

POSADAS & VECINO CONSULTORES INTERNACIONALES is strongly committed to ensuring the privacy of users of its services and to be transparent in the use and processing of their personal data and any information that may be obtained in so doing or by the use of its website, the subscription to its newsletter or enrollments to events, fairs or like activities.

In this regard, this document is intended to inform about our policies in this matter, last updated on May 25, 2018, indicating specifically how and to what extent users' data are handled. All interested parties are recommended to read this document carefully, should they wish at any time to request more information on the use of their data, request the introduction of changes as to how they are processed or exercise rights, which—where applicable according to regulations in force—will be implemented within a reasonable period of time.

I. PERSONAL DATA COLLECTION AND USE. Personal information collected within the framework of advisory services is used for purposes of complying with legal, accounting or notarial tasks required as well as complying with the obligations and duties set forth in the applicable legal system. This information is covered by the protection granted by professional secrecy and is treated with utmost confidentiality, including the signing of confidentiality agreements between the Firm and its staff—whether professional or not—relative to client information available as a result of the performance of tasks for the Firm.

Some contact data, such as postal address, e-mail address or telephone number, among others, collected as a result of an advisory relationship or the abovementioned mechanisms, may be used for the following purposes, with a focus on providing more comprehensive professional services in a proactive manner and for the benefit of users: institutional communications, newsletters, invitations, reminders or acknowledgments for attending events, delivery of legal or accounting information, dissemination of publications, reports, journals or books, service assessment surveys, invitations to candidates to attend interviews in order to provide services or work for the Firm and, from time to time, updating of clients' contact data for the abovementioned purposes.

As the sole exception, relative to disclosing or transferring information not required by competent authorities, Posadas, Posadas & Vecino will eventually use contact data to communicate with users of national and international professional service assessment publications. Under no circumstances will the Firm sell any personal data it has obtained.

With regard to data belonging to the Firm's staff, they will be used exclusively within the framework of administration of the relevant service or labor relationship, in accordance with internal human resources policies.

If necessary, data processing, whether carried out directly by Posadas & Vecino Consultores Internacionales or by an agent responsible for data processing, will at all times comply with this Data Use and Privacy Policy.

II. CONSENT. Consent for the use of data will be obtained as provided hereunder, except in the following cases: (a) where certain use or disclosure of data is necessary to comply with an obligation or duty provided by positive law; (b) where certain use or disclosure of data is necessary to provide the services offered by the Firm; (c) where certain use or disclosure of information is necessary to exercise any rights or claims; or (d) where there is a legitimate interest in continuing with certain data use or processing.

Users who wish to withdraw their consent to the use of data or who wish such data to be handled other-wise than as described hereunder should send an email to such effects to the following email address: unidadclientes@pvci.com.uy.

Such requests will be fulfilled always provided use of such data is not necessary or required by the Firm to comply with applicable regulations.

III. RIGHTS OF ACCESS TO INFORMATION, AMENDMENT, UPDATE, DELETION, OBJECTION, PORTABILITY AND RESTRICTIONS ON THE PROCESSING OF PERSONAL DATA. In addition to informing its clients on the purposes for which their data are used, pursuant to the provisions of this document, Posadas & Vecino Consultores Internacionales will—to the extent possible, according to the applicable positive law—grant access to and, upon request, inform interested parties on the data it has available and their specific use, and will carry out, where applicable, all requested amendments, updates, deletions and restrictions on the processing of such data.

Interested parties' rights to the portability of data will also be observed upon receipt of the relevant request from the holder of such right, in which case the Firm will provide such parties with a document containing all the data it has available, in order that they can be used by other service providers.

The interested party shall be required to send an email to the following email address: unidadclientes@pvci.com.uy in order to be able to exercise any of the aforementioned rights. Posadas & Vecino Consultores Internacionales will analyze such request and will fulfill it always provided, according to applicable regulations, use of such data is not necessary or justified for purposes other than and excluding what is being requested. The development of the aforementioned analysis and, if applicable, the implementation of the necessary measures to grant such rights will be carried out within a reasonable period of time, generally within 30 days from the date such request is received. In any case, a response will be issued and will be sent to the e-mail address of the sender of the request received providing an explanation of and justification for the resolution adopted and the action taken.

Likewise, users of the services provided by the Firm may also, at any time, object to such use and request that the Firm cease to use their data to send information on services, news, newsletters, publications and events by sending this request to the e-mail address mentioned in the preceding paragraph.

IV. DATA PROTECTION AND SECURITY MEASURES. Posadas & Vecino Consultores Internacionales is especially committed to keeping under strict confidentiality all data of users of services provided by the Firm. To such effect, the Firm has adopted appropriate data processing measures, systems and procedures to ensure the privacy and protection of the information it handles.

V. CLAIMS. Any claim or complaint by the user regarding the Firm's legitimate use and protection of information, may be channeled through the following email address: unidadclientes@ppv.com.uy, and will be given consideration within a reasonable period of time, generally within 30 days of receiving the relevant request. If applicable, the relevant compliance and correction actions will be taken and informed to the user and, should such request be rejected, the Firm will give well-grounded reasons therefor.

VI. AMENDMENTS TO THIS PERSONAL DATA USE AND PRIVACY POLICY. The amendments to these personal data use and privacy policies will be published on the Firm's website and users may, any time, access updated versions of same, which will be deemed accepted if the webpage continues to be read, if a new subscription to events or delivery of information is requested or if professional or information services provided by the Firm are requested.