



DOCUMENTO LEGAL

Privacy Policy

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1. Who we are

This Privacy Policy describes how **SUPRAPAY PY E.A.S.**, RUC No. **80166544**, with registered address at **Avenida Curupayty esquina Farid Rahal, No. 917, Ciudad del Este, Alto Paraná, Paraguay** ("the Platform", "we"), processes personal data in the **Supra Pay / Plutus** mobile application and related services, when used by authorized users of client businesses (merchants).

Data controller: SUPRAPAY PY E.A.S. — RUC 80166544 — Avenida Curupayty esquina Farid Rahal, No. 917, Ciudad del Este, Alto Paraná, Paraguay **Privacy contact:** soporte@suprapay.com.py

2. Scope

2.1 Applies to data processed through the mobile application, APIs, push notifications, and integrations required for operation (payments, currency exchange, store/POS management, as enabled).

2.2 The **merchant** may be a joint controller for certain processing related to its own operations; the commercial agreement with the merchant prevails where applicable.

3. Data we may process

Category	Examples	Main purpose
Account & authentication	name, e-mail, user ID, profile/roles	secure access to the app
Device	device identifier, model, OS, FCM token	security, notifications, support
Operational	store, POS, shift, transactions and amounts	delivery of the payment service
Technical	IP, logs, timestamps, app version	security, audit, service improvement
Location	only if the product requests explicit permission	fraud prevention at the point of sale

We do not request data beyond what is necessary for the service.

4. Legal basis

We process personal data based on the right to informational self-determination recognized under Article 135 of the National Constitution of the Republic of Paraguay, Law No. 1682/2001 and its amendment Law No. 1969/2002 on private information, and Law No. 6534/2020 on the Protection of Credit-Related Personal Data, to the extent applicable to payment services activity, as well as applicable Central Bank of Paraguay regulations for electronic payment method entities.

Depending on the case, processing relies on:

- **contract performance** or pre-contractual steps;
- **legitimate interest** (security, fraud prevention), with balancing of rights;
- **compliance with a legal or regulatory obligation**;
- **consent**, where required (e.g. optional notifications) — withdrawable at any time.

Users in Brazil: for users domiciled in Brazil, we additionally recognize the rights set out in the Brazilian General Data Protection Law (Lei No. 13.709/2018 - LGPD), to the extent applicable to their data processing.

5. Sharing

We may share data with:

- **service providers** (hosting, Firebase/Google Cloud, payment processors, support), under contract and security measures;
- **authorities**, when required by law or a valid order;
- the **account merchant**, for the management of its own operations.

We do not sell personal data.

6. International transfers

If we use infrastructure located in other countries, we apply reasonable safeguards (contractual clauses, providers with recognized security certifications) to preserve the level of protection of transferred data.

7. Retention

We retain data for as long as necessary for the purposes described, legal or regulatory obligations, and applicable statute-of-limitations periods. After that, we delete or anonymize the data, subject to legal exceptions.

8. Security

We adopt technical and organizational measures proportionate to risk (access control, encryption in transit, environment segregation, audit logs). No system is 100% secure; please report any suspected incident to the contact channel indicated in Section 12.

9. Your rights

Under the regulations cited in Section 4, you may request: confirmation of processing, access, correction, updating, deletion of unnecessary data or data processed in violation of the law, information on who your data is shared with, and withdrawal of consent previously given.

Contact: soporte@suprapay.com.py — we will respond within applicable legal timeframes.

10. Minors

The application is intended for **authorized** users in a business context; it is not directed at minors under 18 without supervision from the merchant or their legal guardian.

11. Changes

We may update this Policy. The **version** and publication date are available via API (`GET /api/legal-documents/privacy-policy`). Material changes may require renewed acceptance in the application.

12. Contact

Privacy inquiries: soporte@suprapay.com.py Operational support: soporte@suprapay.com.py

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