

INTERNATIONAL PRIVACY POLICY

Privacy Policy for European and Swiss Customers (GDPR / LPD)

Quokka Sagl (P. IVA CHE-433.635.986), in the person of its legal representative pro tempore, with registered office in Piazza Santa Lucia, 7 6900 Massagno as Data Controller, informs you that, in compliance with the New Federal Data Protection Law (DPA) and the GDPR 679/2016 Regulation, which regulate the protection of personal data and their free movement, your personal data will be processed in accordance with the New Federal Data Protection law (LPD) and the GDPR Regulation 679/2016 respectively, where applicable, in accordance with the principles of fairness, lawfulness, proportionality of interests and transparency, as well as the protection of your privacy and your rights, for the purposes, in the manner and under the terms set out below.

-1- Purposes, methods and legal bases of data processing

Your personal data will be processed exclusively for purposes strictly connected, instrumental and necessary to the fulfilment of the obligations inherent to the relationship with our Company; in particular: the processing of personal data is carried out by means of the operations of collection, registration, organization, storage, consultation, processing, modification, selection, extraction, comparison, use, interconnection, blocking, communication, cancellation and destruction. Personal data shall be processed by means of paper and/or computer media by the data controller, the person(s) in charge and the authorized persons (appointees) with the observance of all precautionary measures guaranteeing their security and confidentiality. The data will not be subject to profiling or automated decision-making processes. The data will be stored at the data controller and at the data processors designated by the data controller. In any event, your personal data will be stored and processed within the borders of the Helvetic Confederation or those of the European Union. The explicit acceptance of this information by means of a paper signature, computer acceptance (opt-in) made online, fulfilment of contractual obligations and other conditions provided for by the laws and regulations concerning the protection of personal data and constitutes the legal basis for the processing of personal data.

-2- Nature of data collection and consequences of failure to provide data

The provision of your personal data is mandatory in order to execute the existing contract or the services requested and to fulfil the obligations arising therefrom, including legal obligations. Your data may be collected and processed on the basis of legitimate interest insofar as necessary to fulfil legal obligations under current regulations.

Failure to provide consent may result in our inability to fulfil our contractual obligations or the services requested. Consent to the use of your data for marketing and/or advertising purposes (sending e-mails and/or communications with advertising offers), on the other hand, is optional.

Special categories of personal data: Pursuant to Articles 5 and 6 of the DPA and Art. 9 of Regulation 679/2016 GDPR, you may provide data that qualifies as 'personal data worthy of special protection', i.e. data concerning religious, philosophical, political or trade union opinions or activities, health, intimate and family life or membership of a race or ethnic group, genetic data biometric data that uniquely identify a natural person, data concerning social assistance measures.

-3- Timing and terms

The Data Controller, data processors and authorized persons (appointees) shall process personal data for the time necessary to fulfil the purposes set out above and, in any case, for no longer than 10 years from the termination of the relationship where this is provided for or made necessary by the regulations in force.

-4- Communication and dissemination of data

Your personal data, for the purposes of executing the contract and for the purposes indicated above, may be communicated:

- to all natural and legal persons (by way of example but not limited to legal, administrative and tax consultancy firms, auditing firms, couriers and forwarding agents, data processing center, consultants, IT consultants, suppliers, etc.) in cases where communication is necessary for the purposes described above;
- to banking institutions for the management of collections and payments;
- to factoring or debt collection companies;
- to our collaborators and employees specifically appointed for this purpose and within the scope of their duties;
- to our service providers where necessary to carry out the activities covered by our company's service contract;
- to the owner of the property leased to the tenant for purposes related to the signing of the contract and the fulfilment of related regulatory aspects.

-5- Rights of the data subject

By calling +410919240108 or writing to info@quokka360.com at any time you may exercise your rights vis-à-vis the Data Controller (Data Controller) in accordance with the New Federal Data Protection Law (LPD) and the GDPR 679/2016 Regulation, which we reproduce for your convenience. The data subject shall have the right to obtain confirmation of the existence and/or the fact that personal data concerning him/her is or is not being processed, even if not yet registered, as well as its communication in intelligible form. The data subject has the right to be informed:

- the origin of the personal data (with particular regard to the case where the data are not collected from the data subject and, in the case of transfer of data to a third country, the existence of appropriate guarantees of the purposes and methods of processing);
- of the logic applied in the event of processing carried out with the aid of electronic instruments;
- the identity of the data controller, data processors and the designated representative;
- of the entities or categories of entity to whom or which the personal data may be communicated or who or which may get to know said data in their capacity as designated representative(s) in the State's territory, data processor(s) or authorized entity(ies);
- the categories of personal data being processed;
- the retention period of the data or the criteria used to determine this period;
- the existence of automated decision-making processes, with particular regard to profiling, and the logic applied to them;
- the right to obtain a copy of the personal data being processed;

The data subject also has the right to obtain:

- the updating, rectification or, when he/she is interested, the integration of data;
- the cancellation, transformation into anonymous form or blocking of data processed unlawfully, including data whose retention is unnecessary for the purposes for which the data were collected or subsequently processed;
- certification to the effect that the operations as per letters a) and b) have been notified, as also related to their contents, to the entities to whom or which the data were communicated or disseminated, unless this requirement proves impossible or involves a manifestly disproportionate effort compared with the right that is to be protected;
- for legitimate reasons relating to his particular situation, even if the processing is relevant to the purpose of the collection;
- the portability of the data to other subjects, for which an explicit request must be made to the following addresses +410919240108, info@quokka360.com ;

- the cancellation of the data in our archives (so-called right to be forgotten), by means of a communication to +410919240108, info@quokka360.com ;

- to restrict the processing of data in accordance with the Federal Data Protection Law(LPD).

The data subject also has the right to object, in whole or in part, to the processing of data:

- the processing of personal data concerning him/her for the purpose of sending advertising materials or direct selling or for the performance of market research or commercial communication; the processing of data including profiling on the basis of such provisions.

Where the processing of data is based on the data subject's consent, the data subject shall have the right to withdraw such consent at any time by making an explicit request to the following address: +410919240108 or info@quokka360.com. The data subject shall also have the right to lodge a complaint with the Control Authority. The exercise of the aforementioned rights may be exercised by making a request to the Data Controller or the person in charge by telephone, by email to the above-mentioned addresses or by registered letter with return receipt.

Consent of the data subject

In requesting your express manifestation of your consent to the processing (which we shall, however, consider to have been given orally in the event that you do not return this undersigned letter), we shall consider you, as of now, informed about the processing carried out by us, pursuant to and for the purposes of the Federal Data Protection Law (LPD) and the GDPR Regulation 679/2016.I, the undersigned, having acquired the information provided by the Data Controller:

I give my consent to the processing of my personal data for the purposes indicated in the above information notice

O - I give consent O - I withhold consent

I give my consent to the communication of my personal data for the purposes and to the third parties indicated in the information under -4-

O - I give consent O - I deny consent

I give my consent for the use, also for advertising and profiling purposes, of my personal data for the purposes and within the scope indicated in the Information Notice.

O - I give consent O - I withhold consent

Surname..... First name.....

Date and Place, Signature.....

Privacy Policy for North American Customers

Quokka Sagl (P. IVA CHE-433.635.986) is committed to protecting the privacy of our customers in the United States. This Policy describes how we collect, use, disclose, and protect your personal information in accordance with applicable laws, including the California Consumer Privacy Law (CCPA/CPRA), the Virginia Consumer Data Protection Law(VCDPA), and other relevant State and Federal Regulations.

1. Information We Collect

We may collect the following categories of personal information:

- Identifying Data: Name, address, telephone number, email;
- Financial data: Payment information, transaction history, credit cards, bank accounts;
- Browsing data: IP address, browser type, activity on our website cookies;
- Sensitive data (only if necessary) Health information (under HIPAA) or other specific data required by law;
- Personal documents, ID card, passport, residence permits, other personal documents required for tourist stay.

2. How we use your data

We use your data to:

- Provide our services and complete requested transactions;
- Receive and return any deposits;
- Improve your experience on our website and personalize content;
- Respond to customer service and support requests;
- Fulfill legal and regulatory obligations.

3. Sharing of personal data

We may share your data with:

- Service providers who support our activities (e.g. payment processing, marketing analysis);
- Government authorities, if required by law or to protect our rights;
- Suppliers and advertising partners, in accordance with the CCPA and other privacy regulations;

4. Your privacy rights

Under applicable state law (e.g. CCPA/CPRA, VCDPA), you have the right to:

- Access your personal data;
- Request deletion of your data, subject to legal exceptions;
- Object to the sale or sharing of your data (for California residents);
- Correct incorrect information about you;
- Restrict the use of sensitive data (if applicable).

To exercise your rights, you can contact us at info@quokka360.com or call +410919240108.

5. Data security

We take technical and organizational measures to protect your data from unauthorized access, misuse or disclosure. However, no system is completely secure, so we recommend that you protect your access credentials.

6. Changes to this policy

We reserve the right to update this policy periodically. We will notify you of any significant changes by posting a notice on our website.

7. Contact

If you have any questions or requests about privacy, you can contact us at:

Email : info@quokka360.com.

Telephone : +410919240108

If you reside in California and wish to exercise your rights under the CCPA, you may also submit a request via our online form available at www.quokka360.com .

This notice complies with the privacy laws of the United States, including those of California, Virginia, and applicable federal regulations.

Privacy Policy for Customers in Latin America

Quokka Sagl (P. IVA CHE-433.635.986) is committed to protecting the privacy of its customers in Latin America by ensuring compliance with the data protection laws in force in the different countries of the region. These include:

- Brasil : Lei Geral de Proteção de Dados Pessoais (LGPD);
- México : Ley Federal de Protección de Datos Personales en Posesión de los Particulares (LFPDPPP);
- Argentina : Ley de Protección de los Datos Personales (Ley 25.326);
- Chile : Ley N° 19.628 sobre Protección de la Vida Privada;
- Colombia : Ley 1581 de 2012 y Decreto 1377 de 2013;
- Peru: Ley de Protección de Datos Personales (Ley N° 29733).

This policy explains in detail how we collect, use, share and protect your personal data in accordance with local laws.

1. Personal data we collect

Depending on the service requested and the legislation in your country of residence, we may collect the following categories of personal data:

1.1 General Data

- First and last name;
- Home address;
- Telephone number;
- Email address;
- Personal documents, identity card, passport, residence permit, other personal documents required for the tourist stay.

1.2 Financial and payment data

- Credit or debit card details;
- Bank information for processing transactions;
- Purchase and transaction history.

1.3 Browsing and technological data

- IP address and device identifiers;
- Cookies and tracking technologies;
- Data on navigation on our website and user preferences.

1.4 Sensitive data (only where necessary and with explicit consent)

In some cases, we may collect information that is considered sensitive data by law, such as:

- Health data (if necessary for the provision of a specific service);
- Biometric data (e.g. fingerprints or facial recognition for access to certain services).

For the collection and processing of sensitive data, we will always require your explicit consent, as required by the LGPD (Brazil) and similar regulations in Argentina, Colombia and other countries.

2. Purpose of data processing

We use your personal data for:

- Provide you with our products and services (e.g. order processing, shipping, invoicing);
- Improve the customer experience by analyzing data about purchasing preferences and customizing offers;
- Ensure the security of transactions by preventing fraud and unauthorized access;
- Communicate with you, sending updates on orders, special offers or changes to terms of service;
- Respond to customer service and support requests;
- Fulfilling legal obligations as required by local regulations.

3. Legal basis for data processing

We only process your data when we have a valid legal basis, which may include:

- Explicit consent : When required by law (e.g. for sensitive data or direct marketing activities);
- Performance of a contract : When the data is necessary to provide you with a requested service;
- Legal obligation : When we are required by law to retain or provide data to authorities;
- Legitimate interest : When we use data to improve our services, prevent fraud or ensure security. In compliance with the regulations, Brazil (LGPD) and Argentina (Ley 25.326), your consent will be requested explicitly for certain specific processing activities.

4. Sharing of personal data

Your personal data may be shared with:

- Third party service providers , such as payment, logistics, IT and marketing platforms;
- Government authorities , if required by law or to comply with legal obligations;
- Advertising partners, but only with your explicit consent (if required by local law);
- Sharing for direct marketing purposes only if you have given your consent;
- Profiling only if you have given your explicit consent.

If your data is transferred outside your country (e.g. to servers in the United States or Europe), we ensure that it is protected by appropriate measures, such as EU-approved Standard Contractual Clauses or other guarantees required by local DPA Law.

5. Your privacy rights

Depending on your country of residence, you may have the following rights to your personal data:

Diritto	Brasile (LGPD)	Messico (LFPDPPP)	Argentina (Ley 25.326)	Colombia (Ley 1581)	Perù (Ley 29733)
Accesso ai dati	✓	✓	✓	✓	✓
Rettifica dei dati	✓	✓	✓	✓	✓
Cancellazione dei dati	✓	✓	✓	✓	✓
Opposizione al trattamento	✓	✓	✓	✓	✓
Portabilità dei dati	✓	✗	✗	✗	✗
Revoca del consenso	✓	✓	✓	✓	✓

To exercise your rights, you can contact us at info@quokka360.com or call +410919240108 .

6. Data storage and security

We take appropriate technical and organizational measures to protect your personal data against unauthorized access, alteration, disclosure or destruction. Such measures include:

- Data encryption;
- Strict access controls;
- Continuous monitoring of our IT infrastructure;
- Staff training on data protection.

7. International data transfers

If your data is to be transferred outside your country, we ensure that this is done in accordance with local regulations. We use protective measures such as:

- Standard contractual clauses (for transfers to countries with less stringent privacy laws);
- Specific agreements with suppliers to ensure processing in accordance with local laws.

8. Changes to this policy

We reserve the right to update this policy. Any changes will be communicated via our website or other appropriate means.

9. Contact

If you have any questions or requests about privacy, you can contact us at:

Email :info@quokka360.com.

Telephone : +410919240108.

This policy complies with data protection laws in Latin America, including Brazil, Mexico, Argentina, Chile, Colombia and Peru .

日本における個人情報保護方針

[貴社名] は、個人情報の保護に関する法律（APPI）、日本の個人情報保護法およびその最新の改正に基づき、日本におけるお客様のプライバシー保護に努めています。

本方針は、日本の法律に従い、当社がお客様の個人情報をどのように収集、使用、共有、保護するかを説明するものです。

1. 収集する個人データ

要求されたサービスに応じて、当社は以下のカテゴリーの個人データを収集することがあります：

1.1 識別データ

- 姓名
- 住所
- 電話番号
- Eメールアドレス
- 身分証明書、パスポート、滞在許可証などの個人書類、その他観光滞在に必要な個人書類。

1.2 財務および支払いデータ

- クレジットカード番号またはデビットカード番号
- 支払管理のための銀行情報
- 取引履歴

1.3 閲覧および技術データ

- IPアドレス
- デバイスおよびブラウザ情報
- クッキーおよびトラッキングデータ
- 当社ウェブサイトの閲覧履歴およびインタラクション

1.4 機微（センシティブ）データ（必要な場合に限り、明示的な同意を得た場合のみ

APPIに従い、当社は、必要な場合に限り、お客様の明示的な同意を得て、機微な個人データを収集することがあります。これには以下が含まれます：

- 健康データまたは生体データ
- プロファイリングおよび購買行動
- その他、日本の法律で「特別な個人情報」と定義されているデータ

2. データ処理の目的

当社は、お客様の個人情報を以下の目的で利用します：

- 製品およびサービスの提供：注文処理、発送、カスタマーサービス
- ユーザーエクスペリエンスの向上：サイトおよびコミュニケーションのパーソナライズ
- 支払い処理と不正行為の防止：取引の確認と財務の安全性。
- コミュニケーション：注文、プロモーション、会社の最新情報に関する電子メールの送信。
- 法的および規制上の義務：税務および消費者保護規制の遵守。

上記以外の目的でお客様のデータを使用する場合は、事前にお客様に通知し、法律で義務付けられている場合はお客様の同意を求めます。

3. データ処理の法的根拠

日本では、個人データの処理は、APPIに規定された以下の条件のいずれかに基づいて行われなければならない：

- ユーザーの同意（機微データまたはマーケティング目的で必要な場合）。
- 契約上の必要性（要求されたサービスの提供のため）。
- 法的義務（法律が特定のデータの収集または保持を要求する場合）。
- 正当な利益（サービスの向上および情報セキュリティのため）。

4. 個人データの共有および転送

お客様の個人データは、以下の者と共有されることがあります：

- サービスプロバイダー：決済、物流、カスタマーサービス、IT企業。
- 公的機関：日本の法律で義務付けられている場合
- 広告パートナー：マーケティング活動およびターゲット広告のために、お客様の同意を得た場合に限りです。

4.1 国際的なデータ転送

当社がお客様のデータを日本国外に転送する場合（例えば、他国のサーバーに転送する場合）、当社は以下の方法によりAPPI規制の遵守を確保します：

- 移転先国における適切な保護措置。
- データの受領者との契約上の合意。
- 日本の法律が要求するものと同等のセキュリティ条項。

お客様のデータが日本と同等の保護基準を持たない国に転送される場合は、透明性のある方法でお客様に通知します。

5. お客様の個人情報に関する権利

APPIは、お客様の個人情報について、以下の権利を付与します：

権利	説明
データへのアクセス	保有するあなたの個人データのコピーを請求できます。
データの修正	誤ったまたは不完全なデータを修正する権利があります。
データの削除	法的義務がない限り、あなたのデータの削除を請求できます。
処理の制限	特定の目的のためにデータが使用されないよう要求できます。
同意の撤回	個人データの処理に同意した場合、いつでも撤回できます。

お客様の権利を行使するには、info@quokka360.comまたは +410919240108 にご連絡ください。

6. データの保持とセキュリティ

当社は、記載された目的を達成するために必要な期間、または日本の法律で義務付けられている期間のみ、お客様の個人データを保持します。弊社は、お客様のデータを以下から保護するためのセキュリティ対策を講じます：

- 不正アクセス
- 不慮の紛失
- 盗難または誤用

当社は、適切なレベルのセキュリティを確保するために、暗号化プロトコルを導入し、データアクセスを制御しています。

7. クッキーとトラッキング技術の管理

当社は、お客様のブラウジング体験を向上させるために、クッキーとトラッキング技術を使用しています。お客様は、ブラウザの設定を通じて、または当社のウェブサイトから直接、クッキーの設定を管理することができます。

また、お客様は、当社に連絡するか、お客様のデバイスの設定を使用して、クッキーに基づくターゲット広告を無効にすることもできます。

8. 本ポリシーの変更

当社は、日本の法律または当社の事業慣行の変更を反映するために、本ポリシーを定期的に更新する権利を留保します。変更があった場合は、当社のウェブサイトまたはその他の公式チャネルを通じてお知らせします。

9. 連絡先およびプライバシーに関する要求

ご質問、ご要望がある場合、またはプライバシーの権利を行使したい場合は、以下のアドレスまでご連絡ください：

電子メール**： info@quokka360.com。

電話番号**： +410919240108。

お客様のデータ処理が日本の法律に準拠していないと思われる場合、お客様は日本の個人情報保護委員会（PPC）に苦情を申し立てる権利を有します。

本通知は、日本国の個人情報の保護に関する法律（APPI）およびその最新の改正に準拠しています。

Privacy Policy for customers Australia and New Zealand

Quokka Sagl (P. IVA CHE-433.635.986) is committed to protecting the privacy of its customers in Australia and New Zealand by complying with local data protection regulations:

- Australia : Privacy Act 1988 (Cth) and the 13 Australian Privacy Principles (APPs);
- New Zealand : Privacy Act 2020 and its implementing guidelines

This policy explains how we collect, use, share and protect your personal information in accordance with Australian and New Zealand Law.

1. Personal information we collect

Depending on the service requested and local legislation, we may collect the following categories of personal data:

1.1 Identifying data

- First and last name;
- Residential and/or shipping address;
- Telephone number;
- Email address;
- Identity document or passport, personal documents such as residence permits, other personal documents necessary for the tourist stay.

1.2 Financial and payment data

- Credit or debit card number;
- Bank information for payment management;
- Purchase and transaction history.

1.3 Browsing and technological data

- IP address;
- Device and browser information;
- Cookies and tracking data;
- Browsing history on our website.

1.4 Sensitive data (only where necessary and with explicit consent)

In accordance with the Privacy Act 1988 (Australia) and the Privacy Act 2020 (New Zealand) , we may only collect sensitive personal data where necessary and with your explicit consent. These include:

- Health data (if required for the provision of certain services);
- Biometric information (e.g. fingerprints or facial recognition for access to certain services);
- Ethnic or religious origin (only if required for specific purposes and with your consent) Profiling and purchasing behaviors.

2. Purpose of data processing

We use your personal data for the following purposes:

- Provision of products and services : order processing, shipping, invoicing and customer service;
- Improving user experience : personalization of the site and marketing communications;
- Payment processing and fraud prevention: transaction verification and financial security;
- Communications: emailing about orders, promotions and company updates;
- Legal and regulatory obligations: compliance with tax regulations.

If we intend to use your information for purposes other than those listed above, we will notify you in advance and request your consent when required by law.

3. Legal basis for data processing

In Australia and New Zealand, the processing of personal data must take place on the basis of one of the following conditions:

- User consent (if required for sensitive data or marketing purposes);

- Contractual necessity (for the provision of requested services);
- Legal obligation (where the law requires the collection or retention of certain data);
- Legitimate interests (for the improvement of services, fraud prevention or security).

4. Sharing and transfer of personal data

Your personal data may be shared with:

- Service providers: payment, logistics, customer service and IT companies;
- Public authorities where required by Australian or New Zealand law;
- Advertising partners, but only with your consent for marketing and targeted advertising.

4.1 International data transfer

If we transfer your data outside Australia and New Zealand (e.g. to servers in other countries), we ensure compliance with local regulations through:

- Contractual agreements with data recipients;
- Adequate security measures, such as encryption and data protection protocols;
- Guarantees equivalent to those required by local laws, as required by the Australian Privacy Principle (APP) 8 and New Zealand's Privacy Act 2020.

We will inform you in a transparent manner if your information is transferred to a country that does not have equivalent protection standards to those in Australia or New Zealand, asking for your prior consent to the transfer if required.

5. Your privacy rights

In both Australia and New Zealand, you have the following rights over your personal information:

| Law | Australia (Privacy Act 1988) | New Zealand (Privacy Act 2020) |

Right	Australia (Privacy Act 1988)	New Zealand (Privacy Act 2020)
Access to data	✓	✓
Rectification of data	✓	✓
Deletion of data	✓	✓
Restriction of processing	✓	✓
Withdrawal of consent	✓	✓

To exercise your rights, you can contact us at info@quokka360.com or call +410919240108.

6. Data retention and security

We retain your personal data for as long as necessary to fulfil the stated purposes or as required by law. We take advanced security measures to protect it from:

- Unauthorized access;
- Accidental loss;
- Theft or misuse.

Our protection measures include encryption, firewalls, access controls and constant monitoring of our IT infrastructure.

7. Management of cookies and tracking technologies

We use cookies and tracking technologies to improve your browsing experience. You can manage your cookie preferences through your browser settings or directly from our website.

You can also choose to disable targeted advertising based on cookies by contacting us or using your device settings.

8. Changes to this policy

We reserve the right to update this policy periodically to reflect any changes in Australian or New Zealand law or our business practices. We will notify you of any changes through our website or other official channels.

9. Contact and privacy requests

If you have any questions, requests or wish to exercise your privacy rights, you can contact us at the following addresses:

Email : info@quokka360.com.

Telephone : +410919240108.

If you believe that the processing of your data is not in accordance with the legislation, you may lodge a complaint with:

- Office of the Australian Information Commissioner (OAIC) for Australia;
- Office of the Privacy Commissioner (OPC) for New Zealand

This notice complies with the Privacy Act 1988 (Australia) and the Privacy Act 2020 (New Zealand) and their implementing guidelines.

Privacy Policy for Customers in Turkey, South Africa, Egypt, Kenya and Nigeria

Quokka Sagl (P. IVA CHE-433.635.986) is committed to protecting the privacy of its customers in Turkey, South Africa, Egypt, Kenya and Nigeria by complying with local data protection regulations:

- Turkey : Law on the Protection of Personal Data No. 6698 (KVKK);
- South Africa : Protection of Personal Information Act (POPIA);
- Egypt : Egyptian Data Protection Law No. 151/2020;
- Kenya : Data Protection Act, 2019;
- Nigeria : Nigeria Data Protection Regulation (NDPR).

This policy describes how we collect, use, share and protect your personal information in accordance with local laws.

1. Personal data that we collect

We may collect the following personal data depending on the service you require and the regulations in your country:

1.1 Identification data

- First and last name;
- Home or shipping address;
- Telephone number;
- E-mail address;
- Identity document, passport, personal documents such as residence permits, other personal documents necessary for the tourist stay.

1.2 Financial and payment details

- Credit or debit card number;
- Bank information for handling payments;
- Purchase and transaction history.

1.3 Browsing and technological data

- IP address;
- Device and browser information;
- Cookies and tracking data;
- Browsing history on our website.

1.4 Sensitive data (only where necessary and with explicit consent)

Turkey, South Africa and Nigeria, provide additional protections for sensitive data, which we may only collect with your explicit consent and for legitimate purposes. These include:

- Biometric or health information (if required for certain services);
- Ethnic or religious origin (only if required and with your consent);
- Judicial data (only if required for legal or compliance procedures);
- Profiling and purchasing behavior.

2. Purpose of data processing

We use your personal data for the following purposes

- Provision of products and services : order management, shipping and customer service;
- Improvement of user experience : personalization of the site and commercial offers;
- Payment processing and fraud prevention : transaction verification and financial security;
- Communications: Sending emails regarding orders, promotions and company updates;
- Legal and regulatory obligations: compliance with tax, data protection and information security regulations.

If we use your data for other purposes, we will inform you in advance and ask for your consent when required by law.

3. Legal basis for data processing

Each country has specific data protection regulations. Our company processes your data on the basis of the following legal conditions:

Country	Legal Basis
Turkey	Consent, legal obligation, contractual performance, legitimate interest (KVKK)
South Africa	Consent, legal obligation, contractual necessity, legitimate interest (POPIA)
Egypt	Consent, contractual necessity, public interest (Law 151/2020)
Kenya	Consent, contractual necessity, legal obligation, public interest (Data Protection Act)
Nigeria	Consent, contractual necessity, legal obligation, legitimate interest (NDPR)

4. Sharing and transfer of personal data

We may share your data with:

- Service providers : payment, logistics, customer service and IT companies;
- Public authorities , if required by local regulations;
- Advertising partners, only with your consent for marketing activities and targeted advertising.

4.1 International data transfer

If your data is transferred outside your country, we take security measures to ensure adequate protection as required by local regulations. These include:

- Standard contractual clauses with data recipients;
- Technical security measures, such as encryption and multi-factor authentication.

5. Your privacy rights

Depending on the country you are in, you have the right :

Right	Turkey (KVKK)	South Africa (POPIA)	Egypt (151/2020)	Kenya (DPA 2019)	Nigeria (NDPR)
Access to data	✓	✓	✓	✓	✓
Rectification of data	✓	✓	✓	✓	✓
Deletion of data	✓	✓	✗ (with exceptions)	✓	✓
Restriction of processing	✓	✓	✗	✓	✓
Withdrawal of consent	✓	✓	✓	✓	✓

To exercise your rights, you can contact us at info@quokkasoo.com or +7 800 19240 100 .

If you believe that the processing of your data does not comply with the regulations, you can lodge a complaint with the competent authorities:

- Turkey : Personal Data Protection Authority (KVKK);
- South Africa : Information Regulator South Africa;
- Egypt : Egyptian Data Protection Center;
- Kenya : Office of the Data Protection Commissioner;
- Nigeria : National Information Technology Development Agency (NITDA).

6. Data retention and security

We retain your data only as long as necessary to fulfill the stated purposes or as required by law.

We adopt security measures such as:

- Advanced encryption to protect sensitive information;
- Firewalls and multi-factor authentication to prevent unauthorised access;
- Secure backups to ensure continuity of service.

7. Cookies and tracking technologies

We use cookies to improve your experience on our site. You can manage your cookie preferences directly from our site or through your browser settings.

8. Changes to this policy

We reserve the right to update this policy periodically to reflect any changes in local laws. We will notify you via our website or other official channels.

9. Privacy contacts

Email : info@quokka360.com.

Telephone : +410919240108.

If you have any concerns about the protection of your data, you may contact the local data protection authorities listed above. This notice complies with the data protection laws of Turkey, South Africa, Egypt, Kenya and Nigeria .

中国客户隐私政策

[贵公司名称]承诺根据中国的数据保护法律法规保护其中国客户个人信息的隐私和安全，这些法律法规包括

- 《个人信息保护法》（PIPL）
- 《网络安全法》（CSL） - 《网络安全法
- 《数据安全法》 - 《数据安全法

本政策详细说明了我们将如何根据中国法律收集、使用、共享和保护您的个人信息。

1. 我们收集的个人信息

我们可能会通过各种方式收集您的个人信息，例如当您访问我们的网站、使用我们的服务或与我们互动时。收集的数据包括

1.1 身份资料

- 姓名
- 电话号码
- 电子邮件地址
- 住址和/或送货地址
- 个人身份号码（如法律验证所需的护照或身份证号码）

1.2 财务和付款详情

- 信用卡/借记卡号
- 付款银行详情
- 交易记录

1.3 浏览和技术数据

- IP 地址
- 设备类型和操作系统
- Cookies 和跟踪数据
- 网站浏览记录

1.4 生物识别和敏感数据（仅在明确同意的情况下）

根据《个人信息保护法》，我们只能在征得您明确同意的情况下出于特定目的收集敏感数据，包括

- 生物识别数据（如用于身份验证的指纹或面部识别）
- 地理位置信息
- 健康数据（如特定服务需要）
- 分析和购买行为

2. 数据处理目的

收集您的个人数据仅用于以下目的：

- 提供产品和服务：订单管理、送货、开票和客户服务。
- 改善用户体验：根据您的偏好提供个性化的报价和建议。
- 付款管理和防欺诈：核实交易以确保财务安全。
- 通信和营销：发送促销电子邮件、更新通知和个性化优惠。
- 法律和监管义务：遵守中国的税务、海关和信息安全法规。

如果我们打算将您的信息用于本政策未涵盖的目的，我们将根据法律要求事先征得您的同意。

3. 数据处理的法律依据

根据《个人信息保护法》（PIPL）的规定，我们在处理个人数据时必须符合以下条件之一：

- 用户的明确同意（尤其是敏感数据和国际传输）。
- 履行合同（提供服务所需的数据）。
- 法律义务（法律要求我们收集或保留某些信息）。
- 合法利益（安全、防止欺诈和改善服务）。

4. 个人数据的保存和保护

您的数据只会为实现上述目的或中国法律要求的必要时间内保留。我们采取严格的安全措施保护您的数据，以防出现以下情况

- 未经授权的访问
- 滥用或泄露
- 意外修改或丢失

这些措施包括加密、多因素验证和持续的 IT 安全监控。

5. 个人数据的共享和传输

我们可能会与以下方面共享您的数据

- 服务提供商（例如，用于支付、物流和客户服务目的）。
- 中国政府机构，如果需要履行法律或国家安全义务。
- 广告合作伙伴，但必须征得您的明确同意。

5.1 国际数据传输

根据《个人信息保护法》（PIPL），中国公民的个人数据必须存储在中国境内，除非我们获得政府许可将数据传输到国外。如果我们需要将您的数据传输到中国境外，我们将确保

- 获得您的明确同意。
- 执行中国当局批准的标准合同条款。
- 确保数据接收方提供与 PIPL 同等的保护标准。

5.2 向我们提供的与履行合同有关的数据不属于第 5.1 条规定的义务范围，因为这些数据是由贵方自愿发送并由我方在我方所在国接收的。

在中国境外收集的数据，如果我们已获得您的明确同意进行收集和存储，则不属于第 5.1 条规定的义务范围。

6. 您对个人数据的权利

根据《个人信息保护法》，您有权

权利	描述
访问数据	您可以请求获取您的个人数据副本。
更正数据	您可以更正您的数据中的任何错误。
删除数据	您可以请求删除您的数据，但需遵守法律义务。
限制处理	您可以要求在特定情况下限制您的数据使用。
撤回同意	您可以随时撤回对数据处理的同意。
数据可携性	您可以请求将您的数据转移到另一个服务。

要行使这些权利，您可以通过 info@quokka360.com 或 +410919240108 联系我们。 如果您认为对您数据的处理不符合法律规定，您可以向中国网络空间管理局（CAC）投诉。

7. 和跟踪技术的使用

我们使用 Cookie 和跟踪工具来改善您的用户体验。您可以通过我们的网站或您的浏览器管理您的 cookie 设置。 根据中国法律，未经您的明确同意，我们不能将 cookie 用于广告目的。

8. 本政策的变更

我们保留不时更新本政策的权利，以反映新法规或我们服务的变化。我们将通过网站或其他官方渠道提前通知您。

9. 隐私联系

如果您对个人数据保护有任何疑问或要求，请联系我们：

电子邮件：info@quokka360.com

电话：+410919240108

如果您对我们的答复不满意，您可以联系中国网络空间管理局（CAC）进行投诉。 本通知符合《个人信息保护法》（PIPL）及其他中国数据保护法规。

Privacy Policy for Customers India

Quokka Sagl (P. IVA CHE-433.635.986) is committed to protecting the privacy and security of its customers' personal data in India in accordance with Indian data protection laws and regulations, including:

- Digital Personal Data Protection Act, 2023 (DPDP Act, 2023);
- Information Technology Act, 2000 (IT Act, 2000) and its rules (IT Rules, 2011 and 2021);
- Consumer Protection (E-Commerce) Rules, 2020;

This policy details how we collect, use, share and protect your personal data in accordance with Indian law.

1. Personal data we collect

We may collect your personal data through our website, applications, customer service communications and transactions.

1.1 Identification data

- First and last name;
- Telephone number;
- Email address;
- Residential and/or shipping address;
- Identity document, passport, personal documents such as residence permits, other personal documents necessary for the tourist stay.

1.2 Financial and payment details

- Credit/debit card number;
- Bank information for payments;
- Transaction history and invoicing.

1.3 Browsing and technological data

- IP address;
- Device type and operating system;
- Cookies and tracking technologies;
- Browsing history on our website.

1.4 Sensitive data (only with explicit consent)

According to the DPDP Act, 2023 , certain data is considered sensitive and requires your explicit consent before collection and processing. These include:

- Biometric data (fingerprints, facial recognition);
- Detailed financial information;
- Health or medical data;
- Data relating to religion, political opinions or personal orientations;
- Profiling and purchasing behaviour.

2. Purpose of data processing

We collect and use your personal data exclusively for the following purposes:

- Provision of products and services : order management, deliveries, invoicing and customer care;
- Improvement of user experience : personalisation of offers and suggestions;
- Payment processing and fraud prevention : transaction verification and financial security;
- Communications and marketing: sending promotional offers, company updates and notifications;
- Legal obligations and compliance: compliance with tax, customs and information security regulations in India.

If we intend to use your information for purposes other than those stated above, we will require your prior consent.

3. Legal basis for data processing

According to the DPDP Act, 2023 , the processing of personal data must take place on the basis of one of the following conditions:

- Explicit consent of the user (mandatory for sensitive data and for direct marketing purposes);
- Performance of a contract (when the data is necessary to provide a service);
- Legal obligation (where the law requires the collection or retention of certain data);
- Legitimate interest (for security, fraud prevention, data analysis).

4. Storage and protection of personal data

We only retain your personal data for as long as necessary to fulfil the stated purposes or for as long as required by law. We take strict security measures to protect your data from:

- Unauthorised access;
- Misuse or disclosure;
- Accidental modification or loss;

Security measures implemented include encryption, firewalls, multi-factor authentication and continuous monitoring.

5. Sharing and transfer of personal data

We may share your data with:

- Service providers (e.g. payment processors, logistics and customer service companies);
- Indian government authorities , if required for legal or national security reasons;
- Advertising partners , but only with your explicit consent.

5.1 International data transfer

According to the DPDP Act, 2023 , transfer of personal data outside India is subject to restrictions. If your data is to be transferred to another country, we will ensure that:

- You have provided your explicit consent ;
- The recipient country has adequate protection measures ;
- Standard data protection clauses are in place.

5.2 Data provided to our company for purposes related to the execution of the contract are not covered by the obligations of section 5.1, since they have been voluntarily sent by you and received by us in the country of our company.

Data collected outside the territory of India for which we have received your explicit consent for collection and storage do not fall under the obligations of section 5.1.

India may impose specific restrictions on the international transfer of sensitive data.

6. Your rights to personal data

In accordance with the DPDP Act, 2023 , you have the following rights:

Right	Description
Access to data	You can request a copy of your personal data.
Rectification of data	You can correct any errors in your data.
Deletion of data	You can request the deletion of your data, except where legal obligations apply.
Withdrawal of consent	You can withdraw your consent for data processing at any time.
Data portability	You can request the transfer of your data to another service.

To exercise these rights, you may contact us at info@quokka360.com or +410919240108. If you feel that the processing of your data is not in compliance with the law, you may file a complaint with the Data Protection Board of India (DPBI)

7. Use of cookies and tracking technologies

We use cookies and tracking tools to enhance your user experience. You can manage your cookie preferences through our website or your browser settings.

According to Indian regulations, we cannot use cookies for advertising purposes without your explicit consent.

8. Changes to this policy

We reserve the right to update this policy from time to time to reflect new legislation or changes in our services. We will inform you in advance via our website or other official channels.

9. Privacy contacts

If you have any questions or requests regarding the protection of your personal data, you can contact us:

Email : info@quokka360.com.

Telephone : +410919240108.

If you are not satisfied with our response, you may contact the Data Protection Board of India (DPBI) to lodge a complaint. This policy complies with the Digital Personal Data Protection Act, 2023 and other Indian data protection regulations.

한국 고객을 위한 개인정보 처리방침

[귀하의 회사명]은 다음을 포함한 한국의 데이터 보호 법률 및 규정에 따라 한국에서 고객의 개인 정보를 보호하고 보안을 유지하기 위해 최선을 다하고 있습니다:

- 개인정보 보호법(PIPA, 개인정보 보호법)
- 정보통신망 이용촉진 및 정보보호 등에 관한 법률(네트워크법)
- 신용정보법

본 정책은 대한민국 법률에 따라 당사가 귀하의 개인정보를 수집, 사용, 공유 및 보호하는 방법을 자세히 설명합니다.

1. 당사가 수집하는 개인정보

당사는 웹사이트, 애플리케이션, 고객 서비스 커뮤니케이션 및 거래를 통해 귀하의 개인정보를 수집할 수 있습니다

1.1 식별 데이터

- 이름과 성
- 전화번호
- 이메일 주소
- 거주지 주소 및
- 개인 등록 번호 또는 세금 코드(법적 또는 납세 의무를 위해 필요한 경우)
- 신분증, 여권, 거주 허가증 등의 개인 서류, 기타 여행자 체류에 필요한 개인 서류.

1.2 금융 및 결제 세부 정보

- 신용카드 번호
 - 결제를 위한 은행 정보
 - 거래 내역
- 1.3 브라우징 및 기술 데이터**
- IP 주소
 - 기기 유형 및 운영 체제
 - 쿠키 및 추적 기술
 - 웹사이트 검색 기록

1.4 생체 인식 및 민감한 데이터(명시적 동의가 있는 경우에만)

PIPA에 따라 특정 데이터는 민감한 데이터로 간주되며 수집 및 처리 전에 명시적인 동의가 필요합니다. 여기에는 다음이 포함됩니다:

- 생체 인식 데이터(지문, 안면 인식)
- 건강 및 의료 데이터
- 자세한 금융 정보
- 종교적 또는 정치적 신념에 관한 정보
- 프로파일링 및 구매 행동

2. 데이터 처리 목적

당사는 다음 목적을 위해서만 귀하의 개인정보를 수집하고 사용합니다:

- 제품 및 서비스 제공, 주문 관리, 배송, 청구서 발행 및 고객 서비스.
- 오퍼 및 제안의 사용자 환경 맞춤화 개선.
- 결제 처리 및 사기 방지 거래 확인 및 금융 보안.
- 프로모션 제안, 회사 업데이트 및 알림을 보내는 커뮤니케이션 및 마케팅.
- 한국의 세금, 관세 및 IT 보안 규정의 법적 의무 및 준수. 위에 열거된 목적 이외의 용도로 귀하의 데이터를 사용하려는 경우, 법에서 요구하는 경우 귀하의 사전 동의가 필요합니다.

3. 데이터 처리의 법적 근거

개인 데이터 처리는 개인정보보호법에 명시된 다음 조건 중 하나에 근거하여 이루어집니다:

- 사용자의 명시적 동의(민감한 데이터 및 직접 마케팅 목적에 필요한 경우).
- 계약 이행(서비스 제공을 위해 데이터가 필요한 경우).
- 법적 의무(법률에서 특정 데이터의 수집 또는 보존을 요구하는 경우).
- 정당한 이익(보안, 사기 방지, 데이터 분석을 위한 경우).

4. 개인 데이터의 보관 및 보호

당사는 명시된 목적을 달성하는 데 필요한 기간 동안 또는 법에서 요구하는 기간 동안만 귀하의 개인정보를 보유합니다. 당사는 다음으로부터 데이터를 보호하기 위해 엄격한 보안 조치를 취합니다:

- 무단 액세스
 - 오용 또는 공개
 - 우발적인 수정 또는 분실
- 구현된 보안 조치에는 암호화, 방화벽, 다단계 인증 및 지속적인 모니터링이 포함됩니다.

5. 개인 데이터의 공유 및 이전

당사는 귀하의 데이터를 다음과 공유할 수 있습니다:

- 서비스 제공업체(예: 결제 처리업체, 물류 및 고객 서비스 회사).
- 법적 또는 국가 안보상의 이유로 필요한 경우 대한민국 정부 당국.
- 귀하의 명시적 동의가 있는 경우에만 광고 파트너.

5.1 국제 데이터 전송

개인정보보호법에 따라 한국 외 국가로의 개인정보 전송은 제한을 받습니다. 귀하의 데이터를 다른 국가로 전송해야 하는 경우, 당사는 이를 보장합니다:

- 사용자가 명시적인 동의를 제공했습니다.
 - 수신 국가에 적절한 보호 조치가 마련되어 있습니다.
 - 표준 데이터 보호 조항이 마련되어 있습니다.
- 한국은 민감한 데이터의 국제 전송에 대해 특정한 제한을 두고 있습니다.

6. 사용자의 데이터 권리

귀하는 개인정보보호법에 따라 다음과 같은 권리를 가집니다:

권리	설명
개인정보 열람 요청 권리	귀하는 본인의 개인정보 사본을 요청할 수 있습니다.
개인정보 정정 요청 권리	귀하는 본인의 개인정보 오류를 수정할 수 있습니다.
개인정보 삭제 요청 권리	법적 의무가 없는 경우, 귀하는 본인의 개인정보 삭제를 요청할 수 있습니다.
동의 철회 권리	언제든지 개인정보 처리에 대한 동의를 철회할 수 있습니다.
개인정보 이동 권리	귀하는 본인의 개인정보를 다른 서비스로 이전하도록 요청할 수 있습니다.

이러한 권리를 행사하려면 info@quokka360.com 또는 +410919240108 로 당사에 문의하실 수 있습니다. 귀하의 데이터 처리가 법률을 준수하지 않는다고 생각되는 경우, 개인정보보호위원회(PIPC)에 불만을 제기할 수 있습니다.

7. 쿠키 및 추적 기술 사용

당사는 사용자 경험을 개선하기 위해 쿠키와 추적 도구를 사용합니다. 귀하는 당사 웹사이트 또는 브라우저 설정을 통해 쿠키 기본 설정을 관리할 수 있습니다. 한국 규정에 따라 당사는 귀하의 명시적인 동의 없이 광고 목적으로 쿠키를 사용할 수 없습니다.

8. 본 정책의 변경

당사는 새로운 법률 또는 당사 서비스의 변경 사항을 반영하기 위해 본 정책을 수시로 업데이트할 권리를 보유합니다. 당사는 웹사이트 또는 기타 공식 채널을 통해 이에 대한 사전 통지를 제공할 것입니다.

9. 개인정보 보호 연락처

개인정보 보호와 관련하여 질문이나 요청이 있는 경우 다음 연락처로 문의하실 수 있습니다:

****이메일**:** info@quokka360.com.

****전화**:** +410919240108.

당사의 답변이 만족스럽지 않은 경우, 개인정보 보호위원회(PIPC)에 연락하여 불만을 제기할 수 있습니다. 본 고지는 대한민국의 개인정보 보호법 및 기타 데이터 보호 규정을 준수합니다.

ANDORRA

Informació sobre la Protecció de Dades Personals per a Clients Residents a Andorra.

Darrera actualització: 21.07.25

Aquesta política de privacitat té com a objectiu informar els clients residents a Andorra sobre com tractem les seves dades personals, d'acord amb la Llei qualificada 29/2021 de protecció de dades personals (LQPD) i, si escau, el Reglament (UE) 2016/679 (RGPD).

1) Responsable del Tractament

Quokka Sagl, Piazza Santa Lucia, 7 6900 Massagno

Email: info@quokka360.com.

Phone Number: +410919240108

2) Finalitats del Tractament i Base Jurídica

Finalitat	Base jurídica
Execució d'un contracte / prestació de servei	Necessitat contractual (Art. 6.1.b RGPD / Art. 13 LQPD)
Facturació i obligacions fiscals	Obligació legal (Art. 6.1.c RGPD / Art. 14 LQPD)
Comunicacions de servei	Interès legítim del responsable (Art. 6.1.f RGPD / Art. 15 LQPD)
Activitats de màrqueting (newsletters, etc.)	Consentiment exprés (Art. 6.1.a RGPD / Art. 12 LQPD)
Anàlisi estadística i millora de serveis	Interès legítim (amb dades anonimitzades o pseudonimitzades)

3) Categories de Dades Tractades

- Dades identificatives (nom, cognoms, data de naixement)
- Dades de contacte (adreça, correu electrònic, telèfon)
- Dades bancàries o de pagament
- Dades sobre l'ús dels serveis
- Preferències per a comunicacions comercials (si escau)

4) Destinataris de les Dades

Les dades poden ser comunicades a:

- Encarregats del tractament (ex. proveïdors tecnològics, assessors fiscals)
- Autoritats públiques quan sigui legalment obligatori
- Plataformes de tercers per a màrqueting, amb el seu consentiment previ

En cas de transferències internacionals de dades, es garanteixen mecanismes de protecció adequada, com ara clàusules contractuals tipus o decisions d'adequació (incloent la d'Andorra per part de la UE).

5) Conservació de les Dades

Les dades es conservaran:

- Durant la vigència del contracte o relació comercial
- Durant 5-10 anys després per obligacions legals i comptables
- Fins a la retirada del consentiment per a tractaments basats en el mateix

6) Drets de la Persona Interessada

Les persones tenen dret a:

Dret	Descripció
Accés	Sol·licitar accés a les dades que tractem sobre vostè.
Rectificació	Corregir dades inexactes o incompletes.
Supressió	Demandar la supressió de les dades (dret a l'oblit), excepte obligacions legals.
Limitació del tractament	Sol·licitar que el tractament es limiti en determinades circumstàncies.
Oposició	Oposar-se al tractament basat en l'interès legítim o amb finalitats comercials.
Portabilitat	Rebre les dades en format estructurat i transferir-les a un altre responsable.
Retirada del consentiment	Retirar el consentiment en qualsevol moment.
Reclamar a l'autoritat de control	Presentar una reclamació a l'Autoritat Andorrana de Protecció de Dades (APDA).

7) Exercici dels Drets

Per exercir qualsevol dret, pot contactar amb nosaltres:

Correu electrònic: info@quokka360.com.

Phone number: +410919240108

També pot adreçar-se a l'APDA mitjançant el lloc web oficial <https://www.apda.ad>

8) Decisions Automatitzades i Perfilat

No es realitzen decisions automatitzades amb efectes jurídics, llevat que hi hagi consentiment exprés per part de l'usuari (ex. recomanacions personalitzades).

9) Mesures de Seguretat

Implementem mesures tècniques i organitzatives apropiades per garantir la seguretat i confidencialitat de les dades personals, d'acord amb la LQPD i el RGPD.

10) Canvis en Aquesta Política

Ens reservem el dret de modificar aquesta política per adaptar-la a novetats legals o tècniques. Les actualitzacions es comunicaran mitjançant els canals habituals.

ALBANIA Informacion mbi mbrojtjen e të dhënave personale - Klientët në Shqipëri

Përditësimi i fundit: 21.07.25

Ky informacion shpjegon se si ne mbledhim, përdorim, ruajmë dhe mbrojmë të dhënat personale të klientëve që banojnë në Shqipëri, në përputhje me Ligjin nr. 9887, datë 10.03.2008, "Për mbrojtjen e të dhënave personale", i ndryshuar, dhe me udhëzimet e Komisionerit për të Drejtën e Informimit dhe Mbrojtjen e të Dhënave Personale (IDP).

1) Kontrolluesi i të dhënave

Quokka Sagl, Piazza Santa Lucia, 7 6900 Massagno

Emaili për privatësinë: info@quokka360.com.

Telefoni: +410919240108

2) Qëllimet e përpunimit dhe bazat ligjore

Qëllimi	Baza ligjore
Ofrimi i shërbimeve / zbatimi i kontratës	Nevoja kontraktuale (Neni 5 i Ligjit 9887)

Qëllimi

Baza ligjore

Faturimi, kontabiliteti, përmbushja fiskale Detyrim ligjor
Komunikime shërbimi Interes legjitim
Marketing i drejtpërdrejtë (email promocional) Pëlqim i shprehur
Analiza statistikore / përmirësim shërbimesh Interes legjitim ose pëlqim (nëse nuk janë të anonimizuara)

3) Kategoritë e të dhënave që përpunohen

- Të dhëna identifikuese (emri, mbiemri, data dhe vendlindja)
- Të dhëna kontakti (adresa, telefoni, emaili)
- Të dhëna financiare dhe tatimore (IBAN, fatura, pagesa)
- Informacione për kontratën dhe shërbimet
- Preferenca komunikimi (pëlqimi ose kundërshtimi ndaj marketingut)
- Të dhëna teknike për përdorimin e platformave tona

4) Mënyra e mbledhjes së të dhënave

- Të dhënat mbledhen:
- Drejtpërdrejt nga klienti në regjistrim apo lidhjen e kontratës
- Përmes formularëve online, emailit apo komunikimeve telefonike
- Automatizisht nga sistemet tona teknologjike

5) Periudha e ruajtjes së të dhënave

Të dhënat ruhen për aq kohë sa është e nevojshme për:

- Ofruar shërbimet e kërkuara
- Përmbushur detyrimet ligjore
- Mbrotur të drejtat tona në rast mosmarrëveshjes

Afatet tipike:

- Të dhënat kontraktuale: 5–10 vjet pas përfundimit të marrëdhënies
- Të dhënat për marketing: deri në tërheqjen e pëlqimit ose max. 2 vjet nga kontakti i fundit aktiv

6) Për kë ndahen të dhënat?

Të dhënat tuaja mund të ndahen me:

Marrësit

Ofrues të shërbimeve IT / cloud Hosting, mirëmbajtje sistemi, email marketing
Konsulentë fiskalë, ligjorë Përmbushje e detyrimeve ligjore
Autoritete shtetërore Vetëm në bazë të detyrimeve ligjore
Partnerë komercialë (me pëlqim) Oferta të personalizuar ose shërbime të kombinuara

Ne nuk i shesim të dhënat tuaja tek palët e treta.

7) Transferimet ndërkombëtare

Nëse të dhënat tuaja transferohen jashtë Shqipërisë apo BE/EEA, ne sigurojmë që ato të mbrohen përmes:

- Klauzole standarde kontraktuale të miratuara
- Transferimeve në vende me nivel të pranueshëm mbrojtjeje të dhënash

8) Të drejtat tuaja si subjekt i të dhënave

Ju keni të drejtë të:

E drejta

Qasje Të merrni informacion mbi të dhënat që mbajmë dhe një kopje të tyre
Korrigjim Të përmirësoni të dhëna të pasakta apo jo të plota
Fshirje Të kërkon fshirjen e të dhënave, përveç rasteve kur ekzistojnë detyrime ligjore
Kufizim përpunimi Të kufizoni përdorimin e të dhënave në rrethana të caktuara
Kundërshtim Të kundërshtoni përpunimin për marketing apo për interesa legjitime
Transferueshmëri e të dhënave Të merrni të dhënat në format të strukturuar dhe t'i transferoni te një palë tjetër
Tërheqje e pëlqimit Të tërhiqni pëlqimin në çdo kohë, pa ndikuar mbi përpunimet e mëparshme
Ankesë te autoriteti Të paraqisni një ankesë te Komisioneri për të Dhënat Personale (IDP)

Përshkrimi

9) Si të ushtroni të drejtat tuaja

Ju mund të paraqisni kërkesën tuaj në:

Email: info@quokka360.com.

Telefoni: +410919240108

10) Autoriteti Mbikëqyrës

Autoriteti kompetent është:

Komisioneri për të Drejtën e Informimit dhe Mbrojtjen e të Dhënave Personale (IDP)

Rruga "Abdi Toptani", Nr. 5, Tiranë, Shqipëri

<https://www.idp.al>

info@idp.al

11) Masat e sigurisë

Ne marrim masa teknike dhe organizative për:

- Parandalimin e qasjes së paautorizuar
- Sigurimin e ruajtjes së të dhënave
- Ruajtjen e konfidencialitetit, integritetit dhe disponueshmërisë së të dhënave

12) Ndryshime në këtë informacion

Ne mund ta përditësojmë këtë informacion sipas nevojës. Do t'ju njoftojmë për çdo ndryshim të rëndësishëm përmes emailit ose kanaleve tona zyrtare.

ALGERIA Note d'information sur la protection des données personnelles - Clients en Algérie Dernière mise à jour: 21.07.25. La présente note d'information s'adresse aux clients résidant en Algérie. Elle explique comment nous collectons, utilisons, conservons et protégeons vos données personnelles, conformément à la Loi n° 18-07 du 10 juin 2018 relative à la protection des personnes physiques dans le traitement des données à caractère personnel, ainsi qu'aux décrets d'application émis par la Commission nationale pour la protection des

données personnelles (CNPDP).

1) Responsable du traitement

Quokka Sagl, Piazza Santa Lucia, 7 6900 Massagno

Email dédié à la protection des données : info@quokka360.com.

Téléphone: +410919240108

2) Finalités et bases juridiques du traitement

Finalité du traitement	Base légale
Exécution du contrat ou prestation de services	Nécessité contractuelle (article 6 de la loi 18-07)
Obligations fiscales et comptables	Obligation légale
Service client, gestion des réclamations	Intérêt légitime
Communication marketing et promotions	Consentement explicite
Statistiques internes, amélioration des services	Intérêt légitime ou consentement si les données ne sont pas anonymisées

3) Catégories de données traitées

- Données d'identification : nom, prénom, date et lieu de naissance
- Données de contact : adresse, téléphone, email
- Données contractuelles et commerciales : services utilisés, historique de commandes
- Données de facturation et de paiement : IBAN, informations de transaction
- Consentements et préférences : abonnements marketing, autorisations données
- Données techniques : adresse IP, cookies, logs d'accès, navigation sur notre site

4) Modalités de collecte

Les données sont collectées :

- Directement auprès de vous via formulaires, email, téléphone
- Par l'utilisation de nos services en ligne
- Par des prestataires autorisés (paiement, hébergement, support technique)

5) Durée de conservation des données

Vos données sont conservées pour la durée nécessaire à :

- La fourniture de nos services
- La satisfaction de nos obligations légales
- La gestion de litiges potentiels

Exemples de durées :

- Données contractuelles : jusqu'à 10 ans
- Données marketing : 2 ans ou jusqu'au retrait du consentement
- Logs techniques : 6 à 12 mois

6) Destinataires des données personnelle

Vos données peuvent être partagées avec :

Destinataires	Motif de la communication
Personnel autorisé	Gestion opérationnelle des services
Prestataires techniques (hébergement, IT)	Support, infrastructure et sécurité
Conseillers fiscaux et juridiques	Respect des obligations légales
Autorités publiques algériennes	Réquisitions ou obligations réglementaires
Partenaires commerciaux (avec consentement)	Activités promotionnelles ou partenariats

Nous ne vendons jamais vos données à des tiers non autorisés.

7) Transferts internationaux de données

Si vos données sont transférées hors d'Algérie, cela se fera :

- Avec votre **consentement explicite**
- Vers des pays disposant d'un **niveau de protection adéquat**
- Via des **clauses contractuelles types** ou garanties similaires

8) Mesures de sécurité

Nous appliquons des mesures **techniques et organisationnelles strictes** afin de :

- Protéger vos données contre tout accès ou traitement non autorisé
- Prévenir la perte, la fuite ou l'altération des données
- Garantir la confidentialité, l'intégrité et la disponibilité des données Exemples : chiffrement, authentification à double facteur, contrôle des accès, sauvegardes régulières.

9) Vos droits

Conformément à la loi 18-07, vous disposez des droits suivants :

Droit	Description
Accès	Connaître les données traitées vous concernant et en obtenir une copie
Rectification	Corriger les données inexactes ou incomplètes
Suppression	Demander l'effacement des données dans certains cas
Opposition	Vous opposer au traitement de vos données, notamment à des fins marketing
Limitation du traitement	Restreindre temporairement l'usage de vos données dans certains cas
Retrait du consentement	Retirer votre consentement à tout moment

10) Exercice de vos droits

Pour exercer vos droits, veuillez nous contacter :

Email: info@quokka360.com.

Téléphone: [+410919240108]

Nous vous répondrons dans un délai de **30 jours ouvrables**.

11) Autorité de contrôle

Autorité compétente en Algérie :

Commission Nationale de la Protection des Données à Caractère Personnel (CNPDP)

1, Lot Said Hamdine, Bir Mourad Rais, Alger

Site officiel: [selon ProDP-africa](#).

Email: contact.anpdp@anpdp.dz

12) Mises à jour de la présente note

Nous nous réservons le droit de modifier la présente note en cas d'évolution légale ou technique. Toute modification substantielle vous sera notifiée via nos canaux officiels.

ANTIGUA E BARBUDA BARBUDA Data Protection Notice - Customers in Antigua and Barbuda

Last updated: 21.07.25. This notice describes how we collect, use, store and protect the personal data of customers residing in Antigua and Barbuda, in accordance with the Data Protection Act, 2013, which protects the rights of individuals in relation to the processing of their personal information.

1) Data controller

Quokka Sagl, Piazza Santa Lucia, 7 6900 Massagno

Email: info@quokka360.com.

Phone: +410919240108

2) Purpose and legal basis for processing

We process your personal data exclusively for legitimate purposes, as provided by law. The main ones are:

Purposes	Legal basis
Provision of requested products and services	Performance of a contract
Management of orders, payments and shipments	Contractual necessity
Customer communications	Legitimate interest
Direct marketing (email, newsletters, offers)	Explicit consent
Legal, tax or regulatory compliance	Legal obligation
Fraud prevention and system security	Legitimate interest / regulatory obligation
Service improvement and statistical analysis	Legitimate interest / consent, if necessary

3) Categories of data collected

- Identification data: name, surname, date of birth
- Contact data: address, telephone number, email address
- Contractual data: purchase, registration and preference data
- Payment data: credit/debit card details, IBAN, receipts
- Technical data: IP address, device type, browsing data, cookies

4) Method of data collection

Data are collected through:

- Online or paper forms
- Communications via email or telephone
- Interactions with our website or app
- Payment services or authorised third-party providers

5) Data retention

We retain personal data for no longer than is necessary for the purposes for which it was collected. In particular:

Type of data	Indicative retention period
Contractual data	Up to 7 years (for tax and legal obligations)
Marketing data	Up to 2 years or until consent is withdrawn
Technical and access data	6 months to 1 year, depending on purpose

6) Sharing of data

Personal data may be shared with:

Recipients	Reason
Employees and authorised contractors	Provision of requested services
Service providers (hosting, IT, logistics)	Operational and technical management
Tax and legal consultants	Regulatory compliance
Government authorities (if required)	Compliance with applicable laws
Third parties for promotional purposes	Only with explicit consent

We never sell your personal data to third parties.

7) International data transfers

If we transfer your personal data outside Antigua and Barbuda, we take all necessary measures to ensure an adequate level of protection, for example:

- Transfer to countries with equivalent privacy laws
- Use of standard contractual clauses (SCC)
- Obtaining your explicit consent

8) Data security

We take technical and organisational measures to protect your personal data, including:

- Data encryption
- Role-based access control
- Regular backups
- Systems security monitoring

9) Data subject rights

In accordance with the Data Protection Act, you have the following rights:

Right	Description
Access	Obtaining confirmation of the existence of your data and receiving a copy
Rectification	Correcting inaccurate or incomplete data
Deletion	Requesting the removal of data in certain cases
Limitation of processing	Restricting the use of your data in certain circumstances

Right	Description
Opposition	Objecting to processing for legitimate reasons, including direct marketing
Portability	Receiving data in a readable format or requesting its transfer
Withdrawal of consent	Withdrawing consent at any time, without prejudice to previous processing

10) How to exercise your rights

You can send a written request to

Email: info@quokka360.com.

Phone: +410919240108

Requests will be reviewed and dealt with within 30 days.

11) Competent supervisory authority

If you feel that your rights have not been respected, you can contact your local data protection authority:

Supervisory Authority (Data Commissioner) Government of Antigua and Barbuda

12) Changes to this policy

We reserve the right to update this policy from time to time to reflect legislative or operational changes. We will notify you of relevant changes via the website or by email.

ARABIA SAUDITA

إشعار حماية البيانات الشخصية – العملاء في المملكة العربية السعودية آخر تحديث: [تاريخ التحديث]

يصف هذا الإشعار كيفية جمعنا واستخدامنا وحفظنا وحمايتنا لبياناتك الشخصية إذا كنت مقيماً في المملكة العربية السعودية، وذلك وفقاً لنظام حماية البيانات الشخصية

السعودي (وتحت إشراف الهيئة السعودية للبيانات والذكاء الاصطناعي ()

(1) من نحن (جهة التدقيق في البيانات

Quokka Sagl, Piazza Santa Lucia, 7 6900 Massagno

البريد الإلكتروني: [للمراسلة]

رقم الاتصال: [رقم الهاتف]

مسؤول حماية البيانات (إن وجد): [الاسم وبيانات الاتصال]

(2) الغرض والأساس القانوني لمعالجة البيانات

نقوم بمعالجة بياناتك الشخصية للأغراض التالية ووفقاً لما يسمح به نظام حماية البيانات

الغرض	الأساس القانوني (وفقاً)
تنفيذ العقود والخدمات	المادة 6 - ضرورة تعاقدية
إدارة الطلبات والمدفوعات والتوصيل	المعالجة القانونية والمناسبة
التواصل مع العملاء	مصلحة مشروعة أو ضرورة تعاقدية
التسويق المباشر	بموافقة صريحة فقط
الامتثال للالتزامات القانونية والضريبية	الالتزام قانوني
الحماية من الاحتيال وتأمين الأنظمة	مصلحة مشروعة
التحليل الإحصائي وتحسين الخدمات	الموافقة أو إخفاء الهوية حسب الحالة

أنواع البيانات التي نقوم بجمعها (3)

البيانات الشخصية: الاسم، رقم الهوية الوطنية

معلومات الاتصال: العنوان، البريد الإلكتروني، الهاتف

معلومات الدفع: بيانات الحساب البنكي، بطاقات الدفع

الجهاز، أنماط التصفح، IP، البيانات التقنية: عنوان

بيانات الطلبات: المنتجات المشتراة، التفضيلات

الموافقات: اختيارات التسويق، الاشتراكات، السحب

(4) كيف نجمع البيانات؟

- نجمع البيانات من خلال:
- النماذج الإلكترونية أو الورقية
- البريد الإلكتروني أو المراسلات الهاتفية
- التفاعل مع الموقع أو التطبيق
- المصادر العامة أو شركائنا الموثوقين
- تقنيات التتبع (مثل ملفات تعريف الارتباط) - بموافقتك

مدة حفظ البيانات (5)

نحتفظ ببياناتك فقط للمدة اللازمة لتحقيق الأغراض المحددة

نوع البيانات	مدة الحفظ
بيانات الهوية الشخصية	من 5 إلى 10 سنوات بحسب المتطلبات النظامية
بيانات التسويق	حتى سحب الموافقة أو لمدة أقصاها ستان
السجلات التقنية	من 6 إلى 12 شهراً
بيانات النزاعات	حتى الانتهاء من المعالجة القانونية

6) أمن البيانات

نطبق إجراءات أمنية وفق المادة 18 من النظام، منها:

- التشفير أو التدمير للبيانات
- التدمير أو الوصول حسب الصلاحيات
- الحماية من الهجمات الإلكترونية
- آليات الإخطار في حال حدوث خرق أمن، خلال 72 ساعة

7) نقل البيانات خارج المملكة

- وفق المادة 29 من النظام
- لا يجوز نقل البيانات خارج المملكة إلا بشروط صارمة، منها
- وجود ضرورة تجارية أو تعاقدية
- توفير مستوى حماية مناسب في الدولة المستقبلة
- الحصول على موافقتك الصريحة عند اللزوم
- الحصول على موافقتها حسب الحالة SDAIA إخطار

8) حقوقكم كمستخدم

لديك الحقوق التالية:

الوصف	الحق
الاطلاع على بياناتك والحصول على نسخة منها	الحق في الوصول
تصحيح البيانات غير الصحيحة أو الناقصة	الحق في التصحيح
حذف البيانات في حالات معينة	الحق في الحذف
الحصول على نسخة قابلة للنقل من بياناتك	الحق في نقل البيانات
الاعتراض على استخدام البيانات لأغراض معينة مثل التسويق	الحق في الاعتراض
طلب إيقاف مؤقت للمعالجة في ظروف معينة	الحق في تقييد المعالجة
عند وجود انتهاك لحقوقك SDAIA تقديم شكوى إلّا	الحق في تقديم شكوى

9) كيفية ممارسة حقوقك

يرجى التواصل معنا عبر:

Email: info@quokka360.com.

Phone: +410919240108

سنرد خلال 30 يومًا من تاريخ الطلب.

10) الهيئة المختصة

(SDAIA) الهيئة السعودية للبيانات والذكاء الاصطناعي

الرياض - المملكة العربية السعودية

<https://sdaia.gov.sa>

info@sdaia.gov.sa

11) تحديثات إشعار الخصوصية

قد يتم تعديل هذا الإشعار وفق:

- تغييرات قانونية
- تطوير خدماتنا أو أهداف الاستخدام
- SDAIA تحديثات صادرة عن

سنبلغك بأي تغييرات جوهرية عبر البريد الإلكتروني أو على موقعنا.

ARMENIA Անձնական տվյալների պաշտպանության տեղեկատվությունը՝ Հայաստանի Հանրապետությունում բնակվող հաճախորդների համար

Թարմացման վերջին օր: 21.07.25.

Այս տեղեկատվությունը բացատրում է, թե ինչպես ենք մենք հավաքում, օգտագործում, պահպանում և պաշտպանում Ձեր անձնական տվյալները՝ համաձայն ՀՀ օրենսդրության, մասնավորապես՝ «Անձնական տվյալների պաշտպանության մասին» ՀՀ օրենքի, ընդունված 2015 թ., հետագա փոփոխություններով, որը վերահսկվում է ՀՀ Արդարադատության նախարարության Անձնական տվյալների պաշտպանության գործակալության կողմից:

1) Տվյալների վերահսկող սուբյեկտը

Quokka Sagl, Piazza Santa Lucia, 7 6900 Massagno

Գաղտնիության էլ. հասցե՝ info@quokka360.com.

Հեռախոսահամար՝ +410919240108

2) Տվյալների մշակման նպատակներն ու իրավական հիմքերը

Մենք մշակում ենք Ձեր տվյալները հետևյալ նպատակներով՝ համաձայն ՀՀ օրենքի՝

Մշակման նպատակ

Իրավական հիմք

Պայմանագրերի և պատվերների իրականացում

Պայմանագրի կատարում (Հոդված 6, մաս 1)

Մշակման նպատակ

Հաճախորդների սպասարկում և հաղորդակցություն
Ուղիղ մարքեթինգ (email, հեռախոս)
Իրավական և հարկային պարտավորությունների կատարում
Ծառայությունների վերլուծություն և կատարելագործում
Անվտանգություն և խարդախության կանխարգելում

Իրավական հիմք

Իրավահավանական շահ կամ համաձայնություն
Միայն հստակ համաձայնությամբ
Իրավական պարտավորություն
Համաձայնություն կամ անառնում տվյալներ
Իրավահավանական շահ

3) Հավաքվող տվյալների տեսակները

- Նույնականացման տվյալներ՝ անուն, ազգանուն, անձնագրի կամ նույնականացման համար
- Կոնտակտային տվյալներ՝ Էլ. փոստ, հեռախոս, հասցե
- Վճարային տվյալներ՝ բանկային տվյալներ, քարտային տեղեկատվություն
- Տեխնիկական տվյալներ՝ IP հասցե, սարքավորում, օգտագործման տվյալներ
- Նախընտրություններ և արձագանքներ
- Տրված համաձայնություններ

4) Տվյալների հավաքման եղանակներ

Տվյալները կարող ենք հավաքել՝
- Առցանց ձևերի միջոցով
- Էլ. փոստով, հեռախոսով կամ գրավոր կապով
- Կայքի և հավելվածի օգտագործմամբ
- Գործընկեր կազմակերպությունների միջոցով
- Cookie-ների և նմանատիպ տեխնոլոգիաների միջոցով (համաձայնությամբ)

5) Պահպանման ժամկետներ

Տվյալների տեսակ

Պայմանագրային տվյալներ
Մարքեթինգային տվյալներ
Տեխնիկական տվյալներ
Դատական գործընթացների տվյալներ Մինչև գործընթացի ավարտը

Պահպանման ժամկետ

5-10 տարի՝ իրավական պահանջներից կախված
Մինչև համաձայնության հետ կանչը կամ առավելագույնը՝ 2 տարի
6-12 ամիս

6) Տվյալների անվտանգություն

Մենք կիրառում ենք համապատասխան տեխնիկական և կազմակերպչական միջոցներ՝
- Կոդավորում (գաղտնագրում) և տվյալների մասնատում
- Անհատական մուտքի վերահսկում
- Հակահարձակ պաշտպանության համակարգեր
- Տվյալների խախտման դեպքում 72 ժամվա ընթացքում ծանուցում
7) Տվյալների փոխանցում Հայաստանից դուրս

Ըստ ՀՀ օրենսդրության՝
- Տվյալները կարող են փոխանցվել այն երկրներ, որոնք ապահովում են համարժեք պաշտպանության մակարդակ
-

Այլ դեպքերում՝ անհրաժեշտ է օգտագործել պաշտոնական համաձայնագրեր, համաձայնություն, կամ այլ իրավական երաշխիքներ

- Փոխանցման մասին կարող է անհրաժեշտ լինել տեղեկացնել լիազոր մարմնին

8) Ձեր իրավունքները՝ որպես տվյալների սուբյեկտ

Իրավունք

Տվյալներին հասանելիության իրավունք
Ուղղման իրավունք
Ձեռման իրավունք
Մշակման սահմանափակման իրավունք
Տվյալների փոխանցման իրավունք
Մշակմանը առարկելու իրավունք
Համաձայնության հետ կանչման իրավունք
Բոլոր ներկայացնելու իրավունք

Նկարագրություն

Տեսնել, թե ինչ տվյալներ ենք մշակում և ստանալ դրանց պատճենը
Միայն կամ անավարտ տվյալների ուղղում
Տվյալների ջնջում՝ որոշ դեպքերում
Ժամանակավորապես դադարեցնել մշակումը
Տվյալները ստանալ մեքենայաբար ընթերցելի ձևաչափով
Առարկել տվյալների որոշ օգտագործման դեմ, օրինակ՝ մարքեթինգ
Ցանկացած պահին չեղարկել համաձայնությունը

Դիմել ՀՀ Արդարադատության նախարարության անձնական տվյալների պաշտպանության գործակալությանը

9) Ինչպե՞ս իրացնել ձեր իրավունքները

Դուք կարող եք դիմել մեզ՝

Էլ. հասցե՝ info@quokka360.com.

Հեռախոս՝ +410919240108

Մեր պատասխանը կտրամադրվի 30 օրվա ընթացքում՝ օրենսդրությամբ սահմանված կարգով:

10) Վերահսկող մարմին

Անձնական տվյալների պաշտպանության գործակալություն

ՀՀ Արդարադատության նախարարություն info@quokka360.com. <https://www.moj.am>

11) Տեղեկատվության թարմացումներ

Այս տեղեկատվությունը կարող է փոփոխվել՝

- Նոր օրենսդրական փոփոխությունների
- Ծառայությունների ընդլայնման կամ տեխնոլոգիական նորամուծությունների դեպքում
-

Կարգավորող մարմինների պահանջների հիման վրա Փոփոխությունների մասին տեղեկացումը կտրամադրվի Ձեզ հասնելի եղանակով:

BENIN Politique de confidentialité - Clients résident au Bénin

Dernière mise à jour : 21.07.25. La présente politique de confidentialité décrit comment nous collectons, utilisons, conservons et protégeons les données personnelles des clients résidant en République du Bénin, conformément à la Loi n° 2017-20 du 20 avril 2018 portant Code du Numérique, notamment au Livre V relatif à la protection des données à caractère personnel, sous la supervision de l'Autorité de Protection des Données Personnelles (APDP).

1) Qui sommes-nous (Responsable du traitement)

Quokka Sagl, Piazza Santa Lucia, 7 6900 Massagno

Email pour les questions relatives à la confidentialité : info@quokka360.com.

Téléphone : +410919240108

2) Finalités du traitement et bases légales

Conformément aux articles 431-1 et suivants du Code du Numérique du Bénin, nous traitons vos données personnelles aux fins suivantes et sur les bases légales correspondantes :

Finalité du traitement	Base légale
Gestion des contrats, commandes et transactions	Exécution d'un contrat (art. 431-6)
Service client et communication	Intérêt légitime ou consentement
Marketing et prospection (email, SMS, etc.)	Consentement explicite et éclairé (art. 431-7)
Obligations fiscales, comptables et légales	Obligation légale
Analyse et amélioration de nos services	Intérêt légitime ou consentement
Prévention de la fraude, sécurité informatique	Intérêt légitime et obligations de sécurité prévues par le Code du Numérique

3) Types de données collectées

Nous collectons uniquement les données pertinentes, parmi lesquelles :

- Données d'identification : nom, prénom, numéro de pièce d'identité, date de naissance
- Données de contact : adresse postale, email, numéro de téléphone
- Données financières : coordonnées bancaires, historique de paiement
- Données techniques : adresses IP, géolocalisation, cookies, données de connexion
- Préférences et historique d'utilisation de nos services
- Preuves de consentement spécifique

4) Méthodes de collecte

Les données sont collectées via :

- Formulaires en ligne ou papier
- Échanges par email ou téléphone
- Utilisation de notre site internet ou application mobile
- Partenaires commerciaux ou tiers autorisés (sous garanties adéquates)
- Cookies et outils de traçage (avec consentement lorsque requis)

5) Durée de conservation des données

Vos données personnelles sont conservées uniquement pendant la durée nécessaire aux finalités poursuivies :

Type de données	Durée de conservation
Données contractuelles	10 ans, pour raisons légales et fiscales
Données marketing	Jusqu'au retrait du consentement ou max. 3 ans sans activité
Données techniques	12 mois (sauf prolongation pour des raisons de sécurité)
Données liées à un litige	Jusqu'à la clôture définitive de la procédure

6) Mesures de sécurité

Conformément à l'article 434 du Code du Numérique, nous mettons en œuvre les mesures techniques et organisationnelles appropriées pour garantir la sécurité, la confidentialité et l'intégrité des données

- Contrôles d'accès et authentification forte
- Chiffrement des données sensibles
- Pare-feu, antivirus et surveillance des systèmes
- Formation continue de notre personnel
- Procédures de gestion des violations (notification à l'APDP sous 72h)

7) Transferts internationaux de données

Selon les articles 434-18 et suivants :

- Les données peuvent être transférées vers des pays offrant un **niveau de protection adéquat**, reconnu par l'APDP
- En l'absence de reconnaissance, des **garanties appropriées** sont mises en place (clauses contractuelles types, consentement explicite, etc.)

8) Vos droits en tant que personne concernée

Selon les articles 434-1 et suivants du Code du Numérique, vous disposez des droits suivants :

Droit	Description
Droit d'accès	Obtenir la confirmation et copie des données traitées
Droit de rectification	Corriger des données inexacts ou incomplètes
Droit à l'effacement	Demander la suppression des données, sous conditions légales
Droit d'opposition	S'opposer à certains traitements pour motifs légitimes
Droit à la portabilité	Recevoir les données dans un format structuré et lisible
Droit à la limitation du traitement	Demander une suspension temporaire du traitement
Droit de retirer son consentement	À tout moment, sans affecter la légalité des traitements passés
Droit de réclamation	Auprès de l'Autorité de Protection des Données Personnelles (APDP)

9) Exercice de vos droits

Vous pouvez exercer vos droits en envoyant une demande écrite à :

Email : info@quokka360.com.

Phone: +410919240108

Nous répondrons dans un délai maximum de 30 jours, sauf prorogation justifiée.

10) Autorité de contrôle

Autorité de Protection des Données Personnelles (APDP)

Cotonou, Bénin

Site officiel : <https://www.apdp.bj>

Email : contact@apdp.bj

11) Mises à jour de la présente politique

Cette politique peut être modifiée en cas de :

- Changements législatifs au Bénin ou internationaux
- Nouvelles finalités de traitement
- Évolutions technologiques impactant la confidentialité

En cas de mise à jour, vous serez informé(e) de manière claire et appropriée.

CANADA - Privacy Policy - Customers Residing in Canada

Last updated: 21.07.25. This privacy policy describes how [Company Name] collects, uses, stores, discloses, and protects the personal data of customers residing in Canada, in accordance with applicable federal and provincial privacy laws, including:

- PIPEDA (Personal Information Protection and Electronic Documents Act – federal law)
- Relevant provincial laws (e.g., Quebec's Private Sector Privacy Act)
- Any applicable industry-specific codes or regulations.

1) Data Controller

Quokka Sagl, Piazza Santa Lucia, 7 6900 Massagno

Privacy contact email: info@quokka360.com.

Phone: +410919240108

2) Types of Personal Data We Collect

We may collect the following categories of personal information:

- Identification data: name, surname, date of birth, ID number
- Contact details: address, phone number, email
- Financial data: payment information, bank details
- Commercial data: purchase history, preferences, feedback
- Technical data: IP addresses, access logs, cookies, navigation data
- Other data: data from complaints, requests, or interactions with customer service

3) Purposes of Processing and Legal Basis

We process your personal data for the following purposes:

Purpose	Legal Basis
Contract performance and order management	Contract execution
Customer communications	Legitimate interest / Consent
Direct marketing (email, SMS, push notices)	Express consent (per Section 6 of PIPEDA)
Billing and compliance with legal obligations	Legal obligation
Service improvement and analytics	Legitimate interest (preferably anonymized or aggregated data)
Fraud prevention and IT security	Legal obligation / Legitimate interest

Consent is required in **explicit form** for sensitive data processing and can be **withdrawn at any time**.

4) How We Collect Personal Data

We may collect personal data via:

- Account or newsletter registration
- Online or offline forms
- Communications by email, phone, or chat
- Website or app usage
- Third parties (e.g., partners, service providers) under appropriate safeguards

5) Data Retention Period

We retain personal data only as long as necessary to fulfill the purposes described:

Type of Data	Retention Period
Contractual and transactional data	7 years (for tax and accounting purposes)
Marketing data	Until consent is withdrawn or after 3 years of inactivity
Technical data (logs, cookies)	12 months, unless extended for security purposes
Complaint or litigation data	Until the conclusion of the relevant proceedings

6) Data Security

We adopt technical and organizational measures in line with **PIPEDA's safeguarding principles**, including:

- Data encryption (in transit and at rest)
- Multi-factor authentication for system access
- Role-based access controls
- Data retention and secure destruction policies
- Data breach response and notification procedures (mandatory reporting to authorities and affected individuals in serious cases)

7) International Data Transfers

If your data is transferred outside of Canada (e.g., to providers in the US or EU), we ensure:

- The destination country provides adequate protection, or
- Appropriate contractual safeguards are in place (e.g., standard contractual clauses)
- The transfer is necessary for the provision of the requested service

8) Your Rights as a Data Subject

Under PIPEDA, you have the following rights:

Right	Description
Right to access	Obtain confirmation and a copy of your personal data held by us
Right to correction	Correct inaccurate or incomplete data
Right to deletion	Request erasure of data, when no longer necessary
Right to data portability	Receive your data in a structured format and transmit it elsewhere
Right to withdraw consent	Withdraw your previously given consent at any time
Right to file a complaint	Lodge a complaint with the competent authority (OPC)

9) How to Exercise Your Rights

You may exercise your rights at any time by contacting us at:

Email: info@quokka360.com.

Phone: +410919240108

We will respond within **30 days** as required by law.

10) Supervisory Authority

Office of the Privacy Commissioner of Canada (OPC)

30 Victoria Street, Gatineau, Quebec, K1A 1H3

<https://www.priv.gc.ca>

1-800-282-1376

Note: If you reside in Quebec, Alberta, or British Columbia, specific provincial laws and local privacy commissioners may apply.

11) Updates to This Policy

This policy may be updated periodically. In case of significant changes, we will notify you through our official channels (e.g., website, email).

ECUADOR - Política de Privacidad - Clientes residentes en Ecuador

Última actualización: 21.07.25.

Esta política tiene como objetivo proporcionar transparencia sobre el tratamiento de los datos personales por parte de **[Nombre de la empresa]**, conforme a la **Ley Orgánica de Protección de Datos Personales (LOPD)** vigente en Ecuador desde el 26 de mayo de 2021.

1) Responsable del tratamiento

Quokka Sagl, Piazza Santa Lucia, 7 6900 Massagno

Correo electrónico de contacto: info@quokka360.com.

Teléfono: +410919240108

2) Tipos de datos personales que recopilamos

Podemos recopilar y tratar las siguientes categorías de datos personales:

- Datos identificativos: nombre, apellidos, número de identificación, fecha de nacimiento

- Datos de contacto: dirección, correo electrónico, número de teléfono

- Datos financieros: información de pago, datos bancarios

- Datos comerciales: historial de compras, preferencias, comunicaciones

- Datos técnicos: dirección IP, cookies, identificadores de dispositivos

- Datos sensibles (solo con consentimiento explícito): por ejemplo, datos biométricos o de salud, si corresponde

3) Finalidades del tratamiento y bases legales

Finalidad	Base legal
Prestación de productos y servicios	Ejecución de contrato
Gestión administrativa y contable	Obligación legal
Marketing directo y promociones	Consentimiento explícito
Análisis y mejora de servicios	Interés legítimo, cuando sea aplicable
Seguridad de sistemas y prevención del fraude	Obligación legal / Interés legítimo
Respuesta a solicitudes o reclamos	Interés legítimo / Obligación legal

El consentimiento será recabado de forma **libre, específica, informada e inequívoca** cuando sea necesario

4) Plazo de conservación de los datos

Tipo de datos	Período de conservación
Datos contractuales	7 años (conforme a obligaciones contables o fiscales)
Datos para fines de marketing	Hasta revocación del consentimiento o máximo 2 años
Datos relacionados con reclamos	Hasta la resolución y 5 años adicionales
Registros técnicos (logs/cookies)	Hasta 1 año, salvo prórrogas justificadas

5) Medidas de seguridad

Implementamos medidas técnicas y organizativas adecuadas para garantizar:

- La confidencialidad e integridad de los datos

- Cifrado de datos sensibles

- Autenticación multifactor para el acceso a sistemas

- Controles de acceso basados en roles

- Protocolos de respuesta ante incidentes y notificación de brechas de seguridad

6) Transferencia internacional de datos

En caso de transferencias internacionales:

- Verificamos si el país de destino proporciona **protección adecuada**

- Si no, aplicamos **garantías contractuales apropiadas** (como cláusulas contractuales tipo)

- Informamos al titular de forma clara y transparente conforme exige la LOPDP

7) Derechos del titular de los datos

De acuerdo con la LOPDP, usted tiene los siguientes derechos:

Derecho	Descripción
Derecho de acceso	Saber si tratamos sus datos personales y obtener una copia
Derecho de rectificación	Corregir datos inexactos o incompletos
Derecho de supresión	Solicitar la eliminación de los datos, salvo que exista obligación legal
Derecho de oposición	Oponerse al tratamiento por motivos legítimos o para fines publicitarios
Derecho de portabilidad	Recibir sus datos en un formato estructurado y transmitirlos a otro responsable
Derecho a revocar el consentimiento	En cualquier momento, sin afectar tratamientos anteriores
Derecho a no ser sujeto de decisiones automatizadas	Salvo consentimiento explícito
Derecho a presentar una reclamación	Ante la Autoridad de Protección de Datos Personales del Ecuador

8) Ejercicio de derechos

Puede ejercer sus derechos de forma gratuita a través de:

Email: [correo dedicado a la privacidad]

Teléfono: [número de contacto]

Dirección postal: [dirección física]

Respondemos en un plazo máximo de **15 días hábiles**, prorrogable si el caso lo requiere.

9) Autoridad de control

Autoridad de Protección de Datos Personales del Ecuador

Email: info@quokka360.com.

Phone: +410919240108

10) Cambios en esta política

Nos reservamos el derecho a modificar esta política. En caso de cambios sustanciales, se le notificará por nuestros canales oficiales (sitio web, correo electrónico, etc.).

EMIRATI ARABI UNITI - Privacy Notice - Customers Residing in the United Arab Emirates

Last updated: 21.07.25. This privacy notice explains how **[Company Name]** collects, uses, stores, discloses, and protects personal data of customers residing in the **United Arab Emirates**, in accordance with **Federal Decree-Law No. 45 of 2021 on the Protection of Personal Data (PDPL)** and applicable local laws, including those of free zones such as DIFC and ADGM, where relevant.

1) Data Controller

Quokka Sagl, Piazza Santa Lucia, 7 6900 Massagno

Privacy contact email: info@quokka360.com. Phone: +410919240108

2) Categories of Personal Data Collected

We may process the following types of personal data:

- Identification data: full name, date of birth, nationality, passport or Emirates ID
- Contact data: phone number, email address, residential address
- Financial data: payment information, bank details
- Behavioral data: purchase history, preferences, feedback
- Technical data: IP address, device identifiers, cookies, access logs
- Sensitive personal data: biometric or health data (processed only with explicit consent, if applicable)

3) Purpose and Legal Basis for Processing

Purpose	Legal Basis under PDPL
Providing products and services	Performance of a contract
Customer management, assistance and billing	Legal obligation / Contractual necessity
Marketing communications and promotional offers	Explicit consent
Service improvement and customer analytics	Legitimate interest (balanced)
IT security and fraud prevention	Legal obligation / Legitimate interest
Compliance with regulatory and legal obligations	Legal obligation under federal or local UAE law

Explicit consent is **required** for the processing of sensitive personal data or international transfers where adequate protection is not ensured.

4) Data Retention Period

Personal data will be stored only as long as necessary for the purposes for which it was collected:

Type of Data	Retention Period
Contractual and financial data	Up to 7 years (for accounting or legal purposes)
Marketing data	Until consent is withdrawn or up to 2 years from last interaction
Technical and access logs	Up to 12 months unless extended for security or legal reasons
Complaints and legal records	Until resolved and archived for an additional 5 years

5) Data Security Measures

We implement appropriate technical and organizational security measures, as required by the PDPL, including:

- Encryption of data at rest and in transit
- Role-based access control
- Multi-factor authentication (MFA)
- Continuous monitoring for unusual or suspicious activity
- Incident response plans and data breach notification protocols

6) International Data Transfers

When transferring personal data outside the UAE:

- We ensure the destination country offers an **adequate level of protection**, or
- We implement **appropriate contractual safeguards** (e.g., standard contractual clauses), or
- Where neither is possible, we request your **explicit consent** prior to the transfer

7) Data Subject Rights under the PDPL

You have the following rights under the UAE PDPL:

Right	Description
Access	Obtain confirmation whether your data is being processed and access to it
Rectification	Correct inaccurate or incomplete personal data
Erasure (Right to be Forgotten)	Request deletion of your data under specific conditions
Restriction of processing	Request temporary suspension of processing under specific circumstances
Data portability	Receive your data in a structured, machine-readable format
Object to processing	Object to processing based on legitimate interest
Withdraw consent	Withdraw previously given consent at any time
File a complaint	Lodge a complaint with the UAE Data Office or relevant local authority

8) How to Exercise Your Rights

To exercise your rights, please contact us at:

Email: info@quokka360.com.

Phone: +410919240108

We aim to respond to all requests within **30 calendar days**, in compliance with applicable law.

9) Supervisory Authority

UAE Data Office

Abu Dhabi, United Arab Emirates

Website: <https://u.ae>

[Official email – once publicly available]

If your data is processed within free zones such as DIFC or ADGM, the respective authorities are:

DIFC Data Protection Commissioner <https://www.difc.ae/business/operating/data-protection/>

ADGM Office of Data Protection <https://www.adgm.com/operating-in-adgm/data-protection>

10) Changes to This Privacy Notice

We reserve the right to modify this privacy notice at any time. In the event of material changes, we will notify you through official channels such as our website or email.

HONG KONG - Privacy Notice - Customers Residing in Hong Kong

Last updated: 21.07.25. This privacy notice explains how [Company Name] collects, uses, stores, discloses, and protects the personal data of individuals residing in Hong Kong, in accordance with the Personal Data (Privacy) Ordinance (PDPO), Cap. 486, and guidance issued by the Office of the Privacy Commissioner for Personal Data (PCPD).

1) Data Controller

Quokka Sagl, Piazza Santa Lucia, 7 6900 Massagno

Privacy contact email: info@quokka360.com.

Telephone: +410919240108

2) Categories of Personal Data Collected

We may collect and process the following categories of personal data:

- Identity Data: full name, title, date of birth, gender, nationality
- Contact Data: address, phone number, email address
- Financial Data: payment details, bank account number, transaction history
- Technical Data: IP address, browsing behavior, cookies, device IDs
- Usage Data: purchase history, preferences, feedback, complaints
- Other Data: content shared via forms, customer service, social media

Purpose

- Provision of requested goods/services
- Customer support and account management
- Direct marketing via email or messages
- Regulatory or tax compliance
- IT security and fraud prevention
- Responding to requests from authorities

Legal Basis under PDPO

- Contractual necessity
- Legitimate interest
- Explicit consent (opt-in)
- Legal obligation
- Legitimate interest / Legal obligation
- Legal obligation

Under the PDPO, **explicit consent is required for direct marketing activities**. You may withdraw your consent at any time.

4) Data Retention. We retain personal data only for as long as necessary for the purposes for which it was collected:

Type of Data

Retention Period

- | | |
|---------------------------|---|
| Contract and billing data | 7 years (in line with local tax and accounting regulations) |
| Marketing data | Until consent is withdrawn or 24 months of inactivity |
| Technical logs | 12 months unless extended for security or legal reasons |
| Complaint/legal records | Until resolved, and archived for up to 6 years |

5) Data Security Measures. We implement appropriate technical and organizational security measures, including:

- Data encryption (at rest and in transit)
- Role-based access controls and authentication
- Security monitoring and incident detection
- Backup and disaster recovery systems
- Staff training on privacy and data protection

6) International Data Transfers. When personal data is transferred outside Hong Kong:

- We ensure that the recipient provides a level of protection comparable to the PDPO
- We adopt **contractual safeguards** such as data transfer agreements
- Where required, we obtain your **explicit consent** prior to the transfer

The PCPD recommends informing data subjects **before transferring data overseas**, and applying appropriate safeguards.

7) Your Rights under the PDPO. You have the following rights under the Personal Data (Privacy) Ordinance:

Right

Description

- | | |
|----------------------------|---|
| Access | Request access to your personal data and confirmation of processing |
| Correction | Request correction of inaccurate or incomplete personal data |
| Object to direct marketing | Opt out of any use of your data for direct marketing purposes |
| Withdraw consent | Withdraw your consent to processing at any time |
| Cease processing request | Request cessation of data use under certain conditions |

8) How to Exercise Your Rights.

To exercise your rights, please contact us at:

Email: info@quokka360.com.

Phone: +410919240108

We aim to respond within 40 calendar days, as required under the PDPO.

9) Supervisory Authority

Office of the Privacy Commissioner for Personal Data (PCPD)

12/F, Sunlight Tower, 248 Queen's Road East, Wanchai, Hong Kong

<https://www.pcpd.org.hk>

+852 2827 2827

communications@pcpd.org.hk

10) Changes to This Privacy Notice

We reserve the right to amend this privacy notice at any time. In case of material changes, we will notify you through our official website or via email.

SUD AFRICA - Privacy Notice - Customers Residing in South Africa

The official English version of the detailed privacy notice for customers residing in South Africa, compliant with the Protection of Personal Information Act (POPIA), No. 4 of 2013:

Last updated: 21.07.25. This Privacy Notice outlines how [Company Name] collects, uses, stores, discloses, and protects personal information of individuals located in South Africa, in compliance with the Protection of Personal Information Act, 2013 (POPIA) and applicable guidance issued by the Information Regulator of South Africa.

1) Responsible Party (Data Controller)

Quokka Sagl, Piazza Santa Lucia, 7 6900 Massagno

Privacy Contact Email: info@quokka360.com.

Contact Number: +410919240108

2) Categories of Personal Information Collected

We may collect and process the following categories of personal information:

- Identity Information: name, surname, South African ID number or passport number
- Contact Information: residential or business address, telephone number, email address
- Financial Information: bank account details, payment data, transaction records
- Technical Information: IP address, browser logs, access timestamps, cookies
- Commercial Data: order history, preferences, communications
- Special Personal Information (e.g., health, biometrics, race, religious beliefs): processed only with explicit consent or legal authorization

3) Purpose of Processing and Legal Basis

Purpose of Processing	Legal Justification under POPIA
Providing products/services requested	Contractual necessity
Managing customer relationships	Legitimate interest
Sending marketing communications	Explicit consent (opt-in)
Compliance with tax, regulatory or legal duties	Legal obligation
IT security, fraud prevention, risk management	Legitimate interest / Legal obligation
Responding to government or authority requests	Legal obligation

POPIA requires **prior, voluntary, and informed consent** for direct marketing using electronic means. You may withdraw your consent at any time.

4) Data Retention Period

Personal information is retained only for as long as is necessary for the specific purpose for which it was collected:

Type of Information	Retention Period
Contractual and invoicing data	5 years (in accordance with the Tax Administration Act)
Marketing data	Until consent is withdrawn or 24 months of inactivity
Technical logs	12 months, unless required longer for legal or security needs
Complaint/legal data	Until resolved + up to 5 years for legal protection

5) Data Security and Safeguards

We apply appropriate technical and organisational safeguards to protect your personal information, including:

- Data encryption (in transit and at rest)
- Access control based on roles and authorisation
- Secure IT infrastructure and real-time monitoring
- Periodic penetration testing and vulnerability assessments
- Ongoing employee training on POPIA compliance

6) International Data Transfers

Where your personal information is transferred outside of South Africa:

- We ensure the recipient country or entity maintains a level of data protection comparable to POPIA
- We rely on standard contractual clauses, where applicable
- We inform you in advance and may obtain your explicit consent, where required

POPIA prohibits cross-border transfers unless adequate protection mechanisms are in place or consent is obtained.

7) Your Rights Under POPIA

As a data subject, you are entitled to the following rights under the POPIA:

Right	Description
Right of Access	Request confirmation and a copy of the personal information held
Right to Correction	Request correction or updating of inaccurate or outdated data
Right to Deletion	Request deletion of data no longer required or unlawfully held
Right to Object to Processing	Object to certain processing on reasonable grounds
Right to Withdraw Consent	Withdraw consent at any time (e.g., for marketing communications)
Right to Lodge a Complaint	File a complaint with the Information Regulator

8) How to Exercise Your Rights

To exercise your rights, please contact us at:

Email: info@quokka360.com.

Phone: +410919240108

We will respond to access and correction requests within **20 business days**, as mandated by POPIA.

9) Regulatory Authority

Information Regulator (South Africa)

JD House, 27 Stiemens Street, Braamfontein, Johannesburg, 2001

<https://www.justice.gov.za/infoereg/>

infoereg@justice.gov.za

+27 (0)10 023 5207

10) Updates to this Notice

We reserve the right to amend this privacy notice at any time. If significant changes are made, we will notify you via our website, email, or

other appropriate means.

VENEZUELA Aviso de Privacidad - Clientes residentes en Venezuela

Última actualización: 21.07.25. Este Aviso de Privacidad describe de forma clara y transparente cómo [Nombre de la empresa] recopila, utiliza, conserva, comunica y protege los datos personales de los clientes ubicados en Venezuela, en cumplimiento con la Constitución de la República Bolivariana de Venezuela (Artículo 28), la Ley de Infogobierno (2013) y los principios internacionales de protección de datos.

1) Responsable del tratamiento [Nombre de la empresa]

Quokka Sagl, Piazza Santa Lucia, 7 6900 Massagno

Correo electrónico de contacto: info@quokka360.com.

Teléfono de atención: +410919240108

El responsable del tratamiento garantiza que los datos personales serán tratados conforme a los principios de licitud, transparencia, finalidad legítima, proporcionalidad y confidencialidad.

2) Datos personales recopilados

Podemos recopilar las siguientes categorías de datos personales:

- Datos identificativos: nombre, apellido, cédula de identidad o pasaporte, RIF
- Datos de contacto: dirección, correo electrónico, número de teléfono
- Datos comerciales: historial de compras, solicitudes, quejas o reclamos
- Datos financieros: información bancaria o de medios de pago electrónicos
- Datos técnicos: dirección IP, registros de acceso, navegador, sistema operativo
- Datos sensibles (*solo cuando sea necesario y con consentimiento expreso*): salud, biometría, origen étnico, creencias, entre otros

3) Finalidades del tratamiento

Sus datos serán utilizados para las siguientes finalidades:

Finalidad	Base legal del tratamiento
Provisión de productos y servicios solicitados	Ejecución de una relación contractual
Gestión administrativa, contable y fiscal	Cumplimiento de obligaciones legales
Comunicación operativa y atención al cliente	Interés legítimo de la empresa
Envío de promociones o comunicaciones publicitarias	Consentimiento expreso del titular
Prevención de fraudes y seguridad de los sistemas	Interés legítimo / obligación legal
Conservación de registros para fines legales o regulatorios	Cumplimiento de normativas locales e internacionales

4) Plazo de conservación

Los datos personales se conservarán por el tiempo estrictamente necesario:

Tipo de datos	Plazo estimado de conservación
Información contractual y fiscal	5 a 10 años, según lo establecido en leyes civiles/fiscales
Datos de marketing	Hasta que se revoque el consentimiento
Información sobre reclamos	Hasta su resolución y durante el período de prescripción
Registros técnicos (logs)	Hasta 12 meses (o más si hay justificación legal)

5) Seguridad de los datos

Aplicamos medidas técnicas y organizativas para proteger sus datos personales:

- Control de acceso y autenticación segura
- Cifrado de datos sensibles en tránsito y almacenamiento
- Sistemas actualizados de firewall y antivirus
- Copias de seguridad y recuperación ante desastres
- Capacitación regular del personal sobre protección de datos

6) Transferencia internacional de datos

En caso de que sus datos personales se transfieran fuera del territorio venezolano:

- Se hará únicamente a países que cuenten con niveles adecuados de protección
- Se usarán cláusulas contractuales, acuerdos o medidas similares
- En caso necesario, se solicitará su consentimiento explícito y previo

7) Derechos del titular de los datos

Usted como titular de los datos personales tiene derecho a:

Derecho	Descripción
Acceso	Solicitar copia y confirmación sobre el tratamiento de sus datos
Rectificación	Corregir datos incorrectos o incompletos
Supresión	Solicitar la eliminación de datos en casos permitidos
Oposición	Oponerse al tratamiento por razones legítimas
Revocación del consentimiento	Retirar su consentimiento en cualquier momento
Limitación del tratamiento	Solicitar la suspensión temporal del tratamiento
Portabilidad (<i>si aplica</i>)	Obtener sus datos en formato estructurado
Presentar reclamos	Ante el responsable del tratamiento o autoridades competentes

8) Cómo ejercer sus derechos

Puede ejercer sus derechos contactándonos a través de:

Email: info@quokka360.com.

Phone: +410919240108

Responderemos a su solicitud en un plazo razonable, conforme a los principios de la buena administración y la normativa venezolana.

9) Autoridades competentes

Actualmente, Venezuela no cuenta con una autoridad nacional especializada en protección de datos. No obstante, puede acudir a:

- Tribunales venezolanos, para ejercer acciones legales
- Defensoría del Pueblo, en caso de violaciones a derechos constitucionales
- Ministerio del Poder Popular para Ciencia y Tecnología, para aspectos relacionados con sistemas de información

10) Cambios en esta política

Nos reservamos el derecho de modificar esta política de privacidad en cualquier momento. Le notificaremos los cambios mediante nuestro sitio web o canales oficiales adecuados.

URUGUAY Aviso de Privacidad - Clientes residentes en Uruguay. Última actualización: 21.07.25. Este Aviso de Privacidad explica cómo [Nombre de la empresa] recolecta, utiliza, conserva, protege y comparte los datos personales de los clientes residentes en Uruguay, en cumplimiento con la Ley N.º 18.331 sobre Protección de Datos Personales y Acción de Habeas Data, su decreto reglamentario N.º 414/009, y en concordancia con los principios internacionales de legalidad, transparencia, minimización y responsabilidad proactiva.

1) Responsable del tratamiento

Quokka Sagl, Piazza Santa Lucia, 7 6900 Massagno

Correo electrónico de contacto: info@quokka360.com.

Teléfono de atención: +410919240108

2) Datos personales que recopilamos

Podemos tratar las siguientes categorías de datos personales:

- Datos identificativos: nombre completo, cédula de identidad, RUT u otros documentos oficiales
- Datos de contacto: domicilio, correo electrónico, número de teléfono
- Datos contractuales o comerciales: historial de compras, solicitudes, reclamos
- Datos financieros o de pago: información bancaria o métodos electrónicos
- Datos técnicos: dirección IP, registros de actividad, cookies
- Datos sensibles: solo serán tratados en casos justificados y con consentimiento expreso y escrito, conforme al artículo 18 de la Ley 18.331

3) Finalidades del tratamiento

Finalidad del tratamiento	Base legal
Prestación de servicios o productos contratados	Ejecución de una relación contractual
Cumplimiento de obligaciones fiscales, contables y legales	Obligación legal
Atención al cliente y comunicación operativa	Interés legítimo
Envío de promociones y comunicaciones publicitarias	Consentimiento informado y previo
Gestión de reclamos y resolución de disputas	Interés legítimo / obligación legal
Estadísticas y mejoras de procesos (datos anonimizados)	Interés legítimo
Tratamiento de datos sensibles	Consentimiento expreso por escrito

4) Plazo de conservación de los datos

Tipo de datos	Plazo de conservación estimado
Datos fiscales y contables	5 años, conforme normativa tributaria
Datos para fines de marketing	Hasta que se revoque el consentimiento
Datos técnicos (logs, registros)	Hasta 12 meses, salvo requerimientos legales específicos
Datos vinculados a controversias	Durante el tiempo que dure el proceso y el plazo legal de prescripción

5) Medidas de seguridad aplicadas

Adoptamos medidas técnicas y organizativas para garantizar la integridad, confidencialidad y disponibilidad de los datos:

- Cifrado de datos sensibles
- Sistemas de detección de intrusos y antivirus
- Acceso restringido solo a personal autorizado
- Backups regulares y seguros
- Protocolos de seguridad en redes y plataformas digitales

6) Transferencia internacional de datos

Podremos transferir datos personales fuera del territorio nacional únicamente cuando:

- El país de destino haya sido declarado adecuado por la URCDP,
- Existan cláusulas contractuales que garanticen un nivel de protección equivalente
- O bien contemos con su consentimiento expreso e informado

7) Derechos de las personas titulares de los datos

Usted, como titular de los datos personales, tiene los siguientes derechos conforme a la Ley 18.331:

Derecho	Descripción
Acceso	Obtener información sobre sus datos y el tratamiento realizado
Rectificación	Corregir datos inexactos o incompletos
Supresión	Solicitar la eliminación de datos en los casos permitidos por ley
Oposición	Oponerse al tratamiento por motivos fundados y legítimos
Portabilidad	Recibir sus datos en un formato estructurado y de uso común
Revocación del consentimiento	Retirar su consentimiento en cualquier momento
Reclamo ante la URCDP	En caso de vulneración de derechos

8) Ejercicio de derechos

Para ejercer cualquiera de los derechos antes mencionados, contáctenos a través de:

Correo electrónico: Email: info@quokka360.com.

Teléfono: +410919240108

Respondemos las solicitudes en un **plazo máximo de 5 días hábiles**, conforme a la legislación nacional.

9) Autoridad de control en Uruguay

La autoridad responsable del cumplimiento y supervisión en materia de datos personales es:

Unidad Reguladora y de Control de Datos Personales (URCDP)

Dirección: Montevideo, Uruguay

Sitio web: <https://www.datospersonales.gub.uy>

Correo: contacto@urcdp.gub.uy

10) Cambios en esta política

Este Aviso de Privacidad puede ser actualizado ocasionalmente. En caso de cambios sustanciales, se lo notificaremos a través de nuestros canales oficiales, incluidos el sitio web y/o correo electrónico.

