

Privacy Policy

Responsible.

SWIRVLE SA de CV (hereinafter the "**Responsible**") with conventional address located at Ave . Luis Donaldo Colosio No .- 500 -a barrio san Luis en ciudad solidaridad Monterrey Nuevo León . C.P . 64100 .], email hola@swirvle.com, We are aware that you as a visitor to our offices and/or website, consumer or potential consumer of our products and/or services have the right to know what information we collect from you and our practices in relation to said information.

The conditions contained herein are applicable to the information that is collected on behalf of and by the Controller or any of its affiliated or subsidiary companies, by any means, including through or any website operated by the Controller.

Personal information

The personal data that the Responsible Party may collect directly or indirectly consist of the following: The personal data considered as identification are all those related to the identification of the person (full name, address, landline and/or cell phone, company for which you work, fingerprints, date of birth, nationality, place of birth, occupation and/ or your direct relatives). We promise that all the data obtained will be treated under the strictest security measures that guarantee its confidentiality.

Purposes

The main purpose for which we collect your data is to sell products, send promotions, personalize promotions / advertisements, market research, sale of market research.

The secondary purposes for which we collect your data are: billing, informing you about new products, services or changes in them, promotional messages; evaluate the quality of the service; comply with the obligations derived from the provision of the service; comply with current applicable legislation; respond to requests for information from any authority, whether for investigations, statistics or regulatory reports; attend to your comments related to the provision of services; send notices and information about our services; and contribute to the process of continuous improvement.

Transfers and Processors of Personal Data

Likewise, we inform you that your personal data may be transferred to third parties and may be shared with persons in charge for their treatment inside and outside the country, by persons other than the Responsible, who will issue the instructions for their treatment. In this sense, your information may be transferred or shared with (i) Various professionals, technicians and assistants, as well as other private entities for subrogated services in relation to customer service; (ii) Loyalty program administrators; (iii) Business partners of the Controller, in order for them to manage and operate complementary services to those of the Controller; (iv) Companies or third parties that operate jointly with the Controller any product, service or any software or IT infrastructure that serves as a platform for carrying out operations or services; (v) Third-party providers of services or sellers of products necessary for the operation of the person in charge, as well as commission agents that carry out operations or provide services to the person in charge that it may carry out in accordance with current legislation and its bylaws, such as, among others, commission agents, data processors, marketing material delivery companies, courier companies, security companies, securities transport companies, advertising agencies, information guards, with the purpose that they assist in carrying out the purposes set forth in this privacy notice; (vi) Professionals, advisors or external consultants, for the purpose of managing sales operations, services and other acts that the person in charge may carry out in accordance with current legislation and its bylaws, as well as for the defense of their interests. before any legal controversy that arises due to said operations and services, such as collection agencies, external, legal, accounting auditors, etc.; and (vii) All those governmental and/or judicial dependencies that by ministry of law request and/or require personal data of their clients and/or relatives from the person in charge, necessary for compliance with various legislations.

If you do not express your opposition for your personal data to be transferred, it will be understood that you have given your consent for it.

The Responsible informs that all contracts for the provision of services with third parties that involve the processing of your personal information in the name and on behalf of the Responsible will include a clause guaranteeing that they grant the level of protection of personal data, through which they are constituted in charge in terms of the previous paragraph. In any case, all handling of personal data will be carried out in compliance with the Federal Law on Protection of Personal Data Held by Private Parties (hereinafter the "**Law**") and its Regulations.

The information you provide must be true and complete. Therefore, the veracity of the data provided is under your responsibility and in no case will the Responsible be responsible in this regard.

Cookies

In order to offer you a more personalized and responsible service, we store information about how you use this website. This is done using a small text file called a cookie. Cookies contain small amounts of information and are downloaded to your computer or other device by a server of this website. Your browser sends these cookies back to this website on each subsequent visit so that it can recognize you and remember things like user preferences. You can find more detailed information about cookies and their operation at <http://www.aboutcookies.org>.

Each time this website is used, information may be stored through the use of cookies and other technologies. By using this website, you agree to the use of cookies, as described in this privacy notice and our terms and conditions, as well as to the use of cookies in other country, region or specific websites contained in swirlle.com and subdomains, as described in this privacy notice.

Modifications to the Privacy Policy

The Responsible Party reserves the right to make modifications or updates to this privacy notice at any time, for the attention of new legislation or jurisprudence, internal policies, new requirements for the provision or offering of our services and market practices, any modification to the Privacy Notice will be available through our Web portal; "privacy notice" section.

This Privacy Notice has been modified on December 07, 2020.