



# Privacy Policy

Document Control Information			
Version	3.0	Author	Tiana Dermendjieva GDPRLocal
Reviewer	Julio Elgueta	Review Date	June/2025
Review Frequency	12 months	Next Review Date	June/2026

*The current version of this document is up to date. Any future versions or changes to this document must also be approved by the author and the Executive Team and issued on a version-controlled basis under their signature. This document has been stored at Safe Storage.*

### **Privacy Statement Summary:**

This Privacy Policy outlines the way Sumadi S.A. (referred to as "we", "us", or "our") gathers, uses, and shares information when you use the Sumadi Website (the "Website"). This Policy applies where we are acting as a Data Controller, where we determine the purposes and means of the processing of that personal data.

<b>Who will use my data?</b>	Sumadi S.A.
<b>Who are we?</b>	We are Sumadi S.A., a leader in AI-powered proctoring solutions. We specialize in providing secure, automated proctoring for online assessments, using advanced technologies like facial and typing pattern recognition, authentication, and browser tracking. Our approach is defined by our commitment to flexibility and modularity, offering institutions a diverse range of solutions tailored to their needs, rather than a one-size-fits-all approach. Our aim is to ensure the highest standards of integrity in online assessments, making us a trusted choice for organizations.
<b>What for?</b>	<p>We will store and process your data from interactions on our website in order to allow us to provide our products and services. This includes:</p> <ul style="list-style-type: none"><li>- To register and communicate with users: We use Personal Identification Information to register individuals on our platform, deliver newsletters, and address inquiries.</li><li>- To optimize user experience: Usage Information is analyzed to understand user behavior on our website, ensuring content is relevant and the platform is user-friendly.</li><li>- To ensure website compatibility: Technical Data is employed to guarantee our website functions seamlessly across various devices and browsers, and to diagnose and resolve any technical issues.</li><li>- To personalize and analyze user interactions: Through Cookies and Tracking Data, we tailor user experiences by recalling preferences and login details. This data also aids in gauging website traffic and refining marketing initiatives.</li><li>- To enhance our services: Feedback and User Inputs are invaluable in guiding our service improvements, ensuring we cater to user suggestions and address any concerns.</li><li>- To communicate with clients: SUMADI uses client data to engage</li></ul>

	<p>with its partners and users, including sending updates about its solutions, promotional materials, and support communications.</p> <ul style="list-style-type: none"> <li>- To comply with legal and regulatory requirements: SUMADI may handle data to meet legal and regulatory demands, such as data protection regulations and other legal stipulations.</li> </ul> <p>Overall, SUMADI collects and processes data from our website interactions to deliver our products, enhance user experiences, and meet regulatory requirements. We prioritize data protection and have measures in place to safeguard personal information.</p>
<b>What will happen if I contact you?</b>	If you contact us, we will use your data to send you the information that you have requested and updates, and other information that we think you will be interested in. This may include a range of related products and services.
<b>What data will be stored?</b>	We will store your personal details in order to provide our services and run our company. This includes your contact details, company information, and in some cases financial information.
<b>What data will be shared?</b>	We will not share your data with any third parties other than as described here, to fulfil our obligations to you, operate and develop our company, and to protect our interests. We will only share any data that is particularly relevant to our process in order to provide the services that we offer. We may share your information with regulators or legal bodies that request it.
<b>How long?</b>	Your data will be stored only for as long as strictly necessary to provide our services, to meet our obligations to you and meet our legal obligations. For more information, please contact us about our Data Retention Policy.
<b>Who can access my data?</b>	We will never sell, share or otherwise distribute your data to any other third party other than as described here. Access to your data is carefully controlled.
<b>How is my data kept secure?</b>	We will store your data on secure servers. We use industry standard security protocols/technology to secure your data.

## About This Privacy Policy

This policy details how we handle information gathered from your interactions on our website. It covers the data you provide directly to us, the insights we gain from our online interactions, the information we gather about you from other online sources, and how we further utilize the data we already hold about you.

Privacy regulations prescribe the proper collection, handling, processing and storage of personal data. These rules apply regardless of whether data is stored electronically, on paper or on other materials. To comply with the law, personal information must be collected and used fairly, stored securely and not disclosed unlawfully. These data-protection requirements are built upon eight fundamental principles, which dictate that personal data must:

- Be processed fairly and lawfully;
- Be obtained only for specific, lawful purposes;
- Be adequate, relevant, and not excessive;
- Be accurate and kept up to date;
- Not be held for any longer than is necessary;
- Processed in accordance with the rights of the data subjects;
- Be protected in appropriate ways;
- Not be transferred outside the EU, unless that country or territory also ensures an adequate level of protection.

We take these responsibilities seriously; this document describes our approach to data protection.

This policy helps to protect us from data security risks, including:

- Breaches of confidentiality. For instance, information being given out inappropriately;
- Failing to offer choice. For instance, all individuals should be free to choose how the company uses data relating to them;
- Reputational damage. For instance, the company could suffer if hackers successfully gained access to sensitive data;
- Any other risks inherent in the collection, storage, or processing of your data.

## Who We Are And How To Contact Us

Sumadi, S.A., with its principal place of business at Corregimiento de Betania Urbanización Avenida Roosevelt, Calle 10, Edificio 10087 Local 3, 07095 Ciudad de Panamá, Provincia de Panamá, Panamá is the company responsible for collection, use and disclosure of your Personal Information under this Privacy Policy.

If you have any questions about this Privacy Policy, please contact us at [privacy@sumadi.net](mailto:privacy@sumadi.net) or at the postal address above. Because email communications are not always secure, please do not send sensitive information in your emails to us.

## If you are located in the EEA

We have appointed EU Representatives under **Article 27 of the EU GDPR**. Our appointed representative is:

Office of General Counsel

[privacy@sumadi.net](mailto:privacy@sumadi.net)

Tel: +507 66720677

Corregimiento de Betania Urbanización Avenida Roosevelt, Calle 10, Edificio 10087 Local 3, 07095 Ciudad de Panamá, Provincia de Panamá, Panamá

According to **Article 37 of the GDPR** we have appointed a Data Protection Officer (DPO). Our appointed DPO is:

GDPR Local Ltd

Adam Brogden

[contact@gdpr.com](mailto:contact@gdpr.com)

Tel + 441 772 217 800

GDPR Local Ltd

1st Floor Front Suite 27-29 North Street, Brighton England BN1 1EB

## Additional Information for Individuals in the EEA

If you are located in the EEA, you also may lodge a complaint with a data protection authority for your country or region or where an alleged infringement of applicable data protection law occurs and will assist in any investigation or request made by the appropriate authorities.

You can find the list at:

[https://ec.europa.eu/justice/article-29/structure/data-protection-authorities/index\\_en.htm](https://ec.europa.eu/justice/article-29/structure/data-protection-authorities/index_en.htm)

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Privacy Policy

Sumadi S.A. @2025

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## Who this privacy policy applies to

This policy pertains to data subjects interacting with Sumadi, S.A. website, including clients, customers, suppliers, partners, employees, and all other individuals. To offer our online products and services and manage our online operations, it's essential to process your data. The policy encompasses all data held by the company about identifiable individuals, even if it technically falls outside the scope of privacy regulations. This can include:

- Names of Individuals
- Contact details
- Postal addresses
- Email Addresses
- Telephone numbers
- And other information as required

## What this policy applies to

This section describes the lawful basis for processing your data and applies to the information about yourself that you choose to provide us with or that you allow us to collect. This includes:

- The Information you provide when you contact us
- When you contact us in order to discuss using our services
- Information we collect about how you use the website
- Information relating to services we offer to you and other transactions including financial and other personal information required to complete these transactions
- Information that is given and stored as part of our ongoing relationship
- Information we collect as a result of our interaction,
- The information we collect about you from other sources,
- or information we service about you by using the information we hold.

We do not routinely collect or process sensitive data about you. However, where this is the case we will ensure we take appropriate precautions to protect your data.

## How your information will be used

We will only use your personal data for the purposes for which we collected it and as you would reasonably expect your data to be processed and only where there is a lawful basis for such processing, for example:

Purpose/Activity	Type of data	Lawful basis for processing
To register you as a new customer	a. Identity b. Contact	a. Performance of a contract with you b. Consent
To process and deliver the products and services you request including digital signages, and to manage payments, fees and charges.	a. Identity b. Contact c. Financial d. Transaction e. Marketing and Communications	a. Performance of a contract with you b. Necessary for our legitimate interests to recover debts owed to us c. Consent
To manage our ongoing relationship with you which will include notifying you about changes to our terms, services or privacy policy, to maintain our records	a. Identity b. Contact c. Profile d. Marketing and Communications	a. Performance of a contract with you b. Necessary to comply with a legal obligation c. Necessary for our legitimate interests to keep our records updated and to study how customers use our services d. Consent
To administer and protect our business and our site (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	a. Identity b. Contact c. Technical	a. Necessary for our legitimate interests for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise b. Necessary to comply with a legal obligation c. Consent
To use data analytics to improve our website, services, marketing, customer relationships and experiences	a. Technical b. Usage	a. Necessary for our legitimate interests to define types of customers for our services, to keep our site updated and relevant, to develop our business and to inform our marketing strategy b. Consent

To make suggestions and recommendations to you about services that may be of interest to you	a. Identity b. Contact c. Technical d. Usage e. Profile	a. Necessary for our legitimate interests to develop our services and grow our business b. Consent
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We may collect and process information about you, including your name, address, date of birth, address, contact details (including email address and mobile phone number). We may take personal information from a range of sources.

We will use your data for the purpose it was collected and where we have your consent or an appropriate lawful basis may use your personal information to provide you with marketing information about services, promotions and offers that may be of interest to you. This document explains how you can change whether to receive this information. Please note that, even if you choose not to receive this information, we may still use your personal information to provide you with important services communications, including communications in relation to any services we provide to you.

You will only receive marketing communications from us if you have:

- Requested information from us
- If you provided us with your details and ticked the box at the point of entry of your details for us to send you marketing communications
- You have not opted out of receiving marketing
- Where we have an appropriate lawful basis

We will get your express opt-in consent before we share your personal data with any third party for marketing purposes.

### **How to change your preferences**

We respect your rights and will respond to any request for access to personal information and requests to delete, rectify, transfer, data and to stop processing. We will also advise you on how to complain to the relevant authorities. Where possible any requests or objections should be made in writing to the Data Controller, or you can visit our website, call, or email us to contact us to exercise your rights, make a complaint, or change your preferences at any time.



## Opting out at a later date

Where you give your consent for us to process your data, for example when you agree to us sending you marketing information or where you agree to us processing financial data, you can contact us to amend or withdraw your consent at any time. You can also choose to object to processing and request deletion of your data. We respect all user rights. If you have any comments or wish to complain please contact us.

## How we store and process your data

Your data will be collected, stored and processed securely, where we transfer your data internationally, we will ensure we take appropriate precautions to protect this data.

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to find out more about how the processing for the new purpose is compatible with the original purpose, please email us. If we need to use your personal data for a purpose unrelated to the purpose for which we collected the data, we will notify you and we will explain the legal ground of processing.

We may be legally obliged to disclose your personal information without your knowledge to the extent that we are required to do so by law; in connection with any ongoing or prospective legal proceedings; in order to establish, exercise or defend our legal rights (including providing information to others for the purposes of fraud prevention and reducing credit risk); to any person who we reasonably believe may apply to a court or other competent authority for disclosure of that personal information where, in our reasonable opinion, such court or authority would be reasonably likely to order disclosure of that personal information.

## Our obligations

We are a Data Controller. In relation to the information that you provide to us, we are legally responsible for how that information is handled. We will comply with the GDPR in the way we use and share your personal data.

Under certain circumstances, you have rights under data protection laws in relation to your personal data. These include the right to:

- Request access to your personal data;
- Request correction of your personal data;

- Request erasure of your personal data;
- Object to processing of your personal data;
- Request restriction of processing your personal data;
- Request transfer of your personal data;
- Right to withdraw consent.

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

We aim to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

### **Third Parties**

We may have to share your personal data with selected third parties in order to meet our obligations to you and for the purposes described in this document:

- Service providers who provide IT and system administration services;
- Third parties including data processors, suppliers, service providers, equipment providers, and other third parties as required to run and grow our business;
- Professional advisers including lawyers, bankers, auditors and insurers who provide consultancy, credit scoring, banking, legal, fraud protection, insurance and accounting services;
- Other technology companies providing tracking, analytics, and advertising services;
- Social media companies;
- Companies in our Group of companies;
- Partners and other organisations involved in the provision of our services to you and as required to operate our company;

- Government organisation, regulators, other legal authorities and other relevant jurisdictions who require reporting of processing activities in certain circumstances;
- Third parties to whom we sell, transfer, or merge parts of our business or our assets;
- Other companies as required to meet our obligations to you and run our business.

We require all third parties to whom we transfer your data to respect the security of your personal data and to treat it in accordance with the law. We only allow such third parties to process your personal data for specified purposes and in accordance with our instructions.

## Security

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know such data. They will only process your personal data on our instructions, and they are subject to a duty of confidentiality.

Where required under applicable data protection laws we will report any breaches or potential breaches to the appropriate authorities within 24 hours and to anyone affected by a breach within 72 hours. If you have any queries or concerns about your data usage, please contact us.

Our website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy notice of every website you visit.

## Cookies

A cookie is a small file which asks permission to be placed on your computer's hard drive. Once you agree, the file is added, and the cookie helps analyse web traffic or lets you know when you visit a particular site. Cookies allow web applications to respond to you as an individual. The web application can tailor its operations to your needs, likes and dislikes by gathering and remembering information about your preferences. We use traffic log cookies to identify which pages are being used. This helps us analyse data about webpage traffic and improve our website in order to tailor it to customer needs. We only use this information for statistical analysis purposes and then the data is removed from the system.

Overall, cookies help us provide you with a better website by enabling us to monitor which pages you find useful and which you do not. A cookie in no way gives us access to your computer or any information about you, other than the data you choose to share with us.

You can choose to accept or decline cookies. Most web browsers automatically accept cookies, but you can usually modify your browser setting to decline cookies if you prefer. This may prevent you from taking full advantage of the website.

As well as your ability to accept or reject cookies, we also require your permission to store cookies on your machine, which is why when you visit our site, you are presented with the ability to accept our terms of use, including the storage of cookies on your machine.