

WEB PRIVACY NOTICE

GRUPO MSA S.A. (hereinafter “**MSA**”) is the owner of the Website <https://comitiacorp.com/> (hereinafter the “**Website**”). MSA is a business group from Argentina, composed of entities such as Comitia MSA Corp. (USA), Comitia Paraguay S.A., xCruza Lab S.A., SingularIT S.A., Comitia MSA Corp S.R.L. (Costa Rica), GRUPO MSA S.A. (foreign company in Honduras), GRUPO MSA S.A. (Ecuador Branch), Comitia Uruguay S.A., Comitia Holding NL B.V., Comitia EU, S.L.U., Comitia USA LLC, SOE Software Corporation (USA), ScytI Software Design L.L.C. (UAE), and Comitia Canada Inc.

The aforementioned entities are joint controllers for the processing of personal data of Website browsers and users (hereinafter “**Users**”), in accordance with Article 26 of Regulation (EU) 2016/679. The joint controllers have signed an internal agreement determining their respective responsibilities regarding compliance with data protection obligations, particularly concerning the exercise of data subjects' rights and information duties.

Through this Web Privacy Notice, and in compliance with Articles 12 and 13 of Regulation (EU) 2016/679 (hereinafter “**GDPR**”) and Article 11 of Organic Law 3/2018, of December 5, on the Protection of Personal Data and Guarantee of Digital Rights (“**LOPDGDD**”), MSA informs Users who use the Website about the processing of their personal data that may be collected through it and processed by MSA.

Users may exercise their rights before any of the joint controller entities via email at **dpo@msa.com.ar**, as well as request information regarding the essential aspects of said agreement.

DATA PROCESSED, LEGAL BASES, PURPOSES, AND RETENTION PERIOD

Data Processed	Legal Bases	Purposes	Retention Period
Browsing Data. Due to Internet communication standards, when the User accesses our Website, we automatically receive the IP address, device type, browser, and technical logs of access and use.	Legitimate Interest	To ensure Website security, prevent unauthorized access or fraudulent use, manage traffic, detect technical incidents, and ensure correct operation, including	Retention periods depend on each specific technical cookie. For more information, see the Cookie Policy .

		the use of technical cookies.	
Browsing Data. Obtained through analytical, personalization, and advertising cookies or similar technologies.	Data Subject's Consent	To analyze browsing behavior, compile usage statistics, measure results, improve services, personalize content, and show interest-based advertising.	Retention periods depend on each cookie or technology used. For more information, consult the Cookie Policy .
Contact Data. Name, last name, email, phone number, and any other information provided by the User in the message.	Data Subject's Consent	To attend to and respond to requests, comments, or suggestions, manage commercial contact, and provide information about services, including pre-contractual relationships.	Personal data will be processed for the time necessary to resolve the inquiry. Data will then be blocked to comply with legal obligations and subsequently deleted.
Data from analysis, marketing, and communication tools. Integration of third-party tools (Meta, LinkedIn, YouTube) for behavior analysis, advertising, and embedded content.	Data Subject's Consent	To analyze navigation, measure performance, personalize content, optimize ad campaigns, and facilitate communication (e.g., Google Analytics, Meta Ads).	According to the periods associated with the technologies used, as detailed in the Cookie Policy .

Commercial Communications. The User may subscribe to the MSA Newsletter using their email address.	Data Subject's Consent	To send commercial information about MSA. For more information, please consult our Legal Notice .	Data will be processed until the User withdraws consent. Afterward, it will be blocked for the duration of legal obligations and then permanently deleted.
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TO WHICH RECIPIENTS WILL YOUR DATA BE COMMUNICATED?

MSA informs that it will not transfer the User's personal data to third parties, except for:

- **Technology service providers** (Data Processors) for: Database maintenance, Newsletter management, analytics, hosting, email services, consent management (CMP), payment gateways, and external platforms (Google, Meta, LinkedIn).

The mentioned providers may be located in jurisdictions that do not offer adequate guarantees. For entities outside the **European Economic Area (EEA)**, MSA may perform international transfers:

- **Intra-group transfers:** Regulated by an intra-group agreement incorporating **Standard Contractual Clauses (SCCs)** approved by the European Commission. Transfers to MSA entities in **Argentina** are covered by the European Commission's adequacy decision (June 30, 2003).
- **Third-party providers:** For providers in the U.S. or other non-EEA countries, MSA ensures mechanisms such as the **EU-U.S. Data Privacy Framework** or SCCs.

Additionally, MSA may communicate data to:

- Companies interested in acquiring the business (Due Diligence).
- Competent Authorities investigating fraud, harassment, or other legal violations.

SECURITY AND CONFIDENTIALITY

MSA undertakes to adopt the necessary physical, technical, and organizational measures to guarantee data security and prevent accidental or unlawful destruction, loss, alteration, or unauthorized access. Personal data will be treated confidentially by MSA and its employees/partners.

USER RIGHTS

Users may exercise their rights of **access, rectification, erasure, objection, and, where applicable, restriction of processing and portability** by emailing dpo@msa.com.ar.

Furthermore, Users may file a complaint with a supervisory authority, specifically the **Spanish Data Protection Agency (www.aepd.es)**, if they believe their rights have been violated.

CHANGES TO THE WEB PRIVACY NOTICE

MSA reserves the right to modify this notice at any time. Updates will be explicitly notified to the User via a notice on the Website along with the updated version.

Last version: May 11, 2026