



## PARTNERSHIP

# NOTICE OF PRIVACY

Effective Date January 1, 2021

This privacy notice is part of the use of the website <https://abcdigitalagency.us/partnership/> and will be available at all times. ABCW Group, as well as its associated companies and subsidiaries, reserves the right to make any change, adjustment or modification to this privacy policy, which will be made known to you through the procedures described below.

For the purposes of this privacy notice, Cubos Web, S.A. de C.V., Dillon Corp, S.A. de C.V., ABC Cubos Strategias Digitales, S.A. de C.V. as well as ABCW LLC and its associated companies and subsidiaries, hereinafter "ABCW GROUP", is responsible for the use and protection of your Personal Data, as creators of the ABCW PARTNERSHIP program, a program for Digital Agencies and clients in Latin America through which to be rewards investment and participation in digital media

ABCW GROUP is located in Jaime Balmes 11, tower A, floor 1, Polanco first section, Delegación Miguel Hidalgo, C.P. 11510, Mexico City.

This Privacy Notice contains all the requirements and guidelines provided by law for the treatment of your Personal Data, since we understand that your privacy is important for you and therefore for ABCW GROUP.

Therefore, and in compliance with the Federal Law on Protection of Personal Data Held by Private Parties, published in the Official Gazette of the Federation on July 5, 2010 and its Regulations published in the Official Gazette of the Federation on July 21 December 2011, we establish the following conditions and practices that any user of the website accepts when visiting it

### **Use of personal data**

The information collected by the ABCW PARTNERSHIP digital platform is for the purposes of:

- The effective identification, as well as the certainty of the identity of the user of the Website.
- The logistics, operation, management, billing, collection, administration and everything that derives from the provision of our services.
- Any type of notification, requirements, letters, newsletters, promotions, new products and / or services, information from our partners or affiliates, as well as the attention to requests related to our services or any other related.
- Complement, adjust or modify any transaction, request or similar that has been made on the ABCW PARTNERSHIP website.
- Possible analysis of behavior, tastes or demographics of our users.
- Improvement of our commercial and marketing models.
- The presentation of advertising or promotions in any of its forms that may be of interest to our users.



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- Transfer of information from the Holder in the applicable cases in accordance with the section "Transfer of Information with Third Parties" of this Notice.
- Prevention or reporting to different authorities of illegal acts or acts.
- To comply with the exercise of ARCO rights as well as revoke the consent of the Holder.

All of this is done so that you have full control and decision over your Personal Data. With which we recommend that you read the following information carefully.

### Personal information

ABCW GROUP will collect the Personal Data that are necessary to correctly process the application or effective entry to our ABCW PARTNERSHIP program in our digital platform or domains (i) directly or indirectly (ii) through its agents, promoters, commission agents or partners commercial. The data we request are the following:

\*Identification data:

1. Full name or company name
2. Address or domicile
3. Telephone or contact number
4. Email address

It is the responsibility of the owner of the Personal Data or the person authorized to do so, to guarantee that the data voluntarily provided to ABCW GROUP are correct, truthful and complete, being responsible for communicating any changes to them in order to comply with the obligation to keep information up to date.

In the event of not having the personal data of the owner, or not having them updated, ABCW GROUP would not be able to carry out the services it provides, with which it would not have any type of responsibility derived from it.

Likewise, the Personal Data provided by the owner or the authorized person, incompletely, erroneously, or that have not been viable for which they were required, may be eliminated and will not be kept in any database.

However, and despite having more secure tools every day, the protection of data sent over the Internet cannot be guaranteed 100%; so once received, every effort will be made to safeguard the information.

THE DATA MAY BE COLLECTED THROUGH COOKIES, WEB BACONS OR SIMILAR





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ABCW GROUP, will use cookies only for statistical purposes to improve business strategies.

Use of the information collected and transfer of data with third parties

ABCW GROUP will use the information collected from users to process your request, answer questions or comments, and any other that is assimilated, as well as comply with the obligations contracted with our Partners and report on changes to our products or services.

ABCW GROUP may transfer Personal Data to third parties for the following purposes:

- Those in charge of monitoring traffic, identifying user groups and profiles, and targeting advertising.
- To our subsidiaries or associated companies for the proper functioning of the Partnership
- In the event that ABCW GROUP undergoes a merger, purchase or substantial change in corporate control, it is possible that the information collected on the website may be transferred.

Limitation of use and disclosure of information - ARCO Rights

Means to Exercise ARCO Rights (access, rectification, cancellation and opposition) In accordance with the Federal Law on Protection of Personal Data in Possession of Private Parties and its Regulations, the owner of the Personal Data, by himself or through a legal representative, must identify himself or properly accredited, you can exercise your rights of access, rectification, cancellation and opposition ("ARCO Rights"), clearly and precisely describing the Personal Data with respect to which you seek to exercise any of the ARCO Rights, which are the following :

1. Access.- You may request at any time to know what data of yours has been collected and that is kept by the person in charge, as well as information regarding the conditions and generalities of the treatment
2. Rectification.- In the event that any of your data is inaccurate or incomplete, you may request its correction, indicating what data it is, and you must attach the documentation that accredits or supports said modification.
3. Cancellation.- The cancellation of the data may be requested at any time; If the request is appropriate, a blocking period will begin in which your Personal Data may not be processed in any way for subsequent deletion.
4. Opposition.- At any time, the owner may oppose the processing of his Personal Data for legitimate reasons or request that said treatment cease.



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WE PUT AT YOUR DISPOSAL THE FOLLOWING EMAIL TO EXERCISE YOUR ARCO RIGHTS -----  
contact@abcw.us

In addition to your request, you must provide the arguments for which you wish to exercise any of your rights, along with a copy of your official identification or that of the owner of the data or their attorney-in-fact, your request will be answered within a period no longer than 30 business days.

Likewise, at any time you can revoke your consent to the processing of your data, by the same means indicated above.

### **Changes to the Privacy Notice**

ABCW GROUP reserves the right to make changes or updates to this Privacy Notice at any time, in response to new legislation, internal policies or new requirements for the provision or offering of our products or services.

### **Terms and conditions of the Partnership**

ABCW GROUP reserves the right of admission of Partners, as well as their permanence, being able to terminate the commercial relationship by giving notice at least 15 days in advance without prejudice to ABCW GROUP.

The bonus is accumulated for one billing year, after this, the Partner will have the subsequent year to apply his effective bonus.

The bonus does not accumulate for years, the maximum period for this is 12 months from the issuance of the first invoice.

### **Jurisdiction:**

Any conflict arising from this Privacy Notice is subject to the applicable laws of the United Mexican States and the address is set, for all legal purposes, in Mexico City, Mexico, submitting to the jurisdiction of its courts.

LAST UPDATE: January 27 2021