



POLÍTICA PARA EL TRATAMIENTO DE DATOS PERSONALES CUCÚ LLC

CUCÚ LLC with EIN 85-2944039, developed an innovative digital platform that connects people and companies through the art of simultaneous interpretation. Offering you the availability and a variety of languages, specialties and professionals. CUCÚ LLC provides the digital platform that allows freelance translators and interpreters to offer their services and the customers to choose the right freelancer for the job. Also provides information and guidance about the translations and interpretations industry.

CUCÚ is based on the concept of connecting cultures and communities in a timely manner, available at every moment and everywhere. CUCÚ is like the Cuckoo Bird that is a migratory bird and has the capability of flying beyond borders and being present in many places of planet earth. Our method provides the Users the transparency and the flexibility to take down language barriers for doing business, education and personal affairs. Is an ideal tool that provides on-site and remote services, we have the resources that are needed to connect and communicate. Time is a scarce resource and it is for this reason that we help people to streamline their efforts to facilitate the communication.

For CUCÚ LLC is important to protect your privacy. We do everything that is possible to keep your personal information confidential. By keeping you informed and having you understand the Privacy Policy for CUCÚ customers, we can provide a better service. Spend a few moments reading the following policy to be informed about how we manage your personal information.

In the document hereto we state the personal data treatment policy.



DEFINITIONS

The expressions contained in the DEFINITIONS item of the Terms and Conditions are also used for this Privacy Policy with the same meaning. Every time they are used in the following Personal Data Treatment Policy, will have the meaning within the legislation in effect, namely:

Registration Data: The data that is required for registration in CUCÚ are: Name, Last Name, Parentage (in the case that the service requires the participation of minors or people that need representation), address (including the e-mail address), email address and occupation.

Personal Data: All of the data that can be directly or indirectly used to identify a person, for instance: name, pictures, email, banking information, medical



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information, geolocation, phone numbers, messages in social media, IP address, etc.

Processing of Personal Data: any operation that contains Personal Data, such as those related to collection, production, reception, classification, use, access, reproduction, transmission, distribution, processing, archive, storage, elimination, assessment or control, modification, communication, transfer, dissemination or extraction of the information.

Digital: CUCÚ is a digital solution that connects professionals of the translation and interpretation industry to customers.

Global: We feel encouraged to have a presence anywhere in the world. Our solution is open to any professional User in any country.

Flexible: We know that each service is different, and for that very reason, we have compiled a wide diversity of services and options to meet the needs of everyone.

innovative: We are passionate to continue devising products and services that benefit our clients and Users around the world.



Why do we collect personal information?

CUCÚ gathers and uses your personal information to offer you services when customers require freelance translators and interpreters and the customers can choose the right freelancer for the job. Also offers information and guidance about the translation and interpretation industry.

CUCÚ, also supports the customers with information and guidance regarding the translation and interpretation industry.

We will use the information to create a User profile and password that will grant you access to the platform, to offer your translation and interpretations services, as well as to request the service of any of the freelancers that are registered in the platform. The information submitted will serve to create the reminders and information of interest about the services contracted, and will generate value and generate greater value and a better customer experience.

It is important to highlight that it is imperative for CUCÚ to collect, store and process the personal data obtained from the Users, so to enable the service provision through the Platform.



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Hence, it is important for you to acknowledge and accept purposefully and unequivocally, that CUCÚ collects, receives, and stores your Personal Data and information in an automated fashion in the servers regarding the activities that turn out from the browser of the Users, which includes the geolocation, the IP addresses, the cookies and other sequence of identifiers, as well as the information of the transactions carried out through the platform.

It is important to highlight that the personal data is necessarily gathered by CUCÚ so to enable the execution of the service contract signed with the Users, as well as the legitimate interest to allow the operation of the platform.

Also, it is worthy to underline that to use the tools offered by CUCÚ, you must register and, therefore, provide your full name, date of birth, Id Number, phone number, address and email address, as well as creating an access password that will be only known by you.

You are aware that it is your sole responsibility to provide truthful, accurate, updated, and complete information when registering to have access to the Platform. We remind you that providing false or incomplete information is a crime classified by law and can turn in to a severe sentence.

We do not submit or sell your name, email address, information of your domicile nor any other personal information to any third parties with commercial purposes and will only disclose said information when required by law. We do everything possible to protect your data against the illicit dissemination to third parties over the internet. We commit to protect your information and the data security, with the highest security standards currently developed.



How shall the Users control their registration data?

Every User has control of the Registration Data within the profile created in CUCÚ and can access them and modify them through the Username and password. We remind you that the Username and password are individual and known only by the User, who must strive to keep the confidentiality of said data. CUCÚ is not responsible for how the data is used by the User. The Users can update their information in CUCÚ through the platform.

Accounts Registration and Security



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The Users of the CUCÚ platform, must provide their names and real data and for it to be fully met it is necessary that it continues to be so. At the moment of registering you accept the following commitments regarding the information provided and the security of the account:

- a. The personal information and the information of your products that is provided in the CUCÚ platform must be real.
- b. You will not create an account for another person without authorization.
- c. In the CUCÚ platform you can only have one account or personal profile.
- d. If your account or profile is disabled by the admins of the platform, you cannot create a new one without authorization.
- e. The CUCÚ platform can only be used by people of legal age.
- f. The contact information that you provide in the CUCÚ platform must remain accurate and updated.
- g. The password and access to your profile in the platform, is secret, personal and shall not be provided to anyone else.
- h. The access to your profile in the CUCÚ platform is personal, you will not take any actions that put the security of your account or profile in danger.
- i. The accounts and profiles that are created in the platform, are not transferable, without the prior authorization in writing by the admins of the platform.
- j. The platform admins, will eliminate the accounts or profiles that are created with similar names or with erroneous or false information, notwithstanding the legal actions that can be instilled.



Collection and use of personal data and information gathered?

The Personal Data and Registration Data collected, as well as any other information collected, can be used so that our team can get in contact with you, to notify you about activities related to the tools in CUCÚ, as well as system alerts and notifications.

Additionally, the Personal and Registration Data collected, as well as any other information and access registration tools in CUCÚ, can be stored, treated processed and used by us for the following purposes:



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- Enable the services offered by CUCÚ in an effective and efficient way, allowing the operations to flow quickly and safely.
- Aid, whenever is needed and appropriate, so that the Users can communicate, especially in the cases of possible conflict deriving from the quality of the content, about delays of delivery of the content, Copyrights and Intellectual Property;
- To carry out analysis and studies related to the behavior, the interests and the demographic data of the Users, so to understand their needs and demands and being able to provide better, efficacious and interesting services, enhancing the usability experience of the CUCÚ tools;
- Improving our commercial and marketing strategies with the objective of improving the services offered;
- Sending messages to the Users with information about products, services, advertisement, promotions, banners and CUCÚ news.

User's rights and personal data

The Users have the right to receive clear and complete information as long as it is formally requested, about personal information eventually collected and/or processed by CUCÚ.

Also, the Users can always get in contact with CUCÚ to exercise their rights of exclusion, correction, rectification and restriction of use in terms of their personal data.

The Users can also exercise their rights and file claims before the authorities of data protection to act within their jurisdiction.

For the exercise of any of their linked rights to the personal data eventually collected and processed by CUCÚ, as well as sending any concerns or doubts regarding the matter, the Users must contact CUCÚ through the email info@cucu.us.

The Users whose personal information has been collected and processed based on the consent, can withdraw it at any moment, and that will not affect the legality of the collection and processing carried out by CUCÚ during that period. The personal data obtained based upon CUCÚ's legitimate interest can subject to challenge through the email info@cucu.us.

In the case that the User withdraws consent and requests the exclusion of data whenever it is collected and process based on the legitimate interest and need to enforce a contract, recognizes and accepts, starting now, that



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CUCÚ will not be held responsible for any loss or damage caused to their personal data if the User decides to withdraw consent.

We highlight that some personal data collected must, by legal obligations imposed to CUCÚ by the competent authorities, be kept in our archives for a minimum legally defined term, in spite of the User requesting its exclusion and/or modification. As a way of illustration, Data linked to fiscal documents, Financial transactions, tax identity, Full name and other needed to identify a specific financial operation, tax operation or fiscal operation will be kept by CUCÚ even though the exclusion has been requested.

It is important to reiterate that it is imperative for CUCÚ to collect, store and process personal data obtained from the Users, to enable the services offered through its platform.

Nonetheless, we guarantee to our Users that we will apply our best efforts to maintain all the personal data collected duly secure, protected and confidential, in spite of the fact that is not viable, technically to guarantee the inviolability of the data in the case of any future external attacks and system failures.

In said cases, we commit to reporting to the Users what has happened and what was the data that was breached, within the principle of transparency and trust that shall rule the relationship between CUCÚ and its Users.



How do we protect your personal information?

CUCÚ protects the security of data that is submitted through physical, electronic and administrative procedures. We recommend you take all the possible precautions to protect your personal data while searching or browsing the Internet. Change your passwords often, use a combination of letters and numbers, and try using a safe browser.

CUCÚ uses Secure Sockets Layer encryption (SSL), industry-standard, in all the different webpages where personal information is requested. To request online orders from CUCÚ, you must use a browser that is compatible with SSL. This will protect the confidentiality of your personal information and credit card information or payment information that is provided while using the Internet.



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Regarding the personal information treatment, CUCÚ LLC commits to observe and respect the following principles:

- Principle of legality in data treatment matters: the treatment of personal data will be ruled by the applicable legislation for that matter.
- Principle of purpose: the treatment of personal data obeys to a legitimate purpose, in accordance to the constitution and the law, which is duly reported to the holders through the hereto policy.
- Principle of freedom: CUCÚ LLC can only do the treatment with the prior, and Informed, and specific consent from the holders. The personal data cannot be obtained nor disseminated without prior authorization, in absence of a legal or judicial mandate that reveals the consent.
- Principle of truthfulness or quality: the information subject to treatment must be truthful, complete, accurate, updated, comparable and understandable.
- Principle of transparency: CUCÚ LLC, guarantees the holder the right to obtain information about the existence of data that concerns them.
- Principle of restricted access and circulation: the treatment is subject to the limits that derive from the nature of personal data, the provisions within the law and the Constitution. To that extent, treatment can only be carried out by people authorized by the holder and/or by the people defined in the applicable legislation.
- Principle of security: the information subject to treatment must be managed with the proper technical, human and administrative measures that are necessary in order to provide security to the records avoiding the tampering, loss, inquiry, use of unauthorized or fraudulent access.
- Principles of confidentiality and eventual treatment: every personal data that is not public data must be treated confidentially, even when the contract relationship or the link between the personal data holder and the company has ended.
- Principle of temporality: the entity will not use the holder's information further beyond the reasonable terms that is required by the purpose for which it was informed to the holder.
- Principle of necessity: the personal data can only be treated during the time to the extent that the purpose of the treatment is justified.





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CUCÚ IS a platform that in the strict application of the security principle, will provide technical measures, human measures, administrative measures that are necessary in order to provide security to the records, avoiding the tampering, loss, inquiry, use of unauthorized or fraudulent access.

Likewise, will demand from all of the different service vendors that are hired, to adopt and comply with the technical, human and administrative measures adequate for the protection of the personal data.

Despite of the aforementioned, CUCÚ provides high security standards, but cannot guarantee to 100%; and we will always need your help, therefore, the following digital behaviors are forbidden:

- a. Publishing commercial information that is not authorized in the platform.
- b. Collecting information or content from other Users of the platform.
- c. Accessing the CUCÚ platform or software using automated means, such as: robots, recollection bots, spiders for scrapers.
- d. Participating in illegal multilevel marketing in the platform to harvest their future.
- e. Uploading virus nor malicious code of any sort.
- f. Requesting information nor accessing the Account of another User.
- g. Publishing content that entices hatred, that intimidatory, pornographic, entices violence, overall, not publishing any content with nudes or violence.
- h. Develop nor operating applications of third parties that include content related to alcohol consumption without the proper age restrictions established by laws in the State of Delaware.
- i. Using the CUCÚ platform for illicit, deceitful, ill intended or discriminatory actions.
- j. Carrying out any action that can disable, overload or affect the proper functioning of the platform.
- k. Carrying out actions that change the aspect of the platform, such as attack of service denial or the tampering of the presentation of its pages or other features.
- l. Facilitate nor foster the noncompliance of this document or the policy of personal data of treatment.
- m. Publishing information of content or false advertisement of your products or third parties.
- n. Offering your personal product or a third party's product without meeting the requirements of the platform.



What is the personal data treatment and purpose?

CUCÚ LLC, in the course of its commercial activities will collect, use, manage, store, analyze, anonymize, index, segment, profile, broadcast, transfer and carryout the different operations with the personal data. The Personal data processed by CUCÚ LLC must be subject only to the purposes that are stated or the ones that are accepted by the holders at the moment of collecting the personal data. Likewise, those in charge of third parties that half access to the personal data provided by the law, contract or any other binding document, will carry out the treatment in order to achieve the following purposes:

For Customers: (A) the creation of a personal account in CUCÚ LLC's website, (B) the processing of online orders or requests, (C) the submittal of promotional messages, catalogs and bulletins, (D) contacting the customer in case of any situation with their service, (E) the notification to the winners of online promotions, (F) the management of the account of CUCÚ LLC, (G) carrying out promotions and digital marketing specifically to customers, (J) protecting the rights of CUCÚ LCC pursuant of the legal provisions, (K) fulfilling transactions, obtaining invoicing data and issuing invoices, (I) carrying out statistical analysis of the data collected in order to optimize the functioning of the service provided, (M) customizing the webpage and/or applications for mobile phones according to the likes and interests of the holders and (N) sharing the information through social media and Internet webpages.

For employees: (A) the management of the human resources of CUCÚ LLC, including, but not limited to, the assessment of the candidates to be employed by CUCÚ LLC, the work relationship to CUCÚ LLC, training processes, performance assessments, carrying out wellness and occupational health programs, issuance of work to certificates, (B) management of curriculum tanks and recruitment campaigns to hire staff.

For vendors and contractors: (A) meeting all the internal processes of CUCÚ LLC around management of vendors and contractors.

For interpreters and translators: (A) to validate the availability for the proper service provision of the contracted service, (B) for the efficient and effective service provision.



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General (A) handling of the necessary information for the compliance of the obligations, taxes and commercial, corporate and accounting records of CUCÚ LLC and its customers, (B) the archive process, systems for updates, information protection and custody as well as databases, (C) Carrying out personal data update campaigns to guarantee the integrity of the data, (D) carrying out internal investigations pursuant to the various policies of the company in case any suspicious activities that might affect the goodwill of CUCÚ LLC, (E) submitting modifications to this policy, as well as requesting new authorizations for personal data treatment, (F) disclosing personal data to third parties with whom contracts have been held for that purpose or documents have been undersigned, such as addendums or representations, that allow to disclose personal data, for commercial, administrative and/or comparative purposes, (G) to comply with the purposes aforementioned, to convey, conveying, transferring, sharing, delivering, and/or disclosing personal data to third parties, inside and out of the national territory, including countries that do not provide adequate levels of personal data protection.

The treatment that will be carried out by CUCÚ LLC, with the personal information will be the following:

- The development of the corporate purpose of the software and the website operator.
- Carrying out the registration of Users of the website.
- Monitoring and managing the commercial and contractual relationship developed with the Users.
- Carrying out all of the activities needed in order to provide proper services or products offered in the web platform.
- Analyzing the preferences and behaviors of the Users.
- Streamlining and customizing the Users browsing experience.
- Contacting the Users and managing requests, processes, claims or complaints.
- Keeping historical records.
- Sending promotional or commercial information of CUCÚ LLC.
- Informing the Users about events or agreements that are for their benefit.
- Implementing commercial strategies adapted to the different types of Users.
- Managing resources and developing projects for the benefit of the Users.



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CUCU **Scope**

This policy applies to all of the personal information registered in the databases of CUCÚ LLC, that acts as responsible for the treatment of personal data.



CUCU **Validity**

They hereby Personal Data Treatment Policy is of mandatory and strict compliance for CUCÚ LLC and it is in effect starting October 10, 2020.

The personal data provided will be kept as long as there is a contractual relationship with the holder of the information; the data provided will be kept as long as its suppression is not requested by the stakeholder, as long as there is no legal duty to preserve it.

The personal data that is stored, used or conveyed will remain in CUCÚ LLC databases, based on the criteria of temporality, during the time that is needed in order to meet the purposes mentioned in this policy, for which they were collected. In turn, the validity of the database is directly related to the purposes for which the personal data was collected



CUCU **Modifications**

This policy can be modified from time to time by CUCÚ LLC and will be part of the contracts held by CUCÚ LLC, wherever pertinent. Every substantial modification to this policy will have to be reported ahead of time to the holders through the efficient mechanisms, such as CUCÚ LLC website and/or emails. If it's required by the applicable law, will also seek to get the authorization of the account holders. It is understood as substantial modifications, amongst others, those related to the enforcement of the rights of the account holders and with the purposes of personal data treatment whenever that can affect the authorization.