Cloud Services Privacy Policy

Version date: December 11, 2025

Privacy Statement

Data privacy is a strategic priority for InvGate. We aim to uphold the highest standards in protecting privacy and safeguarding personal data. To this end, we are committed to dedicating the necessary resources to maintain compliance and to continuously enhance our practices in line with evolving legal and regulatory requirements.

In this regard, we comply with applicable data protection laws and regulations, including the European Union's General Data Protection Regulation (GDPR), the UK General Data Protection Regulation, the California Consumer Privacy Act in the United States, Mexico's Federal Law on the Protection of Personal Data Held by Private Parties, Brazil's General Data Protection Law, and Argentina's Personal Data Protection Law, among others (the "**Data Protection Laws**"). Compliance with the Data Protection Laws is ensured through documented privacy practices, governance processes, and continuous monitoring designed to protect the personal data entrusted to our Solutions.

Scope of this Policy

This Cloud Services Privacy Policy (the "**Policy**") applies to Service Data containing personal data (as such term is defined in the Data Protection Laws). Such personal data may be stored in, or otherwise processed between, the Customer and its end users when using the Solutions. In these cases, InvGate acts as a processor of personal data on behalf of the Customer, who remains the controller responsible for determining the purposes and means of processing.

This Policy is for informational purposes only and does not create contractual obligations. InvGate's binding commitments are set out in our Master Subscription Agreement (the "**MSA**"), including the Data Processing Addendum (the "**DPA**") incorporated by reference in the MSA. Capitalized terms not defined in this Policy have the meanings given in the MSA or in the DPA, as applicable. References to Customer in this Policy also include any prospect conducting trials of our Solutions.

For our security practices and certifications, including the measures implemented to protect Service Data, please refer to our Cloud Security Practices and to the resources available in our Trust Center.

For our practices regarding personal data that we collect directly through our website, where InvGate acts as controller, please refer to our Website Privacy Policy.

This Policy applies only to the Solutions that InvGate hosts in its cloud infrastructure. For on-premises deployments or perpetual licenses, InvGate does not process Customer's Service Data, and Customers remain solely responsible for compliance with applicable Data Protection Laws. Any limited technical information transmitted to InvGate in this context is processed in accordance with our Website Privacy Policy.

Data Protection and Processing

When the Customer uses the Solutions hosted in our cloud infrastructure, InvGate acts as a "Data Processor", processing personal data on behalf of the Customer as "Data Controller" (as such terms are defined in Data Protection Laws). The Customer retains full control over the personal data uploaded to our Solutions and is responsible for ensuring its processing complies with applicable Data Protection Laws.

When processing personal data through the Solutions, InvGate implements appropriate technical and

organizational measures as required under the Data Protection Laws. These measures include:

- Technical safeguards: encryption of data over public networks and periodic security reviews, as described in our Cloud Security Practices.
- Certified infrastructure: we adhere to recognized codes of conduct and maintain multiple certifications, including ISO 9001, SOC 1, and SOC 2 (Types I and II). As of the version date of this Policy, we are in the process of certifying ISO 27001.
- Data protection by design and by default: our Solutions are designed to enable the Customer to meet its compliance obligations under the Data Protection Laws, including configuration options to limit or control the processing of personal data.
- International data transfers: all transfers comply with the requirements of applicable Data Protection Laws.
- Access and third-party disclosures: we do not grant access or disclose to third parties personal data, except where necessary to provide our services, where explicitly authorized by the Customer, or where required by law.

For more detailed information about our respective roles and obligations, please refer to our DPA.

International Transfer

Hosting, backup, and other processing activities performed by InvGate may involve the international transfer of personal data. All such transfers are carried out in compliance with applicable Data Protection Laws, relying on recognized transfer mechanisms such as adequacy decisions, standard contractual clauses, or other legally valid safeguards. International transfers may occur in the following contexts:

- Hosting.

  Customer may select the data center's geographic region for hosting its Service Data from the options set forth in our Cloud Security Practices.

- Redundancy, high availability, and disaster recovery.

  For redundancy, high availability, and disaster recovery, Service Data may be replicated to alternate data centers in other countries.

  Service Data hosted in the Germany data center is replicated in the United Kingdom data center. Under article 45 of GDPR, the Commission of the European Communities has recognized the United Kingdom as providing an adequate level of protection of personal data under Commission Implementing Decision (EU) 2021/1772 of 28 June 2021 and Commission Implementing Decision (EU) 2021/1773 of 28 June 2021.

  For its part, Service Data hosted in the United Kingdom data center is replicated in the Germany data center, while Service Data hosted in other data centers is replicated in the Oregon (United States) data center.

- Support, maintenance and monitoring.

  In certain cases, our personnel may access Service Data for purposes of support, maintenance and monitoring. Access shall be made by personnel of InvGate S.R.L. via our operations center in Argentina.

Under article 45 of GDPR, the Commission of the European Communities has recognized Argentina as providing an adequate level of protection of personal data under Commission Decision 2003/490/EC of 30 June 2003.

- AI features.

  If Customer enables our artificial intelligence and machine learning features and functionalities, Service Data will be sub-processed by licensed third-party large language model providers, as further described in our AI Features Usage Guidelines. For this purpose, Service Data will be transferred to the United States for processing. Under Article 46 of the GDPR, these international transfers are permitted through the Standard Contractual Clauses incorporated in the Data Processing Addendums of the cloud service platforms that host and deliver such models, as described below:

  Microsoft Azure DPA

  Google Cloud DPA

  Amazon Web Services DPA

  If Customer does not wish to accept these sub-processing arrangements or international data transfers, Customer may opt out of the AI-powered features as set out in our AI Features Usage Guidelines.

Data Retention

We retain Service Data containing personal data for the duration of the Customer's active subscription and as provided in our DPA. Upon expiration of the subscription term, the Customer may request deletion of the Service Data in accordance with the terms of the MSA. InvGate will complete such deletion within fifteen (15) days of receiving the request. If no deletion request is submitted, InvGate will erase the Service Data containing personal data within six (6) months following the expiration or termination of the subscription, unless a longer retention period is required to fulfill legal obligations under applicable Data Protection Laws or to comply with the terms of the MSA.

Access, Rectification, Deletion, and Other Rights

If you are an individual wishing to exercise any of the rights granted under Data Protection Laws, you must contact directly the Data Controller (that is, the Customer of InvGate who interacts with you and determines the purposes and means of processing your personal data in our Solutions). InvGate, as a Data Processor, does not manage or control the Customer's Service Data and therefore cannot fulfill such requests on the Customer's behalf. If you mistakenly direct your request to InvGate, we will, where possible, forward it to the Customer for their direct handling. When applicable, we shall provide the Customer with reasonable assistance to enable the Customer to respond to data subject requests in accordance with applicable Data Protection Laws, as provided in our DPA.

Use of Cookies and Single Sign-On

We may store certain information on your device through cookies or similar technologies. Cookies are used to facilitate your use of our Solutions and enhance your experience (for example, by measuring performance or enabling specific platform features). You can manage or disable cookies at any time through your browser settings; however, doing so may affect the functionality of certain features. Where required by applicable Data Protection Laws, we will obtain your consent before storing or accessing cookies on your device. For more detailed information about the types of cookies we use, their purposes, and retention

periods, please refer to our Cookie Policy.

You may also access our platform using single sign-on (SSO) services such as Google, Microsoft Office 365, or other identity providers using SAML. These services authenticate your identity and may share certain personal data with us, such as your name and email address, in order to enable access to our Solutions.

Data Protection Inquiries and Requests

InvGate has appointed a Data Protection Officer (DPO) as the primary point of contact for any questions or concerns regarding this Policy or our personal data protection practices. If you wish to exercise your privacy rights or make an inquiry related to this Policy, you may contact our Data Protection Officer at dataprotection@invgate.com.

Changes to this Policy

InvGate may update this Policy from time to time to reflect changes in its practices, technologies, or legal and regulatory requirements. Updates will be uploaded on the Trust Center.

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For prior versions of this Cloud Services Privacy Policy, please refer to:

- February 21, 2024, version.