LEGAL DOCUMENT

International privacy and personal data processing policy

Virtual Assistant OK LLC | Asistente Virtual OK – AVO

LAST UPDATED	JURISDICTION	CONTACT
September 2026	LATAM, United States, and Spain	info@asistentevirtualok.com

01 Introduction

At **Asistente Virtual OK – AVO**, we recognize the importance of protecting the privacy and personal data of our clients, prospects, associates, suppliers, candidates, and other individuals with whom we maintain a relationship.

AVO is an international **Business Process Outsourcing (BPO)** company that provides services to clients located in different countries and has teams and suppliers that may be located in various jurisdictions.

For this reason, personal data may be subject to different data protection laws depending on the country where the data subject is located, the place where the processing takes place, and the nature of the relationship with AVO.

This Policy sets out the general principles under which AVO collects, uses, stores, protects, transmits and, where applicable, transfers personal data.

02 Data controller

Legal name: Virtual Assistant OK LLC
Trade name: Asistente Virtual OK – AVO
Jurisdiction: LATAM, United States, and Spain
Website: www.AsistenteVirtualOk.com
Contact email: info@asistentevirtualok.com

For the purposes of this Policy, the company will be referred to as **"AVO"**.

When AVO acts as a **Data Processor** of data provided by a client, that client may be the Data Controller and determine the purposes and conditions under which such data is used.

03 Information we may collect

Depending on the relationship with each individual, AVO may collect and process information such as:

- First and last names.
- Contact information, including telephone number, email address, and physical address.
- Professional and employment information.
- Commercial and contractual information.

- Information required for selection and onboarding processes.
- Information related to the provision of our services.
- Billing and payment information.
- Information provided through calls, emails, forms, WhatsApp, or other communication channels.
- Technical information required for the security and operation of our systems and platforms.

AVO will endeavor to collect only the information that is necessary and relevant for the corresponding purposes.

04 Purposes of processing

Personal data may be processed, as applicable, to:

- Manage business relationships with clients and prospects.
- Present and offer AVO's services.
- Execute and administer contracts and services.
- Provide virtual assistance, teleoperation, administrative support, and sales support services.
- Manage communications with clients and users.
- Administer selection, hiring, and management processes for associates and suppliers.
- Manage billing, payments, and administrative processes.
- Respond to requests, inquiries, complaints, and claims.
- Carry out quality control and service monitoring.
- Maintain the security of our operations and systems.
- Improve our services and processes.
- Comply with legal, contractual, and regulatory obligations.
- Fulfill other purposes disclosed to the data subject and permitted by applicable law.

When AVO processes personal data on behalf of a client, the purposes will be determined by that client and by the terms of the contracted service.

05 AVO as data controller or data processor

Depending on the nature of the relationship, AVO may act as **Data Controller or Data Processor**.

AVO acts as **Controller** when it determines the purposes and means of processing personal data, for example, with respect to its own clients, prospects, suppliers, candidates, and associates.

AVO acts as **Processor** when it processes personal information on behalf of a client as part of providing a BPO service.

In these cases, AVO will process the information in accordance with the client's instructions, the corresponding contract, and applicable law.

Associates, contractors, and other persons authorized by AVO may only access and use the information necessary to perform the duties assigned to them.

06 Legal bases and authorization

AVO will process personal data in accordance with the legal basis applicable in each jurisdiction.

Where consent is required, it will be requested in advance, in an informed manner and, where applicable, expressly.

The data subject may withdraw their consent where permitted by applicable law, without prejudice to circumstances that may allow AVO to continue processing certain information due to another legal basis or a retention obligation.

07 International transfers and processing

Due to the international nature of our operations, personal data may be stored, processed, or transmitted in countries other than the data subject's country of residence.

AVO may use technology providers, cloud services, communication platforms, management systems, and other suppliers located in different jurisdictions.

AVO will adopt reasonable contractual, technical, and organizational measures to protect personal data and will endeavor to ensure that third parties with access to it maintain adequate levels of security and confidentiality.

Where applicable law sets specific requirements for international transfers, AVO will endeavor to comply with the mechanisms required by that law.

08 Security and confidentiality

AVO implements reasonable technical, administrative, and organizational measures designed to protect personal data against loss, unauthorized access, misuse, alteration, disclosure, or destruction.

Access to information will be limited to those who need it to perform their duties.

Persons authorized to process personal information will be subject to confidentiality obligations.

09 Rights of data subjects

Depending on applicable law, data subjects may exercise rights such as:

- Knowing the personal data we hold about them.
- Requesting the updating or correction of information.
- Requesting information about the processing carried out.
- Requesting the deletion of their data where legally appropriate.
- Withdrawing consent where applicable.
- Objecting to certain processing where permitted by applicable law.
- Submitting inquiries, requests, or complaints related to the processing of their data.

AVO will address these rights in accordance with the law applicable to each case.

10 Privacy-related requests

Requests related to the processing of personal data may be sent to:

> **info@asistentevirtualok.com**

The request must allow the data subject to be identified and must clearly specify what is being requested.

AVO will respond to requests within the time limits established by applicable law.

When AVO acts as Data Processor, it may forward the request to the client acting as Data Controller where appropriate.

11 Data retention

AVO will retain personal data for as long as necessary to fulfill the purposes for which it was collected, meet legal or contractual obligations, resolve potential disputes, and exercise or defend rights.

Once those purposes and obligations have been fulfilled, the information may be deleted, anonymized, or retained where a legal obligation or basis permits or requires it.

12 Cookies and similar technologies

Our website and certain digital services may use cookies and similar technologies to improve the user experience, maintain security, obtain statistics, and understand how our services are used.

Where applicable, users may manage their cookie preferences through the mechanisms available on the website.

13 Updates to this policy

AVO may update this Policy when necessary due to legal, regulatory, technological, or operational changes, or changes in our services.

The current version will be permanently available at:

> **www.AsistenteVirtualOk.com**

14 Contact

For inquiries related to this Policy or to the processing of personal data, you may contact:

> **Virtual Assistant OK LLC**
> **Asistente Virtual OK – AVO**
> **Jurisdiction:** LATAM, United States, and Spain
> **Email:** info@asistentevirtualok.com
> **Website:** www.AsistenteVirtualOk.com

Last updated: September 2026. The current version of this Policy is available at www.AsistenteVirtualOk.com.