

Privacy Policy

1. INTRODUCTION.

puntpal ensures the maximum reserve and protection of those personal data that users of the website owned by it ("Users"), located at the electronic address: <https://puntpal.com> enter the site in order to use its services.

2. OBJECTIVE AND PURPOSE.

At **puntpal** we are aware of the high regard for the privacy of our customers and all those who are interested in our services; in short, from our users. Being consistent with this consideration we are committed to respecting your privacy and protecting the confidentiality of your private information and personal data. And that is why the objective of this privacy policy is to inform **puntpal** users through the Internet of the way in which the personal data that are entered by them in the different data collection forms found on the website <https://puntpal.com> at their disposal are collected, processed and protected.

Private personal information does not include information that is available through publicly accessible sources. Such means of electronic, optical and other technology communication designed to provide information to the public and open to general consultation, telephone directories, newspapers and magazines, social media, professional lists, anonymized jurisprudence repertoires, public registries administered by the National Superintendence of Public Registries, as well as any other registry or database classified as public according to Law, the entities of the Public Administration in relation to the information that must be delivered in application of Law No. 27806, Law on Transparency and Access to Public Information.

3. LEGISLATION.

In accordance with the Personal Data Protection Law of Curaçao (2013) and EU Regulation 2016/679 regarding the use of personal data and data protection (General Data Protection Regulation, "GDPR"), personal data is understood to be any information about an identified or identifiable natural person ("the data subject"). An identifiable natural person is

considered to be a person whose identity can be directly or indirectly determined, particularly through an identifier, such as a name, an identification number, location data, an online identifier, or one or more factors specific to the physical, physiological, genetic, mental, economic, cultural, or social identity of that person.

And by the Processing of Personal Data, any operation or set of operations performed on personal data or sets of personal data, whether by automated or non-automated means, such as collection, recording, organization, structuring, storage, adaptation, or alteration, retrieval, consultation, use, communication by transmission, dissemination, or any other form of making access available, alignment, limitation, erasure, or destruction.

puntpal develops its policy for the processing of personal data in compliance with the guiding principles established in the Personal Data Protection Law of Curaçao (2013) and the EU Regulation 2016/679 regarding the use of personal data and data protection (General Data Protection Regulation, "GDPR"), and, therefore:

In accordance with the principle of legality, the collection of personal data of our users through fraudulent, unfair, or unlawful means is rejected.

In accordance with the principle of consent, the processing of personal data of our users will be based on their consent.

The personal data of our users will be collected for a specific, explicit, and lawful purpose and will not be further processed in a manner incompatible with that purpose, except for cases of historical, statistical, or scientific activities when an anonymization or disassociation procedure is used.

All processing of personal data of our users will be adequate, relevant, and not excessive for the purpose for which they were collected.

Personal data to be processed will be accurate, and, to the extent possible, up-to-date, necessary, relevant, and appropriate for the purpose for which they were collected. They will be stored in a manner that ensures their security and only for the time required to fulfill the processing purpose.

puntpal and, if applicable, data processors, take the necessary technical, organizational, and legal measures to ensure the security and

confidentiality of personal data. puntpal has appropriate security measures in place, in line with the processing to be carried out and the category of personal data involved.

puntpal informs that, to exercise any of their rights, individuals must submit a special request. If desired, please contact us via the following email address: customersupport@puntpal.com. Your request should include relevant identification details and supporting documents. puntpal will respond to your request within a maximum of 30 days and will address each request individually. If you do not receive a response within the specified timeframe or are not satisfied with the processing of your personal data, you have the right to contact your local data protection authority.

puntpal ensures an adequate level of protection for the personal data of our users for cross-border data flows, with a minimum level of protection equivalent to that provided by this law or international standards in the field.

4. INFORMATION

The user is informed that their personal data, to which puntpal has access as a result of inquiries about services and their contracting are incorporated into the corresponding "Personal Data Bank", as an organized set of personal data of our users, created by **puntpal** and registered in the National Registry of Protection of Personal Data competence of the National Authority for the Protection of Personal Data, authorizing **the user puntpal** to the treatment of those that are necessary for its use in relation to the development of the operation or service to which they refer.

The user expressly authorizes **puntpal** to use their data in the offer and contracting of products and services, as well as for the development of commercial actions, whether of a general nature or adapted to their personal characteristics.

These commercial actions may be carried out by email or other equivalent means of electronic communication, by means of advertising or promotional information, of a general nature or adapted to your commercial profile, about the services offered and marketed by **puntpal**.

In these commercial actions the user will be adequately informed regarding the mandatory or optional nature of the response to the questions that are raised in the respective forms, and of the consequences of the refusal to provide the data requested.

By sending any of the forms that appear on the portal, the user freely and unequivocally gives his consent to the regime of the processing of personal data and the email address described in the notice on said regime enabled in the corresponding form.

In the event that among the purposes to which **puntpal** destines the data is to treat them for advertising or promotional purposes, at the time of filling in the corresponding form the user may oppose the receipt of advertising or promotional information by clicking on the box for this purpose enabled in it.

The personal data, including the email address, that the user provides when filling in and sending the forms contained in the portal with domain <https://puntpal.com> will be incorporated into the databases of **puntpal** so that it can carry out the treatment, automated or not, of such data, as well as those that may be generated due to the corresponding contractual relationship that, where applicable, the user agrees with **puntpal**.

By sending any of the forms contained in the <https://puntpal.com> portal, the user gives his unequivocal consent to the regime of the processing of personal data and the email address described in the notice on said regime enabled in the corresponding form.

5. COMMUNICATION BY TRANSFER (ASSIGNMENT)

The user authorizes the communication or transfer of the aforementioned data to the companies associated with **puntpal** for the same purpose indicated in the previous sections, extending to them the express authorization for the use of email or equivalent means.

Users are informed that such transfer occurs at this very moment to the entities whose name, activity and registered office are indicated below. In the case of subsequent assignments in favor of other entities, **puntpal** will communicate such assignments to the

interested party in the usual way used to inform him of the services he has contracted with this association.

For these purposes, the following are the entities to which the personal data of our users may be communicated or transferred:

These are the partners of **puntpal**:

1.-) GAMES & MORE BV

2.-) PAY RETAILERS

3.-) PAYMINTO

The user may revoke the authorizations he has given for the use or transfer of his personal data in the same manner as established in section 7 of this document, except as provided in section 1 of this clause that is mandatory.

The user may revoke at any time the authorization granted for the use or transfer of their data, without prejudice to the right of **puntpal** to terminate the contract or operation in question, when such data were essential for the good purpose of the same. You can also modify the data that, through the website, you have provided to **puntpal** by writing to the Customer Service attaching a copy of your ID, immigration card, passport or via email.

If the user wishes to revoke the consent given for the receipt of advertising or promotional information by email or other equivalent means of electronic communication, it will be sufficient for this purpose to notify **puntpal** by sending a message to the email address indicated below customersupport@puntpal.com

6. QUALITY OF PERSONAL DATA

The personal data requested from Internet Users in the different forms of the website, are basic contact data and are adequate, relevant and not excessive in relation to the purpose for which they are collected.

The personal data requested from the users of <https://puntpal.com> and/or **puntpal** to the Users the appropriate technical resources so that they become aware of this Privacy Policy and any other information that may be relevant, constituting the entry of Personal Data or confidential information on the Website the express manifestation of their consent to this Privacy Policy.

The personal data to which **puntpal** will have access will be those that the user voluntarily provides. That is why we welcome as our responsibility to let our users know that to register and register for some products or services we offer through the Web, you will be asked for personal data.

In this way, in the cases and with respect to the data in which this is expressly indicated to the user, if he does not provide them, he will not be able to access or use the aforementioned services and contents.

Your personal information may only be known and handled by **puntpal** staff who need to know such information in order to provide you with the information corresponding to the services of the association. Sensitive data or passwords of the user will never be requested.

The personal data provided by Internet Users must be accurate and correct so that they respond truthfully to their current situation. Otherwise these data will be canceled.

The personal data provided by Internet Users will be treated fairly and lawfully.

The personal data provided by Internet Users are collected for the fulfillment of the purposes set forth in this document and will not be used for other purposes incompatible with those specified.

Personal data will be cancelled when they are no longer necessary for the purposes for which they were collected. However, they will be kept for as long as **puntpal** may be held liable for this relationship with Internet Users.

7. PURPOSE OF THE PROCESSING OF PERSONAL INFORMATION.

The purposes of processing the personal data that Internet Users enter in the different forms of the website are to be able to carry out the commercial, communication, marketing, administrative and user support management related to the services offered by <https://puntpal.com>. As well as answering queries and other information requested by Internet Users and being able to provide any information that **puntpal** believes may be of interest to them.

puntpal may collect, analyze and use the information it obtains from Users, as a collective whole. Thus, you can determine which areas are preferred or the most used services. Such information, which is only used in anonymous and aggregated form, in order to determine how to make the Site increasingly better for its Users.

When Users enter their Personal Data, the Site opens a personal page for each User in which it stores their background and history, we use this information in order to be able to fully identify you when using our services, allow you a more personalized experience and be able to send information via alerts or email. Users can enter (with their username and password) at any time that requires reviewing, updating and / or modifying their Personal Data contained therein.

puntpal shall be responsible for the Database and the Personal Data contained on each personal page. In order to prevent the loss, misuse, alteration, unauthorized access and theft of Personal Data or Confidential Information provided by Users, **puntpal** has adopted the levels of security and protection of Personal Data legally required, and has installed all the means and technical measures at its disposal.

puntpal respects the privacy of its users, we will not share your information with third parties if you do not expressly want us to do so.

8. PROCESSING OF PERSONAL DATA AND CONSENT

The personal data provided by Internet Users will be stored in the data banks that are part of the **puntpal** information system and will be processed in order to carry out the purposes set out above.

Data banks containing personal data are registered in the Data Protection Registry of the competent Authority.

The Internet User who provides personal data authorizes its treatment in order to carry out the purposes set out in the previous point.

9. COMMUNICATION OF PERSONAL DATA

Personal data will be communicated by transfer between the companies and subsidiaries that are part of **puntpal** in order to properly manage the products and services requested by Internet Users and the procedures that arise subsequently.

This personal data may also be communicated to administrative entities, judicial and/or police authorities, as long as it is established by Law.

10. CONFIDENTIALITY OF PERSONAL DATA

The personal data provided by Internet Users will be treated with total confidentiality. **puntpal** undertakes to keep professional secrecy regarding them and guarantees the duty to keep them by adopting all necessary security measures.

11. SECURITY OF PERSONAL DATA

In compliance with current regulations, **puntpal** has adopted the technical security and confidentiality measures appropriate to the category of personal data, necessary to maintain the required level of security. And this with the aim of avoiding as far as possible the alteration, loss or treatment or unauthorized access to the extent that they may affect the integrity, confidentiality and availability of the information.

puntpal has implemented all the necessary technical and organizational measures to guarantee the security of personal data and prevent its alteration, loss and treatment and / or unauthorized access, taking into account the state of technology, the nature of the data stored and the risks to which they are exposed, whether they come from human action or from the physical or natural environment, as established by current Peruvian legislation on the protection of personal data.

puntpal also has additional security measures in place to reinforce the confidentiality and integrity of information and continuously maintains monitoring, control and evaluation of processes to ensure the privacy of personal data.

However, the transmission of information over communication networks and the Internet is not completely secure; therefore, and although **puntpal** will make its best efforts to protect personal data, it cannot guarantee the security of the same during transit to the website. All information that Internet Users provide by this means will be sent at their own risk.

That is why **puntpal** recommends the utmost diligence to our users when they transfer to third parties or publish personal information to avoid putting their personal data at risk, avoiding **puntpal** all responsibility in case of theft, modifications or loss of illicit data.

12. EXERCISE OF RIGHTS OF ACCESS, RECTIFICATION, CANCELLATION AND OPPOSITION

Internet Users who have provided personal data to **puntpal** can contact it, in order to be able to exercise their rights of information, access, updating, inclusion, rectification and deletion, to prevent the provision of their personal data, to oppose the treatment or objective treatment of the data, in the terms included in the current legislation.

In order to exercise these rights, Internet users can contact, by any means that allows to prove the sending and receipt of the request to customersupport@puntpal.com with the reference "Protection of Personal Data", specifying their data, proving their identity and the reasons for their request.

13. MINORS

puntpal understands the importance of protecting children's privacy, especially in an online environment. For this reason, the website is not designed or directed to children under 18 years of age.

puntpal will not voluntarily process personal data relating to minors. In the event that it is known that the personal data collected correspond to a

minor without authorization, appropriate measures will be taken to delete this data as soon as possible.

14. OTHER

To make any type of query regarding this policy you can contact the following email address: customersupport@puntpal.com

15. VALIDITY AND MODIFICATION OF THIS PRIVACY POLICY

The Web Privacy Policy of **puntpal** and/or <https://puntpal.com> has been updated in November 2022.

puntpal reserves the right to modify its Web Privacy Policy in the event that there is a change in current legislation, doctrine, jurisprudence or by its own business criteria. If any changes are made to this Policy, the new text will be posted on this website.

Internet Users are advised to periodically access this privacy policy found on the website <https://puntpal.com>