

Last changed: 5/20/2018

Welcome to the Pueblo Checo Privacy Policy

This Privacy Policy is meant to help you understand what data we collect, why we collect it, and what we do with it.

Privacy Policy

As you use our services, we want you to be clear how we're using information and the ways in which you can protect your privacy.

Our Privacy Policy explains:

1. What information we collect and why we collect it.
2. How we use that information.
3. The choices we offer, including how to access and update information.

Information we collect

We collect information which is necessary to establish legal contract between Pueblo Checo and the customer. Furthermore we might need contact information to notify you about events related to contract.

We collect information in the following ways:

1. Information you give us. For example, our service require you to sign up for an account. When you do, we'll ask for personal information, like your name, email address, telephone number to store with your account.
2. Information we get from your use of our services. We collect information about the services that you use and how you use them, like browsing projects, logging to your account. This information includes:

- a. Device information
- b. Log information
 - 1. We automatically collect and store certain information in server logs. This includes:
 - a. Internet protocol address.
 - b. device event information such as crashes, system activity, hardware settings, browser type, browser language, the date and time of your request and referral URL.
 - c. cookies that may uniquely identify your browser or your account.
- c. Local storage
 - 1. We may collect and store information (including personal information) locally on your device using mechanisms such as browser web storage (including HTML 5) and application data caches.
- d. Cookies and similar technologies

How we use information we collect

We use the information we collect from all of our services to provide, maintain, protect and improve them, to develop new ones.

When you contact Pueblo Checo, we keep a record of your communication to help solve any issues you might be facing. We may use your email address to inform you about our services, such as letting you know about upcoming changes or improvements.

We use information collected from cookies and other technologies to improve your user experience and the overall quality of our services. For example, by saving your language preferences, we'll be able to have our services appear in the language you prefer.

We will ask for your consent before using information for a purpose other than those that are set out in this Privacy Policy.

Pueblo Checo processes personal information on our servers in many countries around

the world. We may process your personal information on a server located outside the country where you live.

Accessing and updating your personal information

Whenever you use our services, we aim to provide you with access to your personal information. If that information is wrong, we strive to give you ways to update it quickly or to delete it – unless we have to keep that information for legitimate business or legal purposes.

We aim to maintain our services in a manner that protects information from accidental or malicious destruction. Because of this, after you delete information from our services, we may not immediately delete residual copies from our active servers and may not remove information from our backup systems.

Information we share

We do not share personal information with companies, organizations and individuals outside of Pueblo Checo unless we have to:

1. meet any applicable law, regulation, legal process or enforceable governmental request.
2. enforce applicable terms of contract, including investigation of potential violations.
3. detect, prevent, or otherwise address fraud, security or technical issues.
4. protect against harm to the rights, property or safety of Pueblo Checo, our users or the public as required or permitted by law.

European requirements

If European Union (EU) data protection law applies to the processing of your information, we provide the controls described in this policy so you can exercise your right to request access to, update, remove, and restrict the processing of your information.

With your consent

We ask for your agreement to process your information for specific purposes and you have the right to

withdraw your consent at any time. You can manage these settings in your portal account.

Information security

We work hard to protect Pueblo Checo and our clients from unauthorized access to or unauthorized alteration, disclosure or destruction of information we hold. In particular:

1. We encrypt many our service using SSL.
2. We review our information collection, storage and processing practices, including physical security measures, to guard against unauthorized access to systems.
3. We restrict access to personal information to Pueblo Checo employees, contractors and agents who need to know that information, and who are subject to strict contractual confidentiality obligations and may be disciplined or terminated if they fail to meet these obligations.

Security Standards

Confidentiality

We guarantee confidentiality of your account.

When it comes to staff and third parties, anyone who can view Customer data is contractually obligated to keep them confidential.

Infrastructure

Pueblo Checo portal is hosted on Microsoft Azure infrastructure. Currently, our servers are located in Netherlands. We might expand our servers to different regions within Microsoft Azure infrastructure in the future, but in such case, we would adequately notify you about the change with an option to keep your data within the region you prefer.

The Microsoft Azure environment that hosts the Pueblo Checo maintains multiple certifications for its data centres. For more information about their certification and compliance, please visit the Microsoft Azure website (<https://docs.microsoft.com/en-us/azure/security/>).

When it comes to the architecture, we use multiple tiers within our stack. Each service is limited to operate only within a specific tier, and each tier provides services exclusively for function intended for that tier.

1. Data Encryption

Pueblo Checo portal supports the latest recommended secure cipher suites and protocols to encrypt (SHA-256 with RSA Encryption) all traffic in transit. Customer data is encrypted at rest as well, our infrastructure is accessible only by the operations team and through VPN in combination with internal SSO solution. All activity is logged and audited.

2. Availability and Disaster Recovery

Approximate availability of the Pueblo Checo portal is at 99.95%. Our infrastructure runs on systems that are fault tolerant of failures of individual servers.

3. Monitoring and Logging

Our solution is monitored on several levels. We use infrastructure as well as application monitoring tools. In combination with specialized tools for analysis and data visualization, it gives us strong insights about the condition our services are in. Pueblo Checo portal maintains an extensive, centralized logging environment in its production environment which contains information pertaining to security, monitoring, availability, access, and other metrics about the Pueblo Checo.

Third Party Service Providers

SUBPROCESSOR	PURPOSE	DATA	COUNTRY OF PROCESSING
Microsoft Azure	Infrastructure as a service	All customer data (personal information, contact, technical)	Netherlands
WEDOS Internet, a.s.	Emails, Web presentation		Czech Republic

Compliance and cooperation with regulatory authorities

We regularly review our compliance with our Privacy Policy. When we receive formal written complaints, we will contact the person who made the complaint to follow up.

GDPR Adoption

The GDPR's updated requirements are significant and our team is working hard to bring commitments in line.

Measures to achieve this include:

- **Changes in our portal itself.** We are changing our user interfaces and service offerings in order to give all users more visibility, transparency and control over the data they submit to and who has permission to view it or edit it.
- **Investments under the hood.** We are working on improvements to our infrastructure, to fulfil all the requirements and obligations connected to continuous security monitoring, data breaches and security incident management.

Changes

Our Privacy Policy may change from time to time. We will not reduce your rights under this Privacy Policy without your explicit consent. We will post any privacy policy changes on this page and, if the changes are significant, we will provide a more prominent notice (including, for certain services, email notification of privacy policy changes). We will also keep prior versions of this Privacy Policy in an archive for your review.

Where to contact us

If you have any questions about or suggestions for improving this Privacy Policy, please contact us at info@pueblocheco.com or by mail at:

Jardin Deportivo 1, Cabarete, Puerto Plata, Dominican Republic