

Inverso Sales - Privacy Policy

EFFECTIVE DATE: May 15, 2023

1. INTRODUCTION

Inverso Sales (“Inverso,” “us” or “we”) is committed to protecting the privacy of our customers and end users. This Privacy (“Policy”) explains how we collect, share, and use personal information collected through our corporate websites (and marketplaces within the Inverso Sales Site) (the “Sites”) and any related Inverso Sales application, marketplace service or tool (collectively, the “Services”), as well as in connection with our events, sales, and marketing activities. “You” or “your” means the individual using the Services and the entity which such individual represents.

This policy also explains the rights of California residents regarding the collection, use, sale, and sharing of their personal information under the California Consumer Privacy Act of 2018 (CCPA), as amended by the California Privacy Rights Act of 2020 (CPRA). We may update and make changes to this policy, so we encourage you to review it periodically.

If you have any questions or concerns about our use of your personal information, then please contact us using the contact details provided at the bottom of this Policy.

2. ABOUT US

Inverso Sales is registered Company with registration number 1071425-0010 in Puerto Rico, located at 53 Palmeras Street #601 San Juan Puerto Rico, 00901. Inverso, by definition, means Reverse. The series of actions taken to recapture value and put an end to a product's lifecycle are known as reverse logistics. So, we are a company called Inverso Sales and we offer manufacturers an automated sales solution. We offer solutions for B2B online marketplaces and related services that make it easier for manufacturers to sell inventory and increase dollar recovery.

For more information about us, please see the “About Us” section of our Site at www.inversosales.com.

3. KEY TERMS

Our support	Our customer Support will guide you for any questions related to your data privacy. The questions or can be shared to support@inversosales.com .
Personal information	Any information that identifies, relates to, describes, is reasonably capable of being associated with, or could reasonably be linked with a particular consumer or household.
Sensitive personal information	Personal information revealing a consumer's social security number, driver's license, account numbers and credentials, precise geolocation, racial or ethnic origin, religious beliefs, or union membership, personal information concerning a consumer's health, sex life, or sexual orientation, contents of a consumer's mail, email and text messages where the business is not the intended recipient, genetic data, and biometric information.

4. PERSONAL INFORMATION WE COLLECT ABOUT YOU.

In the preceding 12 months, we have collected the following categories and specific types of consumer personal information:

Categories of Personal Information	Specific Types of Personal Information Collected
Identifiers	your real name, alias, postal address, unique personal identifier, online identifier, Internet Protocol address, email address, or other similar identifiers
Information that identifies, relates to, describes, or is capable of being associated with, a particular individual	your name, your physical address, contact number, fax number, business resale certificate number, password chosen by You to access the services from our website, bank account number or credit card number, debit

	card number or any other financial information as required
Internet or other electronic network activity information	browsing history, search history, and information regarding your interaction with an Internet Web site, application, or advertisement
Geolocation data	geographic location (e.g., country or city-level location)
Inferences drawn from any of the information identified above to create a profile about a consumer reflecting the consumer's preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes	The profile is created once you provide us with the above mentioned information
Sensitive Personal Information	Precise location data

We do not, however, knowingly collect personal information from children under the age of thirteen.

5. HOW YOUR PERSONAL INFORMATION IS COLLECTED.

We collect most of this personal information directly from you—in person, by telephone, text or email and/or via our website. However, we may also collect information from the following categories of sources:

- Publicly accessible sources (eg. tradeshow events that you've registered for);
- Third party (e.g., sanctions screening providers, credit reporting agencies, customer due diligence providers, advertising networks, internet service providers, social networks, data analytics providers, government entities, and data brokers;
- Third party with your consent (e.g., your bank);
- Cookies on our website;
- Automated information collection;
- Our IT systems, including:
 - o Automated monitoring of our websites and other technical systems, such as our computer networks and connections, CCTV and access control systems, communications systems, email and instant messaging systems; and

o any other relevant systems which we may incorporate in future for the smooth process of the work after notifying you through changes in this policy.

6. WHY WE USE YOUR PERSONAL INFORMATION.

We collect, and may sell and/or share consumer personal information for the following business purposes:

- Auditing related to counting ad impressions to unique visitors, verifying positioning and quality of ad impressions, and auditing compliance with this specification and other standards;
- Helping to ensure security and integrity to the extent the use of the consumer's personal information is reasonably necessary and proportionate for these purposes;
- Debugging to identify and repair errors that impair existing intended functionality;
- Short-term, transient use, including, but not limited to, non-personalized advertising shown as part of a consumer's current interaction with the business, provided the consumer's personal information is not disclosed to another third party and is not used to build a profile about the consumer or otherwise alter the consumer's experience outside the current interaction with the business;
- Performing services on behalf of the business, including maintaining or servicing accounts, providing customer service, processing or fulfilling orders and transactions, verifying customer information, processing payments, providing financing, providing analytic services, providing storage, or providing similar services on behalf of the business or service provider;
- Providing advertising and marketing services, except for cross-context behavioral advertising, to the consumer;
- Undertaking internal research for technological development and demonstration;
- Undertaking activities to verify or maintain the quality or safety of a service or device that is owned, manufactured, manufactured for, or controlled by the business, and to improve, upgrade, or enhance the service or device that is owned, manufactured, manufactured for, or controlled by the business;
- To comply with our legal and regulatory obligations;
- For the performance of our contract with you or to take steps at your request before entering into a contract;

- For our legitimate interests or those of a third party; or
- Where you have given consent.

A legitimate interest is when we have a business or commercial reason to use your information, so long as this is not overridden by your own rights and interests.

What we use your personal information for	Our reasons
To provide products AND/OR services to you	For the performance of our contract with you or to take steps at your request before entering into a contract
To prevent and detect fraud against you or the company	For our legitimate interests or those of a third party, i.e. to minimize fraud that could be damaging for us and for you
Conducting checks to identify our customers and verify their identity Screening for financial and other sanctions or embargoes Other processing necessary to comply with professional, legal and regulatory obligations that apply to our business	To comply with our legal and regulatory obligations
Gathering and providing information required by or relating to audits, enquiries or investigations by regulatory bodies	To comply with our legal and regulatory obligations
Ensuring business policies are adhered to, e.g. policies covering security and internet use	For our legitimate interests or those of a third party, i.e. to make sure we are following our own internal procedures so we can deliver the best service to you
Operational reasons, such as improving efficiency, training and quality control	For our legitimate interests or those of a third party, i.e. to be as efficient as we can so we can deliver the best service for you at the best price

Ensuring the confidentiality of commercially sensitive information	<p>For our legitimate interests or those of a third party, i.e. to protect trade secrets and other commercially valuable information</p> <p>To comply with our legal and regulatory obligations</p>
Statistical analysis to help us manage our business, e.g. in relation to our financial performance, customer base, product range or other efficiency measures	<p>For our legitimate interests or those of a third party, i.e. to be as efficient as we can so we can deliver the best service for you at the best price</p>
Preventing unauthorized access and modifications to systems	<p>For our legitimate interests or those of a third party, i.e. to prevent and detect criminal activity that could be damaging for us and for you</p> <p>To comply with our legal and regulatory obligations</p>
Updating and enhancing customer records	<p>For the performance of our contract with you or to take steps at your request before entering into a contract</p> <p>To comply with our legal and regulatory obligations</p> <p>For our legitimate interests or those of a third party, e.g. making sure that we can keep in touch with our customers about existing orders and new products</p>
Statutory returns	<p>To comply with our legal and regulatory obligations</p>
Ensuring safe working practices, staff administration and assessments	<p>To comply with our legal and regulatory obligations</p> <p>For our legitimate interests or those of a third party, e.g. to make sure we are following our own internal procedures and working efficiently so we can deliver the best service to you</p>

Marketing our services [and those of selected third parties] to: <ul style="list-style-type: none"> 🕒 existing and former customers; 🕒 third parties who have previously expressed an interest in our services; 🕒 third parties with whom we have had no previous dealings. 	For our legitimate interests or those of a third party, i.e. to promote our business to existing and former customers
Credit reference checks via external credit reference agencies	For our legitimate interests or those of a third party, i.e. to ensure our customers are likely to be able to pay for our products and services
External audits and quality checks, e.g. for ISO or Investors in People accreditation and the audit of our accounts	For our legitimate interests or those of a third party, i.e. to maintain our accreditations so we can demonstrate we operate at the highest standards To comply with our legal and regulatory obligations

The above table does not apply to special category personal information, which we will only process with your explicit consent.

7. WHO WE SHARE YOUR PERSONAL INFORMATION WITH.

We may have to sell or shared consumers' personal information with:

- Our affiliates, including companies within the Inverso Sales group;
- Service providers we use to help deliver our products and to you, such as payment service providers, warehouses and delivery companies;
- Other third parties we use to help us run our business, such as marketing agencies or website hosts;
- Third parties approved by you, including social media sites you choose to link your account to or third-party payment providers;
- Credit reporting agencies;
- Our insurers and brokers;

- Our bank[s];
- External auditors;

We only allow our service providers to handle your personal information if we are satisfied, they take appropriate measures to protect your personal information. We also impose contractual obligations on service providers, contractors, and third parties to ensure they can only use your personal information to provide services to us and to you.

We may disclose and exchange information with law enforcement agencies and regulatory bodies to comply with our legal and regulatory obligations.

We may also need to share some personal information with other parties, such as potential buyers of some or all of our business or during a re-structuring. We will typically anonymize information, but this may not always be possible. The recipient of the information will be bound by confidentiality obligations.

8. CATEGORIES OF PERSONAL INFORMATION WE DISCLOSED FOR A BUSINESS PURPOSE.

We may have to disclose the following categories of personal information for a business purpose:

- Identifiers (e.g., a real name, alias, postal address, unique personal identifier, online identifier, Internet Protocol address, email address, account name, or other similar identifiers);
- Information that identifies, relates to, describes, or is capable of being associated with, a particular individual, including, but not limited to, his or her name, information about your winning bid and/or to confirm your purchases to entities who require such information (to ensure successful fulfilment of any purchases you make through the Services), physical characteristics or description, address, telephone number, bank account number, credit card number, debit card number, or any other financial information;
- Commercial information (e.g., products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies);
- Internet or other electronic network activity information (e.g., browsing history, search history, and information regarding a consumer's interaction with an Internet Web site, application, or advertisement);
- Geolocation data;

- Audio, electronic, visual, thermal, olfactory, or similar information;
- Professional or employment-related information;
- Inferences drawn from any of the information identified above to create a profile about a consumer reflecting the consumer's preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes.
- Sensitive personal information

9. HOW LONG YOUR PERSONAL INFORMATION WILL BE KEPT

We will keep your personal information while you have an account with us or while we are providing products to you. Thereafter, we will keep your personal information for as long as is necessary:

- To respond to any questions, complaints or claims made by you or on your behalf;
- To show that we treated you fairly; or
- To keep records required by law.

We will not retain your personal information for longer than necessary for the purposes set out in this policy. Different retention periods apply for different types of personal information

When it is no longer necessary to retain your personal information, we will delete or anonymize it.

10. YOUR RIGHTS UNDER THE CCPA/CPRA.

You have the right under the California Consumer Privacy Act of 2018 (CCPA), as amended by the California Privacy Rights Act of 2020 (CPRA), and certain other privacy and data protection laws, as applicable, to exercise free of charge:

Disclosure of Personal Information We	You have the right to know, and request
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Collect About You	disclosure of:
	• The categories of personal information we have collected about you, including sensitive personal information;
	• The categories of sources from which the personal information is collected;
	• Our business or commercial purpose for collecting, selling, or sharing personal information;
	• The categories of third parties to whom we disclose personal information, if any; and
	• The specific pieces of personal information we have collected about you.
	Please note that we are not required to:
	• Retain any personal information about you that was collected for a single one-time transaction if, in the ordinary course of business, that information about you is not retained;
	• Reidentify or otherwise link any data that, in the ordinary course of business, is not maintained in a manner that would be considered personal information; or
	• Provide the personal information to you more than twice in a 12-month period.
Disclosure of Personal Information Sold, Shared, or Disclosed for a Business Purpose	In connection with any personal information we may sell, share, or disclose to a third party for a business purpose, you have the right to know:
	<ul style="list-style-type: none"> • The categories of personal information about you that we sold or shared and the categories of third parties to whom the personal information was sold or shared; and • The categories of personal information that we disclosed about you for a business purpose and the categories of persons to whom the personal information was disclosed for a business purpose. <p>You have the right to opt-out of the sale of your personal information or sharing of your</p>

	<p>personal information for the purpose of targeted behavioral advertising. If you exercise your right to opt-out of the sale or sharing of your personal information, we will refrain from selling or sharing your personal information, unless you subsequently provide express authorization for the sale or sharing of your personal information.</p> <p>To opt-out of the sale or sharing of your personal information, you can email us at support@inversosales.com with the subject, “Opt-out of the Sale or Sharing of my Personal Information”.</p>
<p>Right to Limit Use of Sensitive Personal Information</p>	<p>You have the right to limit the use and disclosure of your sensitive personal information to the use which is necessary to:</p> <ul style="list-style-type: none"> • Perform the services or provide the goods reasonably expected by an average consumer who requests those goods or services; • To perform the following services: (1) Helping to ensure security and integrity to the extent the use of the consumer's personal information is reasonably necessary and proportionate for these purposes; (2) Short-term, transient use, including, but not limited to, non-personalized advertising shown as part of a consumer's current interaction with the business, provided that the consumer's personal information is not disclosed to another third party and is not used to build a profile about the consumer or otherwise alter the consumer's experience outside the current interaction with the business; (3) Performing services on behalf of the business, including maintaining or servicing accounts, providing customer service, processing or fulfilling orders and transactions, verifying customer information, processing payments, providing financing, providing analytic services,

	<p>providing storage, or providing similar services on behalf of the business; and (4) Undertaking activities to verify or maintain the quality or safety of a service or device that is owned, manufactured, manufactured for, or controlled by the business, and to improve, upgrade, or enhance the service or device that is owned, manufactured, manufactured for, or controlled by the business; and</p> <ul style="list-style-type: none"> • As authorized by further regulations <p>You have a right to know if your sensitive personal information may be used, or disclosed to a service provider or contractor, for additional, specified purposes.</p> <p>To limit the use of your sensitive personal information, you can email us at support@inversosales.com with subject "Limit the Use of My Sensitive Personal Information".</p>
Right to Deletion	<p>Subject to certain exceptions set out below, on receipt of a verifiable request from you, we will:</p> <ul style="list-style-type: none"> • Delete your personal information from our records; and • Direct any service providers or contractors to delete your personal information from their records. • Direct third parties to whom the business has sold or shared your personal information to delete your personal information unless this proves impossible or involves disproportionate effort. <p>Please note that we may not delete your personal information if it is reasonably necessary to:</p> <ul style="list-style-type: none"> • Complete the transaction for which the personal information was collected, fulfill the

	<p>terms of a written warranty or product recall conducted in accordance with federal law, provide a good or service requested by you, or reasonably anticipated within the context of our ongoing business relationship with you, or otherwise perform a contract between you and us;</p> <ul style="list-style-type: none"> • Help to ensure security and integrity to the extent the use of the consumer's personal information is reasonably necessary and proportionate for those purposes; • Debug to identify and repair errors that impair existing intended functionality; • Exercise free speech, ensure the right of another consumer to exercise his or her right of free speech, or exercise another right provided for by law; • Comply with the California Electronic Communications Privacy Act; • Engage in public or peer-reviewed scientific, historical, or statistical research in the public interest that adheres to all other applicable ethics and privacy laws, when our deletion of the information is likely to render impossible or seriously impair the achievement of such research, provided we have obtained your informed consent; • Enable solely internal uses that are reasonably aligned with your expectations based on your relationship with us • Comply with an existing legal obligation; or • Otherwise use your personal information, internally, in a lawful manner that is compatible with the context in which you provided the information.
Right of Correction	<p>If we maintain inaccurate personal information about you, you have the right to request us to</p>

	<p>correct that inaccurate personal information. Upon receipt of a verifiable request from you, we will use commercially reasonable efforts to correct the inaccurate personal information.</p>
Protection Against Retaliation	<p>You have the right to not be retaliated against by us because you exercised any of your rights under the CCPA/CPRA. This means we cannot, among other things:</p> <ul style="list-style-type: none"> • Deny goods or services to you; • Charge different prices or rates for goods or services, including through the use of discounts or other benefits or imposing penalties; • Provide a different level or quality of goods or services to you; or • Suggest that you will receive a different price or rate for goods or services or a different level or quality of goods or services. <p>Please note that we may charge a different price or rate or provide a different level or quality of goods and/or services to you, if that difference is reasonably related to the value provided to our business by your personal information. We may also offer loyalty, rewards, premium features, discounts, or club card programs consistent with these rights or payments as compensation, for the collection of personal information, the sale of personal information, or the retention of personal information.</p>

11. HOW TO EXERCISE YOUR RIGHTS.

If you would like to exercise any of your rights as described in this Privacy Policy, you can do so here by emailing us at support@inversosales.com.

Please note that you may only make a CCPA/CPRA-related data access or data portability disclosure request twice within a 12-month period.

If you choose to contact us directly by email, you will need to provide us with:

- Enough information to identify you [(e.g., your full name, address and customer or matter reference number)];
- Proof of your identity and address (e.g., a copy of your driving license or passport and a recent utility or credit card bill); and
- A description of what right you want to exercise and the information to which your request relates.

We are not obligated to make a data access or data portability disclosure if we cannot verify that the person making the request is the person about whom we collected information, or is someone authorized to act on such person's behalf.

Any personal information we collect from you to verify your identity in connection with your request will be used solely for the purposes of verification.

FOR ALL THE RESIDENTS OF EUROPE – GDPR COMPLIANCE

12. TRANSFERRING YOUR PERSONAL DATA OUT OF THE EEA

To deliver services to you, it is sometimes necessary for us to share your personal information outside the European Economic Area (EEA), e.g.:

- 🕒 With our offices outside the EEA;
- 🕒 With your and our service providers located outside the EEA;
- 🕒 If you are based outside the EEA; or
- 🕒 Where there is an international dimension to the services, we are providing to you.

These transfers are subject to special rules under European data protection law.

The following countries to which we may transfer personal information have been assessed by the European Commission as providing an adequate level of protection for personal information: [The European Commission has so far recognized Andorra, Argentina, Canada (commercial organisations), Faroe Islands, Guernsey, Israel, Isle of Man, Japan, Jersey, New Zealand, Republic of Korea, Switzerland, the United Kingdom under the GDPR and the LED, and Uruguay as providing adequate protection.

Except for the countries listed above, these OR these non-EEA countries do not have the same data protection laws as the EEA. We will, however, ensure the transfer complies with data

protection law and all personal information will be secure. Our standard practice is to use standard data protection contract clauses that have been approved by the European Commission. To obtain a copy of those clauses by the European Commission. To obtain a copy of those clauses [https://commission.europa.eu/law/law-topic/data-protection/reform/rules-business-and-organisations_en].

If you would like further information, please contact [us OR] our Data Protection Officer (see “How To Contact Us” below).

13. INTERNATIONAL TRANSFERS OF YOUR PERSONAL DATA OUTSIDE THE EEA—IN MORE DETAIL

More details about the country outside the EEA to which your personal data is transferred are set out in the table below.

Recipient country	Recipient	Processing operation (use) by recipient	Lawful safeguard
USA	Inverso Sales is registered Company with registration number 1071425-0010 in Puerto Rico, located at 53 Palmeras Street #601 San Juan Puerto Rico, 00901	Use of data with legitimate interest, it is when we have a business or commercial reason to use your information, so long as this is not overridden by your own rights and interests, pursuant to below-mentioned clause 15	Legally-approved standard data protection clauses for transfers from a controller to a processor recognized or issued further to Article 46(2) of the EU GDPR To obtain a copy of the [e.g., standard data protection clauses], please contact us OR our Data Protection Officer] (see “How to contact us”)

14. TRANSFERRING YOUR PERSONAL DATA OUT OF THE AND EEA—FURTHER INFORMATION

If you would like further information about data transferred outside the EEA, please contact [us OR our Data Protection Officer] (see “How to Contact Us” below).

Your Rights

You have the following rights, which you can exercise free of charge:

Access	The right to be provided with a copy of your personal data
Rectification	The right to require us to correct any mistakes in your personal data
Erasure (also known as the right to be forgotten)	The right to require us to delete your personal data—in certain situations
Restriction of processing	The right to require us to restrict processing of your personal data—in certain circumstances, e.g., if you contest the accuracy of the data
Data portability	The right to receive the personal data you provided to us, in a structured, commonly used and machine-readable format and/or transmit that data to a third party—in certain situations
To object	<p>The right to object:</p> <ul style="list-style-type: none"> ⌚ at any time to your personal data being processed for direct marketing (including profiling) ⌚ in certain other situations to our continued processing of your personal data, e.g., processing carried out for the purpose of our legitimate interests unless there are compelling legitimate grounds for the processing to continue or the processing is required for the establishment, exercise or defense of legal claims
Not to be subject to automated individual decision-making	The right not to be subject to a decision based solely on automated processing (including profiling) that produces legal effects concerning you or similarly significantly affects you
Right to withdraw consents	<p>If you have provided us with a consent to use your personal data you have a right to withdraw that consent easily at any time</p> <p>You may withdraw consents by emailing us at support@inversosales.com for the same.</p> <p>Withdrawing a consent will not affect the lawfulness of our use of your personal data in reliance on that consent before it was withdrawn</p>

For more information on each of those rights, including the circumstances in which they apply, please contact us (see “How to Contact Us” below).

If you would like to exercise any of those rights, please:

- ⌚ Email or write to us—see below: “How to contact us” –and–
- ⌚ provide enough information to identify yourself (e.g., your full name, address and customer or matter reference number) and any additional identity information we may reasonably request from you
- ⌚ Let us know what right you want to exercise and the information to which your request relates

15. KEEPING YOUR PERSONAL DATA SECURE

We have appropriate security measures to prevent personal data from being accidentally lost, or used or accessed unlawfully. We limit access to your personal data to those who have a genuine business need to access it. Those processing your personal data will do so only in an authorized manner and are subject to a duty of confidentiality. We also have procedures to deal with any suspected data security breach. We will notify you and any applicable regulator of a suspected data security breach where we are legally required to do so.

16. HOW TO COMPLAIN?

Please contact us if you have any queries or concerns about our use of your personal data (see below “How to Contact Us”). We hope we will be able to resolve any issues you may have.

You also have the right to lodge a complaint with:

- ⌚ The lead supervisory authority in the EEA.
- ⌚ A relevant data protection supervisory authority in the EEA state of your habitual residence, place of work or of an alleged infringement of data protection laws in the EEA

17. CHANGES THIS PRIVACY POLICY

This privacy notice was published on 5/15/2023 and last updated on 5/15/2023.

We may change this privacy notice from time to time—when we do we will inform you via our website or other means of contact such as email.

18. HOW TO CONTACT US?

INDIVIDUALS IN THE EEA

Email to us at support@inversosales.com or write to us at:

Inverso Sales
53 Palmeras Street,
#601,
San Juan,
Puerto Rico, 00901