



POLÍTICA DE PRIVACIDAD

Effective September 1,2020

WE ASSIST respects the privacy of its subscribers and visitors to www.weassistgroup.com . For this reason, **WE ASSIST** would like users to know how it uses any personal information that users provide when using www.weassistgroup.com.

TABLE OF CONTENTS

1. PURPOSE AND WHO WE ARE	2
2. WHAT INFORMATION ITS COVERED UNDER THIS POLITICS	2
3. WHAT PERSONAL INFORMATION DO WE COLLECT:	3
4. WHAT INFORMATION DO YOU PROVIDE US:	4
5. WHAT INFORMATION DO WE AUTOMATICALLY COLLECT:	4
6. WHAT INFORMATION DO WE RECEIVE FROM THIRD PARTIES:	5
8. DISCLOSURE OF PERSONAL INFORMATION.....	8
9. COOKIES	9
10. THIRD PARTY LINKS	11
11. RIGHTS OF THE USER	11
12. CONFIDENTIALITY AND SECURITY OF THE SITE AND YOUR PERSONAL IDENTIFICATION INFORMATION	12
13. LEGAL BASE FOR DATA PROCESSING	13
14. INTERNATIONAL PRIVACY PRACTICES	14
15. CHANGES TO OUR PRIVACY POLICY.....	14
16. PREGUNTAS Y COMUNICACIONES ADICIONALES	14



1. PURPOSE AND WHO WE ARE

We Assist is a company dedicated to the development, operation and commercialization of various assistance products, as well as the operation of a telemedicine platform. We Assist does this through a vertically integrated operation with different actors responsible for providing the highest level of care and resolution of circumstances.

The purpose of this Privacy Notice is to describe how **WE ASSIST** collects, uses and shares information about you through our online interfaces (eg, websites and mobile applications) owned and controlled by us. We ask that you read these privacy policies carefully to understand what we do and how we do it. This Privacy Policy also applies to the use of our Platform through a mobile device, whether through mobile applications or mobile-optimized websites. For details on the personal information we collect when you use or interact with other **WE ASSIST** services, please see the Privacy Policy for those services or contact us at legal@weassistgroup.com. Your use of our online interfaces is also governed by our Terms of Use.

WE ASSIST CORP., Is a corporation established in the Republic of Panama with its main place of business at Torre Towerbank, Piso 17 Suite A, Calle 50, Panama. If you reside or are located in the European Economic Area ("EEA") **WE ASSIST CORP.** Is the data controller of all personally identifiable information (as defined below) collected through the Site and certain identifying information. personal data collected from third parties, as set forth in this Privacy Notice.

2. WHAT INFORMATION ITS COVERED UNDER THIS POLITICS

Our privacy policies cover information collected from you through your use of our site. There will be some features of our web interfaces that will not require you to disclose information; however, for services related to offers, promotions, surveys, purchase and use of our services, personally identifiable information will be required.

"Personal identification information" (information that can be used to identify you or that identifies you) (also called "personal data" or "personal information"). This information may include your name, email address, IP address, among other things. You are solely responsible for the accuracy of the information sent to **WE ASSIST**.

www.weassistgroup.com does not automatically recognize any information from a domain or email address when entering the site.

Any information collected is used only:

- a. To manage, grow and develop **WE ASSIST**
- b. To improve the content of our online interfaces
- c. To personalize the content of our website for each individual visitor
- d. To improve our operation and customer service
- e. To improve the products offered in our online interfaces



- f. To inform the user about updates to the website or mobile application
- g. To communicate with the user for marketing purposes, if they give their permission to do so
- h. To carry out research, statistical analysis, product development and personalized services.

No information collected is shared with other organizations for commercial purposes. The company also collects other information that does not reveal the specific identity of the user, such as:

- i. browser information;
- j. information collected through cookies, web beacons (pixel tags) and other technologies;
- k. demographic information and other information supplied by the user; and consolidated information.

Email address information is collected only when a user communicates with the company by email or when the user voluntarily offers this information, such as in a survey and / or when registering on the site. If the user does not wish to receive information from the company by email, they must mark the corresponding option in any of our contact forms, or contact the company through the address indicated above.

If the user provides the company with their telephone numbers over the Internet, they will only receive telephone communications from the company with information about orders that they have made on the Internet to our platform.

Other information obtained in various ways, including:

Through your Internet browser: most websites collect certain information, such as the user's IP address (that is, the address of your computer on the Internet), your screen resolution, the type of operating system (Windows or Mac) and the version, the type of Internet browser and the version, the time of the visit and the page or pages visited. The company uses this information for purposes of calculating usage levels for the Site, to help diagnose server problems, and to administer the site.

3. WHAT PERSONAL INFORMATION DO WE COLLECT:

Personally identifiable information provided directly by you or by third parties.

We collect personally identifiable information that you provide to us when:

- a. register for an account, as well as updated account information,
- b. buy products or services on our site
- c. complete a survey conducted or sponsored by us
- d. sign up for email updates,
- e. participate in our forums, conferences, public or private webinars
- f. participate or accept, by mail or the website, our offers or promotions of content or services on our site or networks.



- g. access or log in to a third party site, for example Facebook, from our sites, or make an expedited registration through your google account. This may include the text and / or images of your personally identifiable information available on the third party site.

WE ASSIST may use the information provided to answer your questions, offer you content or service offers specific to your needs, send you updates on content or service offers or other **WE ASSIST** events and / or send you emails about maintenance. or site updates.

If you participate in seminars, conferences, webinars, surveys or suggestions to improve the experience, or share information with us publicly through other means, such as social networks or direct communications with our staff, we may collect certain generated content from you. .

You must not include any personally identifiable information or other information of a personal or sensitive nature, whether related to you or another person, in any of the aforementioned eventualities, except the information required to participate in such eventualities.

4. WHAT INFORMATION DO YOU PROVIDE US:

When purchasing our products, you will request certain contact information that will be necessary to register you on the platform as a requirement for the issuance of our vouchers or assistance products. Some of these information requirements include, but are not limited to, name, address, phone number, email, passport, destination, emergency contact information, and travel dates for our travel products.

In connection with the facilitation of transactions, purchases and payments through the Platform, you will be asked to provide certain payment information. This may include bank account numbers, pay stubs, credit / debit card numbers, expiration dates and security code, and check or money order tracking information to facilitate selling and purchasing.

5. WHAT INFORMATION DO WE AUTOMATICALLY COLLECT:

WE ASSIST and its sites automatically collect information as follows:

- a. If you contact us (for example, through our customer service chat service, telephone or email), we may record a copy of your correspondence and request additional information to verify your identity.
- b. We will collect contact details and other information on users from publicly available sources in order to verify users and perform due diligence on users.



- c. We will collect details of the activities, transactions and interactions of users on the Platform, including information related to the types and specifications of products and services purchased, records of disputes, claims and attentions, communications between users and any information disclosed in any forum discussion.
- d. From time to time, we may also collect information about existing and potential users, during or in connection with promotions, marketing events in partnership with other brands, industry events and / or other functions; including representative contact names, addresses, telephone numbers, fax numbers, and email addresses.
- e. If you visit our Platform, we will automatically collect certain information from your device. In some countries, including countries in the European Economic Area, this information may be considered personal information under applicable data protection laws. Specifically, this information may include IP addresses, device type, unique device identification numbers, browser type, broad geographic location (for example, location at the country or city level), browsing patterns, and details of how you have interacted with our Platform and the goods and services available on it. In addition, we collect statistical information about the Platform, its use and performance, and visitors to the Platform, including browser software, operating system, software and hardware attributes, pages visited, number of sessions, and unique visitors.

Collecting this information allows us to better understand the visitors who come to our Platform, where they come from and what content they are interested in. We use this information for our internal analysis purposes and to improve the quality and relevance of our Platform. Some of this information may be collected using cookies and similar tracking technology, as explained further in section E "COOKIES" below in section 9.

6. WHAT INFORMATION DO WE RECEIVE FROM THIRD PARTIES:

We may receive personal information about you from social media platforms if you decide to register for an account on the **WE ASSIST** platform using a social media account. The exact information we will receive will depend on the privacy settings applied or applicable on the social media platform, but typically include basic information from your profile such as:

- a. Your name
- b. Profile picture
- c. country
- d. Company's name
- e. Contact information

We may also receive personal information about you from third parties that are integrated with us to assist us with verification services and conduct of anti-money laundering policies and Know your client or KYC (Know-your-customer) in the review of our users, and to improve our marketing efforts.



This can include information such as your name, email, company details, and contact information for company representatives.

7. HOW DO WE USE THE INFORMATION:

Information related to your use of our Site. We will use the information related to your use of the Site to improve the site experience and create higher quality services. We are capable of this, by performing statistical analysis of the collective data produced by the behavior of our users, and by measuring demographic data and interests with respect to specific areas of our Site. We may also use this information to ensure the security of our Services and the Site.

Personally identifiable information provided directly by you or by third parties. Except as set forth in this Privacy Notice or as specifically agreed by you, **WE ASSIST** will not disclose your Personally Identifiable Information. In addition to the other uses set forth in this Privacy Notice, we may disclose and otherwise use Personally Identifiable Information as described below.

- **Verify your eligibility** to register on our platform according to our terms of use;
- **To create and / or manage your user accounts**, including the provision of ID's for log-in and / or to develop a profile on the platform;
- **To manage, grow and develop WE ASSIST.** We use the information you provide to us to provide you with access to our site. To improve it according to the collective interests of users, contact us, among other things, so that **WE ASSIST** develops and markets the best assistance products.
- **For technical support and security and customer service.** We may use your personally identifiable information to provide you technical assistance and to ensure site and user security. To monitor the security of the accounts and the risks of transactions between users, detect fraud and prevent money laundering, among other security incidents and to provide support and customer service and respond to their questions, claims and / or disputes.
- **To communicate with the user.** We use the personally identifiable information collected when you subscribe to our email services or when you download and register for an application from us, to contact you for commercial, informational, content update and offers on the site or our social networks. We may also archive this information and / or use it for future communication with you, where we have the legal right to do so.
- **Forums, conferences, webinars.** When you participate in some of the events (Forums, conferences, webinars) organized by **WE ASSIST**, you must not publish any personally identifiable information or other information of a personal or sensitive nature, whether related to you or another person, within a publication of the event publicly. If you choose to publish this personally identifiable information, such personally identifiable information may be collected during the



event by participants by third-party participants and by **WE ASSIST**. This information may be published through extensions of our Platform that use third-party services, such as mobile applications. **WE ASSIST** reserves the right to reuse event postings that contain personally identifiable information in future versions of Offers and promotions for events, products or services, and / or to improve future Offers and promotions. **WE ASSIST** may archive this information and / or use it for future communications with you and / or your designee (s), and / or provide it to the Content Provider, associated business partner (s) in the events that it has participated. We may also use or post postings sent at events without using personally identifiable information.

- **Participation in product or service offers and / or promotions ("product offers").** We use the personally identifiable information that we collect from you when you participate in a product offering through the site for the purposes of processing and quality of the operation, including, but not limited to, monitoring and servicing the service purchased, among other things, ensuring that the complete delivery of assistance to the correct person at the necessary time. **WE ASSIST** may also share your Personally Identifiable Information and your performance in a particular product or service offering with the parties involved in said product offering to assist with the creation, modification, or operation of the product or service provided in conjunction with affiliated merchants. to said offer. We may also use the information generated during the use or acquisition of an Offer or when using the **WE ASSIST** Services for predictive analysis of your performance in the Offers or promotions. In addition, we may archive this information and / or use it for future communication with you, where we have a legal right to do so.
- **Communications with or from WE ASSIST.** When you send us an email message or contact us, we may use the information provided by you to respond to your communication and / or as described in these privacy policies. We may also archive this information and / or use it for future communication with you when we are legally authorized to do so. When **WE ASSIST** sends you emails, we can track how you interact with these emails. We use this information for the purpose of optimizing and better tailoring our communications to you.
- **Data analytics.** Conduct research or statistical analysis in order to improve the content and design of the platform and to improve the product and service offerings at **WE ASSIST**, including, for example, using anonymous data for machine learning purposes.
- **Identity verification.** If any service or course offered by **WE ASSIST** requires verification of your identity, we may use the Personally Identifiable Information that we collect to verify your identity and to authenticate that you made presentations on the Site. This verification process may be required of you through a series of steps or it may be provided through a third-party identity verification provider. If a third-party identity verification provider is used, your photo ID will be removed after a successful verification of your profile information.



- **Identify, develop and market and advertise products and services** that we believe you will value, including on all browsers and devices, in accordance with applicable laws. Cookies or other similar technologies may be used to serve you advertising based on your browsing activities and interests (see section 9. "COOKIES" below). Where required by applicable law, we will seek your consent before sending you communications for marketing purposes;

We may also use your personal information for other purposes that are not incompatible with the purposes that we have disclosed to you (such as archival purposes in the public interest, scientific or historical research purposes, or statistical purposes) as long as this is permitted by data protection laws.

8. DISCLOSURE OF PERSONAL INFORMATION

We may disclose (or provide access to) personal information to the following categories of recipients:

- a. Other users of the platform when necessary in relation to the facilitation of purchases and communications made between you and the other users.
- b. Third party business partners, service providers and / or affiliates of **WE ASSIST** contracted by us or who work with us to help us provide services to you or otherwise process personal information for the purposes described in this Privacy Policy or that we notify you when we collect your personal information. The categories of these partners or service providers include:
 - i. Members of **WE ASSIST** and their respective affiliates and / or their designated service providers who work with us to provide processing services such as software, tools, systems, and messaging services for the purposes described in this Privacy Policy;
 - ii. marketing and advertising platforms, such as Google, Twitter, Facebook and Instagram, and providers of analysis services related to user behavior, to adapt the content you see when you visit our Platform. These platforms may combine the information they collect on our Platform with data from their platforms and the data they collect from other websites or other sources for targeted advertising. The processing activities of these third-party marketing platforms are governed by their own privacy policies, not by this Privacy Policy;
 - iii. payment service providers that collect and process personal information to help settle payments for transactions or process withdrawal requests from sellers.



The activities of payment service providers may be governed by their own privacy policies, not by this Privacy Policy;

- iv. Customer service team to provide after-sales services;
- v. risk control service providers to assess the security of user accounts and transaction risks; and
- vi. saw. third party rating / review service providers to carry out reviews of our services with clients if you choose to participate in the review or rating of WE ASSIST products and / or services;
- vii. To our professional advisers, law enforcement agencies, insurers, government and regulatory organizations and other organizations where we believe it is necessary to comply with applicable laws or exercise, establish or defend our legal rights or protect your vital interests or the of any other person. , we may also disclose and transfer your personal information or as required or permitted by applicable law.
- viii. To an actual or potential buyer (and their agents and advisers) in connection with any actual or proposed purchase, merger or acquisition of any part of our business, provided that we inform the buyer that they should use their personal information only for the purposes disclosed in this Privacy Policy.
- ix. To any other person with your consent for disclosure.
- x. We may provide aggregated or anonymous data to third parties, but when we do, the information we share is in an anonymous format that does not personally identify you.

9. COOKIES

Cookies are pieces of information that are stored directly on the computer that the user is using. Cookies allow the company to recognize your computer and collect information such as browser type, time spent on the Site, pages visited, and language preferences. The company may use the information for security purposes, to facilitate navigation, to display information more effectively, to personalize your experience while visiting the Site, or to collect statistical information on the use of the Site.

The cookies implanted by the owner of the sites (in this case **WE ASSIST**) will be called "First party Cookies" and those that are implanted by other independent external parties to the **WE ASSIST** sites will be called "Third party Cookies".



Cookies can also be classified as session cookies (which are deleted once you close the browser or turn off the device) and persistent cookies (which remain even after you close the browser or turn off the device / application and are activated every time you visit the Platform). Session cookies use encrypted data to authenticate you. Persistent cookies do not store account numbers or passwords. We use session cookies and persistent cookies.

Why do we use cookies?

We use our own and third-party cookies for various reasons. Some cookies are necessary for technical and / or security reasons in order for our Platform to function, and we refer to them as "essential" or "strictly necessary" cookies. First-party cookies are mainly used to enable basic functionality on our Platform; including web analytics cookies that help us understand how users use our web pages and how we can improve their use. For example, we use essential or strictly necessary cookies to allow us to remember products added to your **WE ASSIST** shopping cart and to recognize you when you log into your **WE ASSIST** account, the latter being "personalization" or "service" cookies.

In addition, we also use "marketing" cookies for social networks and various search engines. You can register to be a member of the Platform and "share" the content of the Platform through social networks such as Facebook and Twitter. They are also used to precisely measure the effectiveness of our online marketplace promotions and conversion rates. Sometimes we embed videos from websites like YouTube. These websites have their own privacy policies governing their use of information, which you can find on the respective websites.

We also use "statistical" cookies to allow us to track and target the interests of visitors to the Platform to improve the experience on our Platform by investigating visitor patterns and conducting interest-based advertising; help our partners and / or affiliated businesses to track user visits to the Platforms; and to track progress and participation in promotions. We use our own and third party cookies for these purposes.

Consent

By using and browsing the **WE ASSIST** sites, you are consenting to the use of the cookies set out above in the conditions contained in section 9. "Cookies" in this privacy policy.

We make the exception that cookies are not necessary for the use of our platform, you will have at all times the option to block or disable them in your browser settings. However, if you decide to deactivate or block them and continue to use our platform, you can do so, but some of their services may be limited, affecting your experience on our platform.

To renounce your informed consent regarding our cookies policy, you must enter the browser of your device through the configuration of your internet browsers. Here are some of the links from the different browsers that report on cookies:

Firefox: <https://www.mozilla.org/es-ES/privacy/websites/>

Chrome: <http://support.google.com/chrome/bin/answer.py?hl=es&answer=95647>



Explorer: <http://windows.microsoft.com/es-es/windows7/how-to-manage-cookies-in-internet-explorer-9>

Safari: <http://support.apple.com/kb/ph5042>

Opera: <http://help.opera.com/Windows/11.50/es-ES/cookies.html>

10. THIRD PARTY LINKS

For your convenience, we may provide you with links to websites operated by organizations other than **WE ASSIST** (Third Party Sites), which based on information provided and analyzed by our site, is of interest to you. We share your personally identifiable information with these third party sites unless we have a legal basis that allows us to do so. We do not endorse and are not responsible for the privacy policies and practices of these third party sites. If you wish to access any of these third-party sites, we recommend that you always carefully read the privacy policies and any other informative document on the site's practices before entering into use of their services and sharing your personal information.

11. RIGHTS OF THE USER

Upon request, the company provides visitors to the site access to all information (including proprietary information) that it holds about them, including

- Information about the unique identifier (for example, customer number or password)
- Information about transactions (for example, the dates that customers made purchases, quantities and types of purchases)
- Communications that the consumer / visitor has directed to our site (eg emails, customer inquiries)
- Contact information (eg name, address, phone number)

Upon request, the company offers visitors the ability to correct errors in such information. To correct this information, consumers can write to the company at the address listed above.

The company may, from time to time, use customer information for new uses not provided for in the notice of its privacy policy. In the event that the company's information practices change at any time in the future, it will notify users of the changes through its website. The user will have the opportunity not to accept these new uses. In case of being concerned about the way their information is used, the user should check the company's website frequently.

We will keep your personally identifiable information for the time necessary for which your personally identifiable information was collected and processed. The duration for which we retain such personally



identifiable information depends on the purposes for which has been collected and used and / or as required by the laws that apply, establish, exercise or defend our legal rights.

If you consider that this site does not follow the information policy indicated, the user can contact the company at the address indicated above.

12. CONFIDENTIALITY AND SECURITY OF THE SITE AND YOUR PERSONAL IDENTIFICATION INFORMATION

WE ASSIST uses industry standard SSL encryption technologies, when transferring and receiving confidential information (for example, credit card details and personal information). The pages on which this information is exchanged are located on a secure server.

Payment processes are processed by a service from a third-party provider with PCI-DSS Compliant certification.

Several of the assistance plans that **WE ASSIST** offers have an online enrollment and / or subscription option. The company understands user concerns about Internet security and works closely with its developers to maintain forms in a highly secure ordering environment so that the user can sign up for the company's services with confidence.

When the user is ready to enroll in one of the company's services, it will move to a secure area of the site. Once logged in, the beginning of the page address (URL) will change from http to https, indicating that the user is in a secure area. An icon with a closed key or padlock will also appear in the lower right corner of most browsers to indicate this change. The user will remain in this safe area throughout the purchase process.

WE ASSIST considers the confidentiality and security of your information and the use of its site to be of the highest importance. For this reason, **WE ASSIST** will take the corresponding technical, physical, legal and organizational measures, which will be consistent with the applicable privacy and data security laws. Unfortunately, it is not possible to guarantee that any data transmission over the Internet or a data storage system is 100% secure. If the user has reason to believe that their interaction with the company is no longer secure (for example, if they consider that the security of any Personally Identifiable Information that the company may have has been threatened), it is their responsibility to immediately notify the company.

13. LEGAL BASE FOR DATA PROCESSING

13.1 WE ASSIST will process personal information for the purposes set out in this Privacy Policy, as described above. Our legal basis for processing personal information will depend on the personal information in question and the specific context in which we collect it. However, we will normally collect and process personal information about you only where:

- a. necessary to provide the services in accordance with the agreement between you and **WE ASSIST** and / or its affiliates, for example, to provide you with the services you request and to identify and authenticate you so that you can receive our services;
- b. necessary to comply with legal requirements (for example, to comply with applicable accounting standards and / or to make mandatory disclosures to competent authorities;
- c. necessary for our legitimate interests and not overridden by your rights; me
- d. where it is based on your consent.

13.2 If we collect and use your personal information based on our legitimate interests (or those of a third party), this interest will normally be to operate our Platform and provide our services, manage our relationship with you, and communicate with you as necessary to provide our services. . For you and for our legitimate business interest, for example, when responding to your inquiries, improving our Platform and our services, conducting marketing, or for the purpose of ensuring the security of our Platform and the effectiveness of our services and detecting or preventing illegal activities like fraud. We may have other legitimate interests and, if applicable, we will make it clear to you at the relevant time what those legitimate interests are.

13.3 If we ask you to provide personal information to comply with a legal requirement or to enter into a contract with you, we will clarify this at the relevant time. We will inform you whether the provision of your personal information is mandatory or not (as well as the possible consequences if you do not provide your personal information). In some cases, you may need to provide us with personal information for processing as described above, so that we can provide you with all of our services, and so that you can use all the functions of our Platform.

If you have questions or need more information about the legal basis on which we collect and use your personal information, please contact us using the contact details provided in section 17. "ADDITIONAL QUESTIONS AND COMMENTS" below.



14 INTERNATIONAL PRIVACY PRACTICES

The **WE ASSIST** Sites are operated and administered primarily on servers located and operated within the United States. In order to provide you with our products and services, we may send and store your personally identifiable information outside of the country where you reside or are located, including to the United States. Consequently, if you reside or are outside of Panama, your personally identifiable information may be transferred outside of the country where you reside or are located, even to countries that may or may not provide the same level of protection for your information.

WE ASSIST is committed to protecting the privacy and confidentiality of personally identifiable information when it is transferred, using the best practices available at its disposal; however, no data transmission over the internet or over a wireless network can be guaranteed as "perfectly secure". As a result, although we try to protect the information we maintain about you, we cannot guarantee the security of any information that you transmit to us and you do this at your own risk.

15 CHANGES TO OUR PRIVACY POLICY

Our privacy practices and policies are reviewed from time to time, for this reason, they are subject to change. Any change, update or modification will be effective immediately it is published on our site. We will notify you of any material changes to these privacy policies by means of a notification on our site for a reasonable period after the update has been published or by sending an email to your email associated with your account; also changing the effective date of the policies at the beginning and end of this page or document. Be sure to read this page or document periodically to be familiar with the latest version of our privacy policies.

16 PREGUNTAS Y COMUNICACIONES ADICIONALES

In case of questions or to communicate with the company, send an email message or correspondence to:

WE ASSIST CORP

Direction: Torre Financial Center, Piso 17, Calle Elvira Mendez, Panamá

Telephone: (507) 396-1010

email: legal@weassistgroup.com

website: www.weassistgroup.com