same, you may contact us for possible intervention. If you feel the need to do otherwise, you may freely do so without our assistance.

#### **COOKIES AND SITE TRACKING**

We use technology to ensure that our systems recognize your device and your browser because we maintain our commitment to provide you with the best service possible and improve your experience as our customer every time that you avail yourself of the same. In this regard, kindly read our **COOKIE NOTICE** which describes how you may opt out from the use of your Personal Information.

## **POLICY TOWARDS CHILDREN**

We neither extend our services to nor entertain children under the age of 18. If you are a minor and wish to avail yourself of our services, you may do so by securing, first, parental consent.

If you are a parent and learned that your minor child secured our services without your knowledge, kindly contact us immediately for our information.

## CHANGES TO THIS PRIVACY POLICY

We reserve the right to update or modify our Privacy Policy at any time to ensure our compliance with relevant laws on data protection. Please review this page periodically before submitting your Personal Information to us for collection and processing.

## **INTERNATIONAL TRANSFERS**

The Personal Information that we collect may be gathered, retained, stored, and processed in your region, in the United States, or in any other country where we offer our services and maintain our facilities. Relative to this, we commit to perform the foregoing with utmost integrity under this Privacy Policy with the keenest intention to comply and observe the requirements of all applicable laws on data protection.

## **SECURITY**

The design of our systems is based on security and privacy. While we strive to maintain the security of your Personal Information in processing them, it should also be considered that no measure is fully secured during online transmission. As such, we call upon you to take the necessary and required steps in protecting your password, limiting the access of your device to exclusive use, and ensuring that login credentials are logged out after every session.

## LINK TO OTHER SITES

Our services may or may not contain a few third-party links leading to other sites which we do not operate and oversee. We seriously invite you to take time in reading and reviewing their Privacy Policy since we do not exercise any form of control over these sites. We deny and assume no responsibility for the content and privacy notices being implemented by these sites or services.

## **ACKNOWLEDGMENT**

By entering and using this mobile platform, you agree, acknowledge, and understand that you have been afforded with ample opportunity to peruse and make yourself aware of the provisions set forth in this Privacy Policy and that you voluntarily, deliberately, and personally, without mental reservation, to submit to us your personal information for processing and retention.

## **CONTACT INFORMATION**

For any of your concerns regarding this Privacy Policy or the handling of your Personal Information, kindly address the same to <a href="mailto:info@satelliteteams.com">info@satelliteteams.com</a> for immediate assistance and handling.