

Privacy Policy

In compliance with the Federal Law on Protection of Personal Data Held by Private Parties and its regulations (the "Law"), Moudus Business Training, S.A. de C.V. ("Moudus") with registered office at Dakota 359, Interior 301, Col. Nápoles Delegation Benito Juárez C.P. 03810, informs through this privacy policy (the "Privacy Policy") that it is responsible for the use and protection of the personal data it collects, in order to avoid damage, loss, destruction, theft, loss, alteration, and unauthorized treatment thereof.

Moudus Business Training, S. A. de C.V. cares about your privacy. We are committed to maintaining your trust by protecting your personal information. This Privacy Policy describes how Moudus collects, uses, and discloses your personal information in connection with the use of our websites ("Website Services"), platform or SaaS ("HDI"), or other service that this Privacy Policy refers to or that is linked to it, as well as offline products, programs, courses and services (collectively, our "Services").

Before using our Services, please read this Policy in its entirety, to help you make informed decisions about your relationship with us.

1. INTRODUCTION

Personal information. "Personal Information" is data that relates to you and can — either on its own or in combination with other information — identify you as an individual. Personal Information does not include data that has been aggregated or made anonymous such that you can no longer be identified using means reasonably available to us.

Our Services. The Services referenced in this Policy include all the services provided by Moudus.

References to "you." In this Policy, "you" means anyone who uses Our Services, websites, and HDI.

Authoritative Version. When the text of this Policy is available in multiple languages, the Spanish version is the authoritative version, except where prohibited by applicable law.

2. INFORMATION WE COLLECT

The Personal Information that we collect and our use of that information depends on your relationship with us and the requirements of applicable law as described below.

We collect information:

- that you provide to us directly;
- that your company, broker, host, parent, or guardian provides to us;
- about your devices and their location, and your use of our Services, through cookies, pixels, web beacons, logs, and other Internet technologies;
- that we obtain from other sources;
- if you opt for it we may also obtain your uploaded picture.

INFORMATION COLLECTED FROM YOU

Moudus requests different types of Personal Information from you, depending on the Services you use and your relationship with us. We may collect the following categories of information, depending on the Services that you use:

- **Contact Information and other Identifiers**, including your name, address, zip code, phone number, email address, and other information that enables us to contact you;
- **Professional and Employment-Related Information**, including your company name, title, role, team, and other information about your profession;
- **Payment Information**, including your credit or debit card details, bank account information, and payment or other information required when you make a purchase;
- **Intellectual property**, including trademarks, logos and other intellectual property that you own.
- **Other personal information**, including related user names and passwords. We will also process personal information included in the content and information that you add to your profile on the HDI, or that of members or other company profiles.

INFORMATION COLLECTED ABOUT YOU

- **Third-Party Sources.** We obtain Personal Information about you from your company, broker, parent or guardian. We also may receive Personal Information about you from publicly and commercially available sources and other third parties as permitted by law. We combine this information with Personal Information or other information that we receive from or about you, where necessary to provide the Services you requested.

- **Mobile Computing.** We provide websites and our HDI online software that are specifically designed to be compatible and used on mobile computing devices. Mobile versions of the Services may require you to log in with an account. In such cases, information about use of each mobile version of the website may be associated with user accounts.

ANONYMOUS, AGGREGATED, AND OTHER INFORMATION

We also collect and/or generate anonymized and aggregated information from your use of the Services. We use anonymized and aggregated information in various ways, including to measure your interest in and use of portions or features of the Services. Anonymized or aggregated information is not Personal Information.

3. USE OF PERSONAL INFORMATION

How we use your Personal Information depends on your relationship with us. In general, we use your Personal Information to:

- provide you with our Services, in order to comply with the contractual obligations to you or your company;
- the information obtained through the website and the HDI is used only internally to improve the quality of our Services;
- contact you about our Services;
- comply with our legal obligations. Among other things, we use your personal information to comply with financial reporting obligations, or court orders, mandates, or subpoenas in accordance with applicable law.

4. LEGAL BASES FOR PROCESSING YOUR PERSONAL INFORMATION

Personal information may be transferred and processed inside and outside the country, by people other than Moudus and exclusively for the purposes indicated in subsection 3 of this Privacy Policy; In this sense, the information can also be shared with Moudus subsidiaries or affiliates, both in Mexico and abroad. In the event that you do not express your opposition for your data to be transferred, it will be understood that you have given your consent for it. Moudus undertakes not to transfer personal data to third parties without their prior consent, except for the exceptions provided for in article 37 of the Law, as well as to carry out this transfer under the terms set forth therein.

The communications of personal information that is made verbally between Moudus and you, will not be considered as a transfer, so in this case no consent will be necessary.

Other situations when personal data may be transferred. There are cases where we transfer your personal information to other parties:

1. to provide any service that you, your company or organization request outside the scope of our Services, or for auditors or consultants, with prior written authorization;
2. to comply with the law or to respond to a legal process or to a request for cooperation by a government entity or to comply with the law;
3. to detect, limit and prevent fraud, or to verify and compel compliance with the policies governing our Services; or
4. to protect our rights, our property and our security; and
5. when required by law.

We share personal information in this way to comply with the legal obligations to which we are subject or to fulfill our legitimate interests to protect our business, including from fraud and legal claims.

Effective Date: November 10, 2018