

## **Privacy Policy**

This Privacy Policy applies to all website and web applications which link to this policy and are published by INAC (“website” or “site”). If you wish to amend any of the personal information that we hold about you, update your marketing preferences or learn more about how we use your personal information, you can do so at any time by contacting [marketing@inac.uy](mailto:marketing@inac.uy).

### **Information we collect**

Information we collect from you can include but is not limited to:

- Your name
- Your company name
- Your title
- Your email address
- Your telephone number(s)
- Your business address

### **Additional information**

On occasion, we will ask you to voluntarily provide additional information, for example:

- Your opinion of our products and services;
- Your preferences, including emails and other communications;
- Other information relevant to our industry.

### **Information we obtain through cookies and similar tools**

We use cookies (and similar technologies) and analytics tools across our website to collect information about you. This information can be used to improve the performance of the site and enhance your user experience. We provide detailed information about cookies and similar technologies within our Cookie Policy. Examples include:

- **Your location** – we use cookies to display the version of the site that is most relevant to your location.
- **Your usage** – we use cookies to understand how our customers use our website and interact with our communications. For example, we use technology on our website which records user movements, including page scrolling, clicks and text entered. This helps us to identify usability issues and improve the assistance we can provide to users and is also used for aggregated and statistical reporting purposes.
- **Your device** – we use cookies to understand what type of device you are using to show you the best version of the site.

If you wish to manage your cookies, please follow the instructions in the “How to manage cookies” section within our Cookie Policy below.

### **Lawful basis for processing**

We only process personal information where we have a lawful basis for doing so, such as the following:

- **User consent** – This is where you have given us explicit permission to process personal information for a given purpose. You have the right to withdraw this consent at any time. You can manage your preferences by contacting [marketing@inac.uy](mailto:marketing@inac.uy).
- **Legitimate business purposes** – This is where we have a legitimate interest, as a business, to process personal information. For example, where we are aware of copyright infringements on our site, it is in our legitimate interests as a business to identify those responsible. We take due care to balance our interests against your right to privacy.

### **How we use your personal information**

We collect personal information for these main reasons:

1. **To provide our service** – We require some of your basic personal information so our services work as you would expect.
2. **To improve and maintain performance** – In order to provide you with the best possible user experience and value, we need to make sure that our products and services work as they should. Using personal information helps us understand how our readers experience our website and services, so we can make improvements.
3. **To personalize our products and services** – We improve your experience of our products and services by personalizing parts of our website and apps with the information you give us and what we learn about you. This includes showing you articles you may be interested in and recommending emails you may wish to sign up to.

### **We do not share your personal information with anyone.**

We do not disclose your personal information to any other business entity or person for any reason.

### **How long we retain your personal information**

We retain the majority of your personal information for as long as you are an active user of our site and continue to access our content, products and services. If you become inactive and are no longer a subscriber, we may delete elements of the information associated with your account. Where we don't need to keep all your information in full, we will obfuscate or aggregate it, for example, web activity logs and survey responses. This is to ensure that we do not retain your information for any longer than is necessary.

It is sometimes necessary for us to keep your personal information for longer periods of time, for example:

- If there is a statutory requirement to retain it;
- If we require the information for legal reasons or there is a legitimate business need for us to retain it;
- To ensure we do not contact you if you have asked us not to.

### **How we keep your personal information secure**

We have appropriate technical and administrative security measures in place to help ensure that our users' information is protected against unauthorized or accidental access, use, alteration, or loss. We

use encryption technology to protect your personal information when you order products or services from us.

### **Your rights**

Under data protection laws, you have rights as an individual in relation to the personal data we hold about you. These rights include:

- The right to object to direct marketing – your preferences, including in relation to direct marketing;
- The right to access the personal data that we process about you;
- The right to request the deletion of your personal data;
- The right to request the rectification of your personal data

You can exercise these rights by contacting [marketing@inac.uy](mailto:marketing@inac.uy).

You also have the right to lodge a complaint with a supervisory authority. The FTC encourages consumers to file a complaint whenever they have been the victim of fraud, identity theft, or other unfair or deceptive business practices. They can do it online, or by calling the FTC's Consumer Response Center at 1-877-FTC-HELP (1-877-382-4357).

### **Where this Privacy Policy applies**

Our website is not intended for children under 16 years of age. We do not intentionally collect or use any information from children. Our website may contain links to third party websites which are not subject to this privacy policy. We are not responsible for their content, use of personal information or security practices.

If you have questions regarding the processing of your personal information, please contact [marketing@inac.uy](mailto:marketing@inac.uy).

### **Changes to this Privacy Policy**

This policy is effective beginning 02/25/2019. Any changes we may make to this Privacy Policy will be posted on this page. If changes are significant, we may choose to notify you by email or to clearly indicate on our home page that the policy has been updated.

## **Cookie Policy**

INAC uses cookies to keep our website reliable, secure and personalized. When you accept cookies, this helps make the site better by remembering your preferences and enhancing your experience of our website. By using our website, you consent to our use of cookies in accordance with our Cookie Policy.

If you have any questions about the way we use your personal information or cookies, please contact [marketing@inac.uy](mailto:marketing@inac.uy). If you wish to manage your cookies, please follow the instructions in the “How to Manage Cookies” section below.

### **What are Cookies?**

Cookies are small text files which a website may place on your computer or device when you visit a site. The cookie will help the website recognize your device the next time you visit. Web beacons, pixels or other similar files can also do the same thing. We use the term “cookies” in this policy to refer to all files that collect information in this way.

Cookies serve many functions. For example, they can help us to remember your username and preferences, analyze how well our website is performing or allow us to recommend content we believe will be most relevant to you.

Most websites use cookies to collect and retain personal information about their visitors. Most cookies collect general information, such as how visitors arrive at and use our website, the device they are using, their internet protocol address (IP address), what pages they are viewing and their approximate geographic location.

### **Purpose of Cookies**

We group our cookies into the categories outlined below.

- **Operating our Website**

Some cookies are essential for the operation of our site. This includes cookies for the following purposes:

- **Access** – we use these cookies to identify subscribers and ensure access to all pages.
- **Performance** – we use these cookies to monitor website performance. This allows us to provide a high-quality experience by quickly identifying and fixing any issues that arise. For example, we might use performance cookies to track error messages, and to determine improvements to our website.
- **Functionality** – we use functionality cookies to allow us to remember your preferences. For example, we use functionality cookies to provide you with enhanced services, such as allowing you to watch a video online or comment on a blog.
- **Fraud prevention** – we use cookies to monitor and prevent suspicious activity and fraudulent traffic

- **Personalization**

We use cookies to improve your experience of our products by personalizing our website. For example, we serve pages to you based on your past activities on the website.

- **Third party cookies on our website**

We also use third party cookies on our website for the following reasons:

- to help us monitor traffic on our website (like many companies, we use Google Analytics to do this);
- to identify fraudulent or non-human traffic;
- to assist with market research;
- to improve website functionality;
- to monitor compliance with our terms and conditions and copyright policy.

- **Use of pixels in emails**

Our emails often contain a single, campaign-unique “web beacon pixel” to tell us whether, and how many times, our emails are opened and verify any clicks through to links or advertisements within the email. We use this information for purposes including:

- Determining which of our emails are more interesting to users;
- Determining users’ activity and engagement with our products and services;
- Determining how many users have clicked on various places on our website.

The pixel will be deleted when you delete the email. If you do not wish the pixel to be downloaded to your device, you should select to receive emails from us in plain text rather than HTML via your email provider settings.

#### **How to manage cookies**

You can manage which cookies are set on your device via your browser settings. For more information, please visit your browser’s help page.

#### **More information**

Further information about our data processing can be found above in our Privacy Policy.

#### **Changes to this Cookie Policy**

This policy is effective beginning 02/25/2019. Any changes we make to this cookie policy will be posted on this page. If changes are significant, we may choose to notify you by email or to clearly indicate on our home page that the policy has been updated.