Privacy Policy

How YOY TRAINING SPA collects, uses, retains and protects the personal data processed through its platforms, in accordance with Chilean Law No. 21.719 on the Protection of Personal Data.

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1.3

This document does not constitute or replace legal advice; it describes the actual processing of personal data carried out by Yoy Simulators. It complements the Terms and Conditions of Use, which together with this Policy form a single contractual body.

01. Identification, scope and roles

YOY TRAINING SPA, Chilean tax ID (RUT) **76.277.334-1**, with registered address at Calle Arlegui N°440, office 912, Viña del Mar, Chile ("Yoy"), processes the personal data described in this Policy as data controller or as data processor, as explained in this section. For any query regarding this Policy, or to exercise your rights, you can contact us at **soporte@yoy.cl**.

Scope: this Policy applies to the processing of personal data carried out through:

- the `accounts.yoy.cl` platform (Yoy Account and Yoy Accounts App);
- the Yoy simulators that synchronise with it, and Yoy's virtual tours;
- the corporate website `yoysimulators.com`, including its contact form.

Yoy's purely informational sites, such as `docs.yoy.cl`, use no forms, user accounts or first-party cookies; only our network provider processes technical connection data (IP address) for security purposes.

Roles in the processing of personal data

Where the Organization determines the purposes and means of processing its Users' data in order to manage their training and assessment, it acts as the **controller**. Yoy acts as **processor** with respect to the operations it performs on that data on the Organization's behalf — including enrolments, activity and assessment results — following the Organization's instructions and the applicable contract.

Yoy acts as **controller** with respect to processing whose purposes and means it determines on its own account, such as managing its commercial relationship, invoicing and complying with its legal obligations.

In account administration, support and security, Yoy's role depends on the purpose of each operation and on whether it is carried out on the Organization's behalf or for Yoy's own purposes. This allocation does not release either party from its legal obligations.

02. Categories of personal data we process

- **Identification data:** first name, last name, email address, phone number, country.
- **Enhanced identification data:** national ID number (RUT) or identity document, where the Organization registers or "enrols" a User.
- **Organization and role data:** the Organization the User belongs to, and the role assigned (administrator, sales, instructor, assistant, student, guest).
- **Device data:** serial number and/or unique identifier (GUID) of the device used, which may be a virtual reality headset or a computer (PC).
- **Usage and telemetry data:** session duration, start/end dates and times, lesson or course used, licence consumed.
- **Technical connection data:** IP address, and the approximate location derived from it.
- **Assessments and results:** scores, answers and assessment results generated while using the simulator.
- **Simulation events:** a continuous record of what happens during each simulator session (for example, accidents, interactions and object handling), with their parameters and timestamp, associated with the device and the experience used.
- **Commercial contact data:** whatever you voluntarily enter into the contact form on `yoysimulators.com` (for example, name, email, company and message).
- **Support data:** technical logs from customer devices and, where they are included in support communications, names and email addresses.

Mandatory data: name, email address and, where the Organization requires it, the national ID number or identity document, are necessary to create the account and to associate assessment results with the right person; without them the service cannot be provided. Other contact details (for example, the phone number) are optional.

> **Express statement**
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> Yoy does not collect sensitive data (ethnic origin, political affiliation, religious beliefs, health, biometric data for unique identification, sex life or sexual orientation/gender identity) through these platforms. Should biometric sensors be incorporated in the future for identification purposes, this Policy will be updated before they are implemented.

03. Why we process your data, and on what legal basis

Purposes: to create and administer your account and your Organization's account; to assign and control the use of licences and devices; to invoice hours consumed; to provide technical support; to prevent fraud and keep the platform secure; to generate usage reports for your Organization; to respond to requests for commercial information received through our website; and to improve our products, using aggregated or anonymised data rather than individual profiles. **We do not use your data for automated profiling or third-party advertising.**

- **Performance of a contract:** for most operational data (identification, role, use of licences and devices).
- **Compliance with legal obligations:** for example, data required for tax or invoicing purposes.
- **Consent:** for optional commercial communications, which you can unsubscribe from at any time by writing to **soporte@yoy.cl**.
- **Legitimate interest:** for security and activity logging.

Withdrawal of consent: where processing is based on your consent, you may withdraw it at any time, without affecting the lawfulness of processing carried out before the withdrawal.

Your data may be collected directly from you, or provided by the Organization you belong to (for example, when a school or company registers its Users on the platform).

04. Minors

Where the Organization is an educational institution or another entity that registers Users under 18 years of age (for example, in the "student" role):

- For children under 14, processing their data requires verifiable consent from their parents or legal guardians. That consent must be obtained and retained by the Organization, which acts as intermediary before Yoy in accordance with the Terms and Conditions.
- For adolescents between 14 and 17, a reinforced standard of information and processing applies, giving priority to the best interests of the minor.
- Yoy does not collect parental consent directly; obtaining and safeguarding it is the educational Organization's contractual responsibility.

> **Outside an educational context**
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> If you are not an educational institution and you register a minor as a User by mistake, you must inform us immediately at **soporte@yoy.cl** so that the appropriate measures can be taken, including the possible deletion of that data.

05. Retention, recipients and international transfers

Retention period: we retain your personal data for the duration of the contractual relationship with your Organization, and for up to **5 additional years** after it ends — a period aligned with common practice for retaining training records in industrial and operational safety environments, where proof of training received may be required years later. Historical usage and telemetry data is retained for the same auditing and invoicing purpose. This period does not apply if you exercise your right to erasure under section 06, or if the law requires a different one.

Recipients and data processors

Provider	Purpose	Location / transfer
Oracle Cloud Infrastructure	Data storage and processing	Santiago, Chile (no international transfer)
Cloudflare	DNS, firewall, delivery and DDoS protection for all traffic to the platforms (processes IP addresses and technical connection data)	International
Laravel Forge	Server administration and deployment (technical access to the infrastructure where the data is hosted)	International
Google Workspace	Institutional and transactional email	International — subject to the Google Data Processing Terms and its standard contractual clauses
HubSpot	`yoysimulators.com` contact form and management of commercial enquiries	International
Google OAuth	Optional sign-in with a Google account	International — only if the User chooses to use it
Google reCAPTCHA	Fraud/spam prevention	International
Gravatar (Automattic)	Profile avatar (a hash of the email address is sent, not the address in plain text)	International
Slack	Technical support coordination: exchange of technical logs from customer devices and, where included in the communications, names and email addresses	International
The customer Organization's LMS	When the User accesses a simulator integrated with their own Organization's learning management system, that LMS receives assessment and activity data	Depends on the Organization

These providers process data on Yoy's behalf, under their data processing terms and confidentiality and security obligations. This table is updated whenever a provider is added or replaced.

We do not sell or share your personal data with third parties for advertising purposes. We will only disclose it to an authority where there is a legal obligation or a judicial order.

International transfers

Our primary storage infrastructure is located in Chile. The providers listed above that involve transferring data outside Chile operate under standard contractual clauses or other equivalent safeguards required by Law No. 21.719.

Third-party platforms and websites

Meta Quest headsets, their operating system and their app store are operated by Meta under its own privacy policies; the Meta account associated with the headset is not managed by Yoy. Likewise, third-party sites linked from our platforms are governed by their own policies, over which Yoy has no control.

06. Your rights (ARCO+)

You have the right to **Access** your data, **Rectify** inaccurate data, request **Erasure** of your data where applicable, **Object** to certain processing, request the **Portability** of your data, and request the temporary **Blocking** of its processing. These rights are personal, non-transferable and cannot be waived.

To exercise them, contact us at **security@yoy.cl** or **soporte@yoy.cl**. Exercising these rights is free of charge; we may ask you for reasonable evidence to verify your identity before responding. We will respond within the maximum period of 30 days established by law. Until an automated mechanism exists, portability and the deletion/anonymisation of data are handled manually through this same channel.

If your request concerns data administered by the Organization you belong to, we will forward it to that Organization and let you know we have done so. You may also withdraw previously given consent at any time (section 03).

> **Complaints to the supervisory authority**
> If you believe that the processing of your data does not comply with applicable regulations, you may file a complaint with Chile's Personal Data Protection Agency. Its official channels will be published in this Policy once the Agency is operational.

07. Security, automated decisions and cookies

- **Security measures:** role-based access control, encryption in transit, continuous monitoring and scanning of the infrastructure, and periodic security assessments — regular internal reviews plus an external assessment (penetration test) on an annual cadence, the next of which is being procured. These measures are reviewed and updated as risks evolve. Full detail in the Security — Methodologies, Technologies and Communication document.
- **Breach notification:** in the event of a security breach affecting personal data, we will notify the Personal Data Protection Agency within a maximum of 72 hours of becoming aware of it, and affected data subjects without undue delay where there is a high risk to their rights.
- **Cookies and local storage:** we use local storage and caching in your browser or device for our services to work, including the session token and your language and display preferences. In the virtual tours, assets and media files are also stored in order to load and play the content. Our network provider may set a technical security cookie to distinguish legitimate traffic from automated traffic. We do not use advertising cookies or behavioural analytics tools; if this changes, this Policy will be updated before they are used.
- **Automated decisions:** we do not carry out automated profiling, nor do we make decisions that significantly affect you based solely on automated processing of your data.

08. Users outside Chile

Yoy provides services to Organizations in various countries. Where the data protection legislation of the User's country applies — for example, the European Union's General Data Protection Regulation (GDPR) or other equivalent local laws — Yoy recognises the rights granted by that legislation, which may be exercised through the same channels indicated in section 06.

09. Privacy contact and changes to this Policy

For queries related to the processing of your personal data, contact us at **security@yoy.cl** or **soporte@yoy.cl**. Yoy does not currently have a formal Data Protection Officer (DPO); this contact acts as the operational privacy owner.

We may update this Policy from time to time. The date of the current version is shown at the beginning of this document; substantial changes will be communicated through the platform or by email. Earlier versions remain available at the Yoy Trust Center.