

DATA POLICY TRADING PRODUCE LLC

Delaware, 108 West 13th Street, Wilmington, county of New
Castle.

TRADING PRODUCE LLC DATA POLICY

CONTENTS

..... 1

NOTICE.....3

NOTICE FOR MINORS 3

NOTICE FOR US RESIDENTS ¡Error! Marcador no definido.

NOTICE FOR PEOPLE OF OLDER AGE INCAPABLE OR WITH ANY CURRENT OR SURVIVING RESTRICTION TO PLAY

CHAPTER I. GENERAL PROVISIONS

.....4

What is the objective and scope of our policy? ¡Error! Marcador no definido.

Who is our Policy addressed to?.....4

What is the data protection regulatory compliance?4

SECOND CHAPTER: PROCESSING OF PERSONAL DATA ¡Error! Marcador no definido.

What personal data do we collect? ¡Error! Marcador no definido.

What is the treatment we give to the information we collect? 7

 1) Collection ¡Error! Marcador no definido.

 2) Storage..... ¡Error! Marcador no definido.

 3) Use and purpose..... ¡Error! Marcador no definido.

 4) Circulation..... 8

 5) Deletion 8

AUTHORIZATION FOR THE PROCESSING OF PERSONAL DATA ¡Error! Marcador no definido.

PROTECTION MEASURES ¡Error! Marcador no definido.

CHAPTER THREE: RIGHTS OF PERSONAL DATA HOLDERS ¡Error! Marcador no definido.

What are the rights of the holder of personal data? ¡Error! Marcador no definido.

 • Right of acces..... ¡Error! Marcador no definido.

 • Right of rectification..... ¡Error! Marcador no definido.

 • Right of cancellation..... ¡Error! Marcador no definido.

 • Right to restriction. ¡Error! Marcador no definido.

 • Right to portability. ¡Error! Marcador no definido.

 • Right to opposition..... ¡Error! Marcador no definido.

What is the procedure to exercise the rights of the holder of personal data? ¡Error! Marcador no definido.

CHAPTER FOUR: FINAL PROVISIONS ¡Error! Marcador no definido.

Permanent measures ¡Error! Marcador no definido.

Policy binding 10

Policy Officer 11

Policy approval date and effective date..... ¡Error! Marcador no definido.

Last update in January 2022

NOTICE

WHEN YOU PROVIDE YOUR DATA TO USE OUR PLATFORM, WE KNOW THE IMPORTANCE AND RESPONSIBILITY, THEREFORE, HERE YOU WILL FIND EVERYTHING YOU NEED TO KNOW ABOUT THE PROCESSING OF YOUR INFORMATION.

KEEP IN MIND THAT OUR POLICY IS BEING CONSTANTLY MONITORED TO ADAPT IT TO THE NEEDS AND SERVICES OF OUR PLATFORM, SO YOU SHOULD CONSTANTLY REVIEW IT TO BE AWARE OF THE POSSIBLE CHANGES THAT WILL ALLOW US TO PROVIDE YOU WITH A BETTER SERVICE.

Within this Policy you will find the following words, which is why we define them from the beginning:

TRADING PRODUCE LLC: It is the Company responsible for this policy and for processing data, hereinafter, "TRADING PRODUCE LLC", "we", "us".

User: Individuals of legal age or companies that make use of our products or services or visit our platform <https://trading-produce.com>. Hereinafter "you", "our users".

Platform: It is our Web platform <https://trading-produce.com> Hereinafter "platform".

Products and services: These are all the products and services offered on our platform. Hereinafter "Services".

NOTICE FOR MINORS

TRADING PRODUCE LLC informs that our Services are NOT directed to children or minor adolescents. IF YOU ARE A MINOR, DO NOT USE THE SERVICES of the <https://trading-produce.com> website. If you are a parent or guardian who has discovered that her child has submitted personally identifiable information, at YOUR request, TRADING PRODUCE LLC will use reasonable efforts to remove the information from its database. To request the deletion of your child's or ward's information and blocking of the account created, send an email to requestorders@trading-produce.com with the subject "USE OF THE PLATFORM BY A MINOR", identifying the user account and a brief summary of the situation.

Our "USERS" will only be natural persons of legal age registered on our platform.

If in your country of residence the age of majority is at an age other than 18, it must be understood that in any case our services are only and exclusively for adults.

NOTICE TO U.S. RESIDENTS

TRADING PRODUCE LLC DOES NOT TRADE or conduct trading operations within the United States of America. Therefore, if you are a resident or the operation expects to be carried out in North American territory, you cannot access our marketing services. If you register as a user of TRADING PRODUCE LLC, you clearly state that the operation will not have economic effects in the United States. Under this section, TRADING PRODUCE LLC is not considered to have a contractual relationship or responsibility, since we do not carry out operations in said territory.

NOTICE FOR PEOPLE OF OLDER AGE INCAPABLE OR WITH ANY CURRENT OR SURVIVING RESTRICTION TO PLAY.

If you are of legal age, but you have any type of affectation, prohibition, medical, psychological or other restriction that prevents you from accessing or generates counterproductive effects on you when using our Services, you are PROHIBITED FROM ENTERING OUR PLATFORM, since WE DO NOT OFFER YOU our services. and WE DO NOT AUTHORIZE YOU to use them. Likewise, if after registering on the platform and creating an account the inability, restriction or limitation occurs, also immediately cancel your account since we PROHIBIT you from using our Services. Under this section, TRADING PRODUCE LLC is not considered to have a contractual relationship or responsibility, since there is no relative or total capacity to accept these Terms.

FIRST CHAPTER. GENERAL PROVISIONS

What is the objective and scope of our policy?

Our Data Policy, hereinafter the "Policy" aims to help you understand as a user, **what information we collect through our platform; For what; What is the data processing process; What are the rights and the procedure to make them effective.** All the above, so that you voluntarily and informedly grant your consent and allow us to process your data.

Our Privacy Policy does NOT apply to:

- a) The information practices of other companies and organizations that advertise our services.
- b) Services offered by other companies or individuals, including products or sites that may be advertised within the TRADING PRODUCE LLC platform.

Keep in mind that when you enter our platform, YOU DECLARE AND AGREE to be aware of our Policy and to have given informed and voluntary consent to the processing of your data through the complete information that we present to you. Therefore, below, we explain step by step and in a simple way everything you need to know:

Who is our Policy addressed to?

Our Policy addresses the people and companies that use our products and services through our platform. Likewise, to employees, suppliers, contractors, and any other data owner who has a commercial or contractual relationship with TRADING PRODUCE LLC.

What is the data protection regulatory compliance?

Our Policy respects the rules and regulations of Personal Data Protection according to the regions where we offer our services. Therefore, keep the following in mind:

If **you are a user located in the European Union (EU)**. Remember that TRADING PRODUCE LLC complies with the General Data Protection Regulation - RGPD 679/2016, for being "responsible for treatment" or

SECOND CHAPTER: PROCESSING OF PERSONAL DATA

WE WANT YOU TO UNDERSTAND THE TYPE OF INFORMATION WE COLLECT WHILE YOU USE OUR SERVICES AND THE PROCEDURE WE FOLLOW WITH THE DATA COLLECTED. LIKewise, WHEN YOU ENTER OUR PLATFORM, REMEMBER THAT YOU AUTHORIZE IN AN INFORMED, FREE AND VOLUNTARY MANNER FOR THE PROCESSING OF YOUR DATA.

What personal data do we collect?

The information we collect when you visit our platform belongs to two categories: the first is "Personal Information", which allows us to identify you, such as your name, and the second is "Aggregated Information", information that does not allow us to identify you, for example, the frequency of visits to our platform. At a general level, TRADING PRODUCE LLC collects personal data of a public and semi-private nature such as:

- General and specific identification data.
- Location data related to business activity.
- Financial and credit data.
- General data related to social security to confirm that you are of legal age or that you are legally constituted under the laws of a State and prevent fraud.
- Personal data for access to information systems: users, IP, passwords, profiles.

Next, we share more details of the information collected:

Personal information you provide to us: First name, last name, mailing or shipping address, personal identification number, social security number, telephone number, email address, voice and audio information when using audio features. Date of birth to verify that you are of legal age. Any personal information you choose to add to your profile, such as a picture. Personal information that you may choose to submit to us through questions or comments, or other information through similar activities.

Payment information: We may collect your credit or debit card number, username depending on the region in which you are located, limiting ourselves to the laws that regulate the matter. Likewise, this will depend on the eventual incorporation of a payment gateway on our platform.

Information for creating your account on our platform: Username and password, collectively referred to as "account information". Remember that the Terms and Conditions offer you more information about how your account works, so we invite you to read them carefully.

Information about your location: When you activate and configure your device with our platform, there is information that we may collect regarding your location. The data we collect when you connect with us is:

- Number of users and sessions
- Session duration
- Operating systems
- Device models
- Geographic area

We also want to tell you that this process is developed in conjunction with Google Analytics, in such a way that the location information of our visitors is made every time the user enters our platform, in this case Google Analytics allows us to identify the country and the city from which our users come.

Information from your devices when you use our services.

It is important that you know that our system may record some information about our visiting users from the different devices they use when they enter our platform, such as:

- From your computer or device we may collect IP addresses, unique device identifiers, processing capabilities, manufacturer and model, language and other regional settings, geographic location, and other similar settings.

- We may use technologies such as cookies and our own servers to help us collect and store this information, including log files. We explain this aspect more in the section on How do we collect information?
- We use certain cookies, web beacons and similar technologies to automatically collect, store and read files on your device, this helps us understand how you use our platform and allows us to personalize your experience. The data belongs to our database and these in turn are connected to the Google Analytics platform. These tools help us work to offer you our services more efficiently, as well as to capture usage information.

Here we define some terms that will help you better understand this part of our Policy:

- **Cookies:** These are small pieces of information that the online services you use place on your device for record keeping and identification purposes.
- **Web beacons:** These are transparent pixel images that allow online services to collect information about the ways you interact with them, for example, they tell us if you opened an email or clicked on an advertisement. Other similar technologies include tags, scripts, local shared objects (eg Flash cookies), local storage (e.g. HTML5), and related tools.
- **Hit:** These are the actions carried out within the platform when there is a landing page or also called a landing page to collect user data. That is, a visitor accesses a page with the tracking code installed, this Hit loads information such as: IP; Hit date and time; Browser version; Name of the page; For each new page accessed during navigation, a user can generate several Hits. This set of data sent by that same user is grouped into a session.
- **Session:** Set of Hits generated by a visitor. As an example: you as a user can access different services within our platform and carry out activities such as purchases in our store or other activities, so in those cases we will collect your information. Otherwise, that is, when you only watch but do not access any services, we will not collect your information.
- We want you to know that a cache is a component of your mobile device that transparently stores data with no record keeping penalties. Cache data identifies your mobile device. Most browsers and applications are initially configured to accept such data. If you prefer, remember that you can program your mobile device so that it does not store this information while you use our platform. Some features may only be available through the collection of such data. We may use such data to assist us in data collection and to track usage and trends that help us provide you with better service. We also allow third parties who have entered into confidentiality agreements access to such data in order to help us monitor the use of our platform for fraud or any other activity that does not comply with applicable laws.
- We may also collect specific data from our users such as:
 - Country (according to IP address).
 - Regional and language settings.
 - Network URL (not including URL parameters or payload content) and the following corresponding information.
 - Payload size in bytes.
 - Response times.
 - Duration of automatic traces.

- **Information about your activity on our platform:** Considering that this information is aggregated and does not identify you, TRADING PRODUCE LLC collects, uses, stores and transfers this information. For example, information when you visit our platform, certain information is collected automatically.

What is the treatment we give to the information we collect?

We inform you of the five stages of the data we collect:

1. Collection

In this first step, we obtain the data of our users respecting the principles and rights on data protection through our platform. Consequently, each personal data is processed after obtaining the informed consent of the user.

2. Storage

The data collected by TRADING PRODUCE LLC is stored with physical, technical, and administrative security measures, guaranteeing the principle of access and restricted circulation. The collected data may be stored:

- Directly on the computers of those responsible for the data storage processes of TRADING PRODUCE LLC.
- In physical files, under information access controls.
- On external servers in charge of third parties located inside or outside the country.

3. Use and Purpose

The Personal Data processed by TRADING PRODUCE LLC has different uses, among them are:

- a) Provide customer service to our users.
- b) Respond to queries and claims submitted by our users, authorities and non-exclusive third parties.
- c) Send administrative information to our users, such as changes in our terms, conditions and policies, as well as advertising information that we believe may be of interest to you.
- d) Ensure that our business operations comply with legal obligations in the place where the service is provided.
- e) Develop commercial activities that involve:
 - Analysis of data.
 - Data audits.
 - Supervision of information security.
 - Development, improvement or modification of our products and services.
 - Expansion of our business network and scale of operations.
- f) Keep the record and control of our users for the respective payments generated from or to TRADING PRODUCE LLC.
- g) Make reports of different areas of TRADING PRODUCE LLC in accounting, financial, legal, and similar aspects.

Among the purposes for which TRADING PRODUCE LLC justifies the use of data are:

- a) Manage what is pertinent for the development of the corporate purpose of TRADING PRODUCE LLC to fulfil the purpose of the contract entered into with the user.
- b) Allow the creation of an account and use of our Services.
- c) Develop, test, and improve our products and services by testing and troubleshooting new products and performance.
- d) Process orders and payments from users to TRADING PRODUCE LLC for the use of our services or from TRADING PRODUCE LLC to producers.
- e) Use certain features of the Services and other account and authentication information, billing, shipping, and contact details.
- f) Invite to events and offer new products and services.
- g) Manage procedures (Questions and claims).
- h) Carry out promotional accompaniment through a virtual channel.
- i) Provide contact information to the commercial force and/or distribution network, marketing, market research and any third party with whom TRADING PRODUCE LLC has a contractual relationship for the development of market research activities and their execution.
- j) Contact the user through telephone means to carry out studies and/or confirmation of personal data necessary for the execution of the contractual relationship.
- k) Contact the user through electronic means – social networks, chat Bot, Platform, video calls to confirm your identity, email, text messages and Push notifications that reach all devices that have our App, and other related for sending information related to the object of the contract concluded with the user.
- l) Transfer personal data both inside and outside the country to the parent company of TRADING PRODUCE LLC to comply with communication strategies and with the anti-money laundering regulations that apply to it.
- m) Transmit personal data to third parties with whom TRADING PRODUCE LLC has a contract and therefore acts in compliance with a contractual object, considering the limitations that may apply.
- n) Transmit the required data to the authorities that the law requires in compliance with the regulation.

4. Circulation

TRADING PRODUCE LLC communicates the personal data it processes to:

- a) To the subsidiaries and branches of TRADING PRODUCE LLC worldwide for the purposes described in number 3.
- b) To service providers including, but not limited to: website hosting, data analytics, information technology, infrastructure provision, customer service, email delivery, and auditing.
- c) To other companies with whom we collaborate regarding particular products or services, including our co-promotion partners for products that we jointly develop and market.
- d) For legal reasons, the data may circulate to the authorities of the places where TRADING PRODUCE LLC provides and offers its services following the processes required by the authorities. For example: (i) comply with a legal requirement, judicial proceeding, court order or legal process served on TRADING PRODUCE LLC; (ii) to investigate a possible crime, such as fraud or identity theft; (iii) in connection with the sale, purchase, merger, reorganization, liquidation, or dissolution of TRADING PRODUCE LLC; (iv) when we believe it is necessary to protect the rights, property, or safety of TRADING PRODUCE LLC or others; or (v) as required or permitted by law, including TRADING PRODUCE LLC's contractual obligations.

The access, use, preservation, or disclosure of the information is reasonably necessary to ensure compliance with the TRADING PRODUCE LLC Terms of Service, including investigation of possible violations; Detect, prevent, or otherwise address technical, fraud, or security issues; Protect against possible harm to the rights, property or safety of TRADING PRODUCE LLC, our users or the public as established or permitted by law.

5. Deletion

The deletion of the data is carried out once the cycle for which the data was requested has been completed, or in cases where the owner requests the deletion of their data, if the law authorizes it. TRADING PRODUCE LLC has a Deletion Policy in compliance with legislative standards and where the criteria for said deletion, data retention times, data expiration, complete and secure deletion, among others, are also established.

Thus, we store the data until it is no longer necessary to provide you with our services or until your account is deleted, whichever comes first. Remember that the actions to be taken depend on the particular case taking into account the nature of the data, the reason for the collection or treatment, and the relevant operational or legal retention needs.

As with any erasure process, tasks such as routine maintenance, unexpected outages, errors, or failures in our protocols may cause process and time delays.

AUTHORIZATION FOR THE PROCESSING OF PERSONAL DATA

TRADING PRODUCE LLC requests free, prior, express, and duly informed authorization from all its users and data owners to collect their data. For this, we have suitable mechanisms to allow the verification of the granting of said authorization. The same may be recorded in any medium, whether it is a physical document, electronic or in any format that guarantees its subsequent consultation, through technical tools, complying with the requirements established by law. This mechanism will always be clear on our platform.

PROTECTION MEASURES

We have implemented technical, legal, human, and administrative measures necessary to ensure the security of personal data, protecting its confidentiality, integrity, use, and preventing unauthorized and/or fraudulent access.

We have also implemented mandatory security protocols for all staff with access to personal data and information systems. The internal security policies under which the owner's information is kept to prevent its adulteration, loss, consultation, use or unauthorized or fraudulent access, are the following:

- 1) Personal Data Processing Policies.
- 2) Confidentiality clauses in employment contracts.
- 3) Authorizations for data processing in the formats and spaces where Personal Data is captured.

CHAPTER THREE: RIGHTS OF PERSONAL DATA HOLDERS

WE HAVE DESIGNED A SIMPLE LIST FOR YOU TO KNOW YOUR RIGHTS AS A DATA HOLDER AND THE PROCESS FOR YOU TO MAKE THEM EFFECTIVE WITH TRADING PRODUCE LLC.

What are the rights of the holder of personal data?

Below, we have listed your rights with their content so that you know them:

- **Right of access.** You have the right to obtain access to your personal data.

- **Right of rectification.** You have the right to obtain rectification of your personal data without undue delay when such personal data is inaccurate or incomplete.
- **Right of cancellation.** You have the right to obtain the erasure of your personal data without undue delay in certain circumstances, such as when the personal data is no longer necessary in relation to the purposes for which it was collected or processed.
- **Right to restriction.** You have the right to obtain the restriction of the processing that we carry out on your personal data in certain circumstances, such as when you contest the accuracy of the personal data, for a period that allows us to verify the accuracy of that personal data.
- **Right to portability.** You have the right to portability that allows you to easily move, copy or transfer personal data from one organization to another.
- **Right of opposition.** You have the right to object to processing based on legitimate interests and direct marketing.

What is the procedure to exercise the rights of the holder of personal data?

We have designed a procedure for our "users", "government or administrative entities in the exercise of their legal functions" and non-exclusive third parties to present their queries and claims. That is why we have provided the email requestorders@trading-produce.com in the subject you must indicate the word CONSULTATION or CLAIM, as you decide, additionally, you must and identify the following information:

- Full names and surnames.
- Type and identification number.
- Home address.
- Telephone contact.
- Email.
- The information necessary to process your request.
- Data relating to the company or business

In case it is a CLAIM, you must attach the documents that allow you to support or prove your request. In case you are a minor, you must submit the request through a responsible adult, without TRADING PRODUCE LLC denying the exercise of your rights at any time.

CHAPTER FOUR: FINAL PROVISIONS

FINALLY, WE PRESENT YOU BELOW SOME ADDITIONAL DETAILS THAT YOU SHOULD TAKE INTO ACCOUNT.

Permanent measures

In the processing of personal data, TRADING PRODUCE LLC will permanently verify its processes, protocols, procedures, and policies to guarantee the right to due processing of personal data.

Policy Binding

All our "users", employees, suppliers, contractors, and any owner who has any commercial or contractual relationship with TRADING PRODUCE LLC must voluntarily abide by this policy and the internal manuals that may exist for its effective compliance.

Compliance with the principles for the Processing of Personal Data

TRADING PRODUCE LLC guarantees the principles of legality, purpose, freedom, veracity or quality, transparency, restricted access and circulation, security, confidentiality, and other principles regarding the data contained in the TRADING PRODUCE LLC databases.

Policy Officer

We are responsible for this policy, TRADING PRODUCE LLC is located in Delaware, 108 West 13tg Street, Wilmington, county or New Castle, United States and our email is requestorders@trading-produce.com PRODUCE LLC.com.

TRADING PRODUCE LLC is a corporation incorporated under Delaware rules.

Policy Approval Date and Effective Date

This policy went into effect in January 2022.