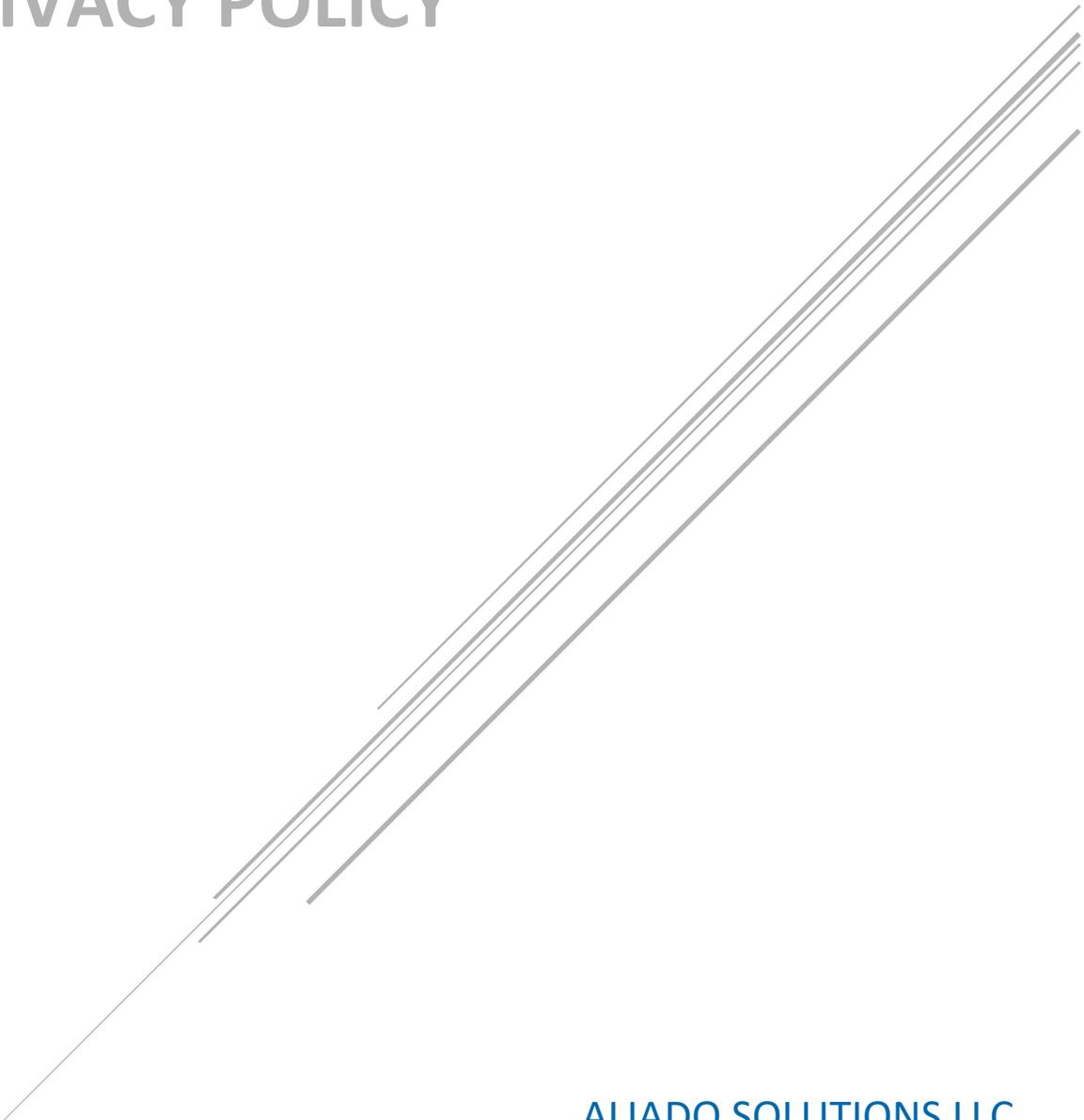




# PRIVACY POLICY



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## Aliado Privacy Policy

# 1. Privacy Policy

This Privacy Policy describes Aliado Solution’s policies and procedures on the collection, processing and disclosure of Client/Customer’s information.

We use Client/Customer’s Personal Identifiable Information (PII), or any data that the Client/Customer may store, to provide and improve the Service provided by Aliado Solutions as a data processor in the engagement (s). By using the Service, the Client/Customer agree to any potential processing of such information in accordance with this Privacy Policy.

# 2. Interpretation and Definitions

## Interpretation

The words of which the initial letter is capitalized have meanings defined under the following conditions. The following definitions shall have the same meaning regardless of whether they appear in singular or in plural.

## Definitions

For the purposes of this Privacy Policy:

- A “Data subject” is a reference to any individual who may be a customer, client, prospective customer or client, or anyone who works part-time or full-time for Aliado Solutions, under a contract of employment, whether oral or written, express or implied, and has recognized rights and duties. This includes past employees, temporary employees and independent contractors. This also includes anyone who can be identified, directly or indirectly, by reference to an identifier defined under “Personal Data” in the ‘Definitions’ section of this policy.
- “Personal data” is defined as any information (including opinions and intentions) relating to an identified or identifiable natural person. It can reference, but is not limited to, the following identifiers: a name, an identification number, location data, an online identifier or one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.
- “Processing” of personal data may include “collection, recording, organization, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission,

dissemination or otherwise making available, alignment or combination, restriction, processing while troubleshooting and resolving and any may be by automated or manual means.”

- A “Client” is a reference to past, current or prospective Aliado Solutions’ clients.
- A “Customer” is a reference to past, current or prospective Aliado Solutions’ customers.
- A “Supplier”, is a third party, vendor, sub processor company, contractor or organization that is either a data processor or data controller and in a business relationship with Aliado Solutions.
- “Data controller” - A company is a data controller when it has the responsibility of deciding why and how (the “purposes” and “means”) the personal data is processed.
- “Data processor” - A company is a data processor when it processes personal data on behalf of a data controller. Under the GDPR, data processors have obligations to process data safely and legally.

## 3. Scope

This policy is defined by Aliado Solutions being a Data Processor on behalf of the Data Controller as defined in General Data Protection Regulation (2016/679) and applies to all internal employees, third-party suppliers and sub processors.

Aliado Solutions employees are trained and required to be compliant. Third party sub processors are audited to ensure their systems form the basis of compliance with this policy.

This policy remains current until it is reviewed or reissued. When this occurs, all affected personnel will be made aware before the new policy is adopted.

## 4. Policy & Procedures

### 4.1. Policy Information

Aliado Solutions, will have a clear and specific agreement with the Data Controller to ensure that no personal data is kept, but only encountered upon while troubleshooting or performing services as part of the scope of the engagement (s).

Aliado Solutions agree to:

- Comply with the requirements of the Services Agreement in the provision of services to the Data Controller;

- Process and use the Data only to the extent strictly necessary to perform its obligations or as otherwise provided under the Services Agreement;
- Only disclose the Data to the Data Processor's employees and personnel that have a need to access the Data for the Data Processor's compliance, while the Data Processor shall ensure that all such employees and personnel are bound by a confidentiality agreement;
- Take all reasonable steps to ensure the reliability of all its employees and personnel who have access to the Data;
- Ensure that appropriate controls are in place to prevent the Data Processor's access to special categories of Data, where relevant, except in circumstances expressly authorized by the Data Controller;
- Implement, maintain and at all times operate adequate and appropriate technical and organizational measures to;
  - I. protect the security, confidentiality, integrity and availability of the Data, and
  - II. protect against unauthorized or unlawful processing of the Data and against accidental loss, destruction or the making vulnerable of, or damage to, the Data; such measures shall, at a minimum, meet
    - a) the requirements of Data Protection Law;
    - b) the standards required by all applicable accepted industry practices;
- Comply with its obligations under Data Protection Law, and shall take such steps as are requested by Data Controller to enable the Data Controller to comply with the Data Controller's obligations under Data Protection Law;
- Provide evidence to the Data Controller on request of the technical and organizational measures the Data Processor has taken to comply with its obligations.

## 4.2. Data Transfer

Aliado Solutions will not transfer, access or process any personal data without the express prior written consent of the Data Controller.

## 4.3. Sub processors

Aliado Solutions will not subcontract personal data processing without the written permission of the Data Controller.

If written permission is provided, then Aliado Solutions will ensure that all third parties engaged to store or process personal data on Aliado Solutions' behalf (i.e., Data sub processors) are aware of and comply with the contents of this policy and the GDPR (2016/679) regulation. Assurance of such compliance is obtained from all sub processors, whether companies or individuals, prior to granting them access to Personal Data controlled by Aliado Solutions.

## 4.4. Breach or Compliance Failure

If Aliado Solutions discovers or suspects a compliance failure, security incident, suspected incident or breach, then it will:

- Implement immediate containment of the breach;
- Accurately record the details of the incident;
- Provide an initial assessment of the incident to the Data Controller within 24 hours;
- Provide support to the Data Controller to establish the details surrounding the breach.

## 4.5. Returning Data

Upon the request of the Data Controller or on Termination of the Agreement of Services, Aliado Solutions will return or securely destroy any personal data relevant to the Data Controller.

## 4.6. Privacy by Design and Default

Aliado Solutions encompasses privacy by design as an approach to projects and applications.

## 4.7. Criminal Record Checks

Where criminal record checks are required and justified by law, they are carried out. Criminal record checks are not undertaken based solely on the consent of the data subject.

## 4.8. Data Portability

Upon request, a data subject has the right to receive a copy of their data in a structured format. Where relevant, and where there is no undue burden and it does not compromise the privacy of other individuals, Aliado Solutions will assist the Data Controller in transferring the data directly to another system.

## 4.9. Right to be Forgotten

With a formal written request from the Data Controller to the Aliado Solutions Data Protection Officer, Aliado Solutions will assist the Data Controller, where relevant, in deleting or removing any personal data requested.

## 4.10. Monitoring

The Aliado Solutions Data Protection Officer has overall responsibility for this Policy and will monitor it regularly to make sure it is being adhered to.

## 5. FURTHER INFORMATION

For Further information, please contact Aliado Solutions LLC, 3948 Legacy Drive, Suite 106 Plano, TX 75023-8300.

- By email: [info@aliadosolutions.com](mailto:info@aliadosolutions.com)
- By visiting this page on our website: <https://aliadosolutions.com/>