SAXUM Engineered Solutions

PRIVACY POLICY

1. Introduction

SAXUM Engineering ("SAXUM," "we," "us," or "our") values your privacy and is committed to protecting your personal information. This Privacy Policy describes how we collect, use, disclose, transfer, and protect your information when you visit our website (www.saxum.us), use our services, or interact with us (collectively, the "Services"). This Privacy Policy applies to all visitors and users of our Services, regardless of their geographic location. By accessing or using our Services, you acknowledge that you have read and understood this Privacy Policy and agree to the data practices described in it. IF YOU DO NOT AGREE WITH THIS POLICY, DO NOT ACCESS OR USE OUR SERVICES.

2. Information We Collect

We may collect personal and non-personal information about you through various sources, including, but not limited to:

• Information you provide to us directly:

- Contact Information: First name, last name, email address, phone number, company name, job title, postal address, country of residence, and any other information you provide when completing forms on our website, subscribing to newsletters, requesting information, or communicating with us.
- Communications: Records of your correspondence with us, including emails, chats, and phone calls.
- Feedback and Surveys: Information you provide when participating in surveys or providing feedback about our services.

• Information we collect automatically:

- Technical Information: IP address, browser type, operating system, URL, Internet Service Provider (ISP), device type, website usage data (pages visited, time spent, links clicked), server log data, and other similar information.
- Location Data: Information about your approximate geographic location derived from your IP address or, with your consent, more precise location information obtained through your mobile device.
- Cookies and Tracking Technologies: We use cookies, web beacons, pixel tags, and other similar technologies to collect information about your browsing activity and preferences.

Information we obtain from third parties:

- Public Sources: Information publicly available on the internet (e.g., social media profiles).
- Business Partners: Information provided by our business partners, such as contact information or demographic data.



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• **Commercial Information:** Project details, service inquiries, contractual data, customer communications, billing and payment information.

3. How We Use Your Information

We use the information collected for the following purposes:

• To Provide, Operate, and Improve our Services:

- o To provide and improve our engineering services.
- o To personalize your experience with our Services.
- o To develop new products and services.
- o To perform data analysis to improve our Services.

• To Communicate with You:

- o To respond to inquiries, project requests, and customer support needs.
- To send company updates, marketing materials, or other relevant communications (with the option to opt-out, as described below).
- o To inform you about changes to our Services or to this Privacy Policy.

• For Legitimate Business Purposes:

- o To administer and protect our business and website.
- o To conduct research and analysis.
- o To personalize the advertising we show you.
- o To measure the effectiveness of our marketing campaigns.

• To Comply with Legal and Regulatory Obligations:

- o To comply with applicable laws and regulations.
- o To respond to legal requests and processes.
- To protect our legal rights and interests.

• For Security and Fraud Prevention:

- To detect, prevent, and address fraud, abuse, and security incidents.
- **Combination of Information**: We may combine the information we collect from you through different sources to improve our Services and provide you with a more personalized experience.

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4. Sharing of Information

We do not sell or rent personal information. However, we may share your information with the following categories of recipients:

- Service Providers and Partners: Third-party companies that provide services to us to support
 our business operations, including, but not limited to, website hosting, IT services, payment
 processing, marketing, data analytics, customer support, and email services. These service
 providers are prohibited from using your personal information for any purpose other than
 providing the contracted services to us.
- **Affiliates:** We may share your personal information with our affiliated companies, which are subject to this Privacy Policy or similar policies that protect your privacy.
- **Professional Advisors:** We may disclose your personal information to our professional advisors, such as lawyers, accountants, and auditors.
- Legal and Regulatory Authorities: We may disclose your personal information to legal and regulatory authorities if we are required to do so by law or in response to a valid legal request, such as a court order or subpoena.
- Business Transfers: In the event of a merger, acquisition, reorganization, sale of assets, or similar event, your information may be transferred to the successor entity. In this case, we will notify you by email and/or through prominent notice on our website of any change in ownership or control of your personal information.
- **With Your Consent:** We may share your personal information with third parties if we have your explicit consent to do so.
- **Aggregated and Anonymized Data:** We may share aggregated or anonymized data that does not directly identify you with third parties for research, analysis, or marketing purposes.

5. Data Security

We implement appropriate technical and organizational security measures designed to protect your personal information against unauthorized access, disclosure, alteration, or destruction, as well as against accidental loss. These measures include, but are not limited to:

- The use of firewalls and intrusion detection systems.
- The encryption of sensitive data in transit and at rest.
- Physical access controls to our data centers.
- Training our employees in security and privacy practices.
- Periodic reviews of our security policies and procedures.

However, please be aware that no internet-based system is completely secure, and we cannot guarantee absolute security for your information. In the event of a data security breach, we will notify you in accordance with applicable laws.



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6. Your Rights and Choices

Subject to applicable laws in your jurisdiction, you may have the following rights with respect to your personal information:

- **Right of Access:** You have the right to request access to the personal information we hold about you.
- **Right to Rectification:** You have the right to request that we correct any inaccurate or incomplete personal information we hold about you.
- Right to Erasure (Right to be Forgotten): You have the right to request that we delete your personal information, under certain circumstances.
- Right to Restriction of Processing: You have the right to request that we restrict the processing
 of your personal information, under certain circumstances.
- Right to Data Portability: You have the right to receive your personal information in a structured, commonly used, and machine-readable format, and to transmit it to another controller, where technically feasible.
- **Right to Object:** You have the right to object to the processing of your personal information, under certain circumstances, including processing for direct marketing purposes.
- Right to Withdraw Consent: If we have collected and processed your personal information
 with your consent, you have the right to withdraw your consent at any time. The withdrawal
 of your consent will not affect the lawfulness of any processing we carried out before your
 withdrawal.
- **Right to Lodge a Complaint:** You have the right to lodge a complaint with a data protection supervisory authority if you believe that we have infringed your data protection rights.

7. Data Retention

We retain your personal information for as long as necessary to fulfill the purposes described in this Privacy Policy, unless a longer retention period is required or permitted by law. The criteria we use to determine retention periods include:

- The length of time we have an ongoing relationship with you.
- Whether there is a legal obligation to retain the data.
- Whether retention is advisable in light of our legal position (such as in regard to applicable statutes of limitations, litigation, or regulatory investigations).

8. International Data Transfers

Your personal information may be transferred to and processed in countries other than your country of residence, including countries that may not have data protection laws equivalent to those in your country. When we transfer your personal information to other countries, we will take steps to ensure that your information is protected in accordance with this Privacy Policy and applicable laws, such as



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by using standard contractual clauses approved by the European Commission or relying on approved transfer mechanisms, such as the EU-U.S. Privacy Shield (if applicable).

9. Third-Party Links

Our website may contain links to third-party websites that are not owned or controlled by us. We are not responsible for the privacy practices of these websites, and we encourage you to review their privacy policies before providing them with any personal information.

10. Changes to this Policy

We may update this Privacy Policy from time to time to reflect changes in our information practices. We will post any changes on this page and update the "Effective Date" at the top of the Policy. If we make material changes to this Policy, we will notify you by email (sent to the email address specified in your account) or by means of prominent notice on our website prior to the change becoming effective. We encourage you to review this Privacy Policy periodically to be informed of how we are protecting your information.

11. Contact Information

If you have any questions or concerns regarding this Privacy Policy, please contact us at:

SAXUM Engineering

Address: Marcial Imbaud 35, Yerba Buena, Tucumán

Phone: +54 0381 4874929 Email: Carolina.ramallo@saxum.us

Date	Rev.	Change History	Authorised by
12/01/2023	00	Creation	Legal