	Policy- Privacy notice and statement			
	DATE	Code	Version	Page
	10/08/2018	ITM-L-5	1	1 de 4

Dear customers and associates

Mercon B.V. a Dutch private company with limited liability (Commercial Register No. 61741140), together with its affiliates, have always been committed to providing the very best service we can offer to our customers and associates. Please know that your privacy and the security of your Personal Data (as specified in paragraph 2 below) is a very important part of our commitment to you.


As you may be aware, the General Data Protection Regulation (GDPR) has now become law, providing international standards for how we obtain, use and store personal data. As a result, we have updated our Privacy Policy.

To learn more about our Privacy Policy, please click [here](#).

For more information please feel free to contact Felipe Cam, at privacy@merconcorp.com, Office number: +31-20-708-56-30.

Prepared by:
Legal Counsel
 Nicaragua

Approved by:
IT Director
 Nicaragua

	Policy- Privacy notice and statement			
	DATE	Code	Version	Page
	10/08/2018	ITM-L-5	1	2 de 4

For Mercon B.V. and its affiliates (the “Company”), it is indispensable for our customers and associates to feel comfortable sharing their information with us. In this Privacy Policy we will explain how we collect and use your personal data (as specified in paragraph 2) and the practices we follow to ensure the protection of your personal data. Below you will find an overview of the topics that will be discussed in this Privacy Policy. By clicking on a topic, you will be automatically directed to that topic.

1. Applicability
2. What kind of data will be processed and why?
3. Retention
4. Security
5. Disclosure and transfer of personal data
6. Your rights
7. Changes of this Privacy Policy
8. Questions

1. Applicability

This Privacy Policy is applicable to all personal data (as specified in paragraph 2 below) that is being collected and processed by the Company.

2. What kind of data will be processed and why?

The Company collects personal which consists of:


- Name, address, telephone number, website, instant messaging contact information such as Skype address of the client and its representative;
- Bank information (such as bank name, SWIFT, ABA, account number, IBAN number and beneficiary name), and payment terms and credit information of the Client;
- and
- Other information may be requested and/or provided as well in the course of providing you with our goods and services.

The Company may collect this information through forms, interviews and transaction history. .

The Company and its representatives use this personal data for the following purposes:

- Internal purposes for the providing you with its goods and/or services, this may include: communication in order to obtain consent in order to provide services; delivery of goods; invoicing; Payments or refunds; tax purposes. And also, to apply credit and risk policies; for market share review; and analysis of portfolio.
- Transaction history and payment history of the client;

Prepared by: Legal Counsel Nicaragua	Approved by: IT Director Nicaragua
---	---

	Policy- Privacy notice and statement			
	DATE	Code	Version	Page
	10/08/2018	ITM-L-5	1	3 de 4

In the normal course of business, Company representatives will provide or may be required to provide data (personal data) to third party service providers, that we use to run our business (such as, customs agency, transportation companies, payment and accounting processing and other internal support departments, public authorities (i.e. tax authorities)), in each such case access and use is limited to specific task that they have been requested to carry out.

If you have submitted questions and/or comments or requested (other) goods or services by e-mail or any other way, the Company may use your personal data to contact you for the purpose of responding to those questions and/or comments and providing those goods or services.

The Company processes your personal data therefore on the basis of:

- the legitimate interest of the Company in order to provide you and/or your company with its goods and services; and
- the legitimate interest of the Company in order to contact you and to keep in contact with you.

3. Retention

The Company may retain data only when required in order to provide the services agreed upon or to comply with legal obligations, unless the Company is subject to legal retention obligations.

The Company is subject to several legal retention obligations, for example (but not limited to) legal retention obligations based on tax law and on the Civil Code. .

The Company will continue to adhere to its privacy policies and practices with respect to information about former customers who have closed their accounts and/or have not asked us to eliminate their information within the Company.


4. Security

The Company maintains strict physical, electronic and procedural safeguards designed to protect the personal data of our customers and associates against any loss or any form of unlawful use. Those persons who, on behalf of the Company, have access to your personal data, have a confidentiality obligation.

5. Disclosure and transfer of personal data

Please note we do not provide, sell or make available our customers' personal data, or other non-public information, to any third parties, outside firms, organizations or individuals, except as necessary to render the agreed service or as permitted by law, such as: IT suppliers, legal and financial advisors, tax authorities etc.. The Company requires service providers to maintain privacy policies and procedures designed to assure that access to non-public information about customers is restricted to employees who need the information in order to provide the products and/or

Prepared by: Legal Counsel Nicaragua	Approved by: IT Director Nicaragua
---	---

	Policy- Privacy notice and statement			
	DATE	Code	Version	Page
	10/08/2018	ITM-L-5	1	4 de 4

services to our customers, and that the use of such information is limited to the purposes for which it was disclosed or as otherwise permitted by law.

6. Your rights

Please remember you may have the right to access, rectify and erase your personal data the right to data portability of your personal data and the right to be informed about how we use your personal data. You also may the right to object against or restrict the processing of your personal data, as well as block, or withdraw your consent from, any further use of your personal data. You also may the right to stop unauthorized transfers of your personal data to a third party and, in some cases, to have personal data relating to you transferred to another organization. Furthermore, you have the right to lodge a complaint about the way we handle your personal data with your national data protection authority. Please note, if you do not provide the personal data necessary or withdraw your consent from the use of your personal data, we may not be able to provide the requested goods or services.

If you wish to make use of these rights or have any questions or requests on this Privacy Policy, please contact Felipe Cam, Office: 786-254-2300. fcam@merconcorp.com.

Information provided to you shall be initially free of charge. You can exercise these rights at reasonable intervals.

With regard to a request to erase personal data, it should be taken into account that the Company call not comply with such request, if it is incompatible with any legal retention obligations of the Company.

If a request is allowed, the Company shall execute the decision correct, amend, erase and/or transport the personal data as soon as possible.

7. Changes of the Privacy Policy

The Company may change this Privacy Policy as needed. If changes to this Privacy Policy are made, please note that it may take up to a reasonable amount of business days before new privacy practices are implemented. The Company will inform you on any changes to the Privacy Policy.

8. Questions

If you have a question or a complaint on (the execution of) this Privacy Policy, please contact Felipe Cam at privacy@merconcorp.com, Office: +31-20-708-56-30.

Mercon B.V.

Prepared by: Legal Counsel Nicaragua	Approved by: IT Director Nicaragua
---	---