

## PRIVACY POLICIES WEBSITE ADDIIVA ENTERPRISES

The Privacy Policy of ADDIIVA ENTERPRISES and its affiliates (Privacy Policy) describes the personal information that ADDIIVA ENTERPRISES collects from users of the websites, mobile applications (Apps), widgets, and other online and offline services operated by ADDIIVA ENTERPRISES (collectively, the Services), and how we use and protect such **information personal**. This Privacy Policy: Our commitment to your privacy.

When we refer to **personal information**, we mean information that identifies or can be used to identify a person. This means that personal information includes both direct identifiers (such as name) and indirect identifiers (such as computer or mobile device ID and IP address) **you** either **user** By "user," we mean anyone who uses or browses the website data controller We are referring to the **person or entity** that determines what personal information is collected from or about you and how that personal information is used and protected.

At ADDIIVA ENTERPRISES, we understand that everyone we interact with daily has the right to privacy and the protection of their personal data. Therefore, we are committed to establishing and maintaining controls, measures, and procedures that allow us to protect the personal data of everyone who interacts with us. The way we collect, use, and protect your personal information is subject to the laws of the locations where we operate. This means we may have different practices in different locations. For more information, please see Data Processing and Jurisdiction , which includes additional descriptions of your rights and our obligations in certain key jurisdictions, and who to contact.

### 1. Data we can obtain from you

The information we can obtain from you depends on your relationship with us, whether as a Supplier, Customer, or Candidate. The data we may request includes your name, telephone number, email address, computer ID, mobile device ID, and IP address. This Privacy Policy also covers the personal information we collect from users who contact us by email and telephone.

If you provide us with your data through electronic means such as our official website, we inform you about the use of cookies and/or similar technologies.

A cookie is a data file that is stored on the hard drive of your computer or electronic communications device when you browse our website. It allows the exchange of status information between our website and your browser. This status information may reveal session identification, authentication, or user preferences, as well as any data stored by the browser regarding the website. The data obtained in this way allows us to offer you better service through our website. Most Web browsers allow you to manage your cookie preferences. To block cookies, you can adjust your browser to reject cookies or delete specific cookies.

You should generally also be able to manage similar technologies in the same way you manage cookies—using your browser preferences. The following links show how to adjust browser settings for commonly used browsers:

**Internet Explorer:**

<https://windows.microsoft.com/es-ES/windows-vista/Block-or-allow-cookies>

**Firefox:**

<https://support.mozilla.org/es/kb/habilita-y-deshabilita-cookies-que-los-sitios-we>

**Safari:**

<https://support.apple.com/kb/index?page=search&fac=all&q=cookies%20safari>

**Chrome:**

<https://support.google.com/chrome/answer/95647?hl=es>

**2. Purposes for which ADDIIVA ENTERPRISES processes your personal data**

ADDIIVA ENTERPRISES uses personal information to provide and improve the Services, manage our business, protect users, and enforce our legal rights. We use personal information to provide, personalize, and improve the Services (where permitted by applicable law), including:

- To send marketing and non-marketing communications to users.
- Handling user calls.
- Satisfaction surveys.
- Response to Petitions, Complaints and/or Claims. (PQR s).
- To learn more about our users and to recommend content that we think they will be interested in.
- For customer service.
- To improve the Services and the user experience of them
- For data analysis, research, product development and machine learning that allow us to better understand users and offer them innovations.
- To detect and protect against fraud, misuse and unauthorized use of the Services.

**3. Transfers of personal data**

ADDIIVA ENTERPRISES may share or transfer your personal data to different entities for the purposes set forth in this Privacy Notice. Please note that any of the transfers referred to below may be domestic or international.

Data submissions

ADDIIVA ENTERPRISES may transfer all or part of your personal data to service providers who support us in some process.

Transfers of personal data to our affiliates

ADDUIVA ENTERPRISES may share or transfer your personal data to other companies within the same corporate group. Our affiliates make reasonable efforts to implement measures and policies for the protection of personal data. These policies are consistent with ours and are designed to comply with the data protection laws of each country.

#### **4. Transfers of personal data to third parties**

ADDUIVA ENTERPRISES shares personal information with individuals and companies that help us operate the Services and conduct our business, whenever permitted or required by law. We also share personal information when a user requests it. We require those who provide us with personal information to comply with this Privacy Policy, unless they are informed of the application of a different privacy policy or notice. These providers are:

- Professional advisors, such as lawyers, accountants, insurers, and experts in information security and forensic analysis.
- Marketing providers who help promote the Services (for example, through email marketing).
- Cloud storage providers.
- Subsidiaries and partners of ADDUIVA ENTERPRISES.
- Competent law enforcement authorities, government regulators and courts when disclosure is necessary (i) to comply with the law, (ii) to exercise, establish or defend legal rights, or (iii) to protect the vital interests of users, business partners, service providers or other third parties.
- Other third parties with the user's authorization.

If we share personal information, we require recipients to handle it in accordance with this Privacy Policy and our confidentiality and security requirements. We will implement appropriate security measures to protect it in accordance with this Privacy Policy and applicable law. These security measures include the acceptance of contractual clauses for the transfer of personal information. When in effect, these agreements require our affiliates, suppliers, and partners to protect personal information in accordance with applicable privacy laws.

#### **5. How long does ADDUIVA ENTERPRISES retain personal information?**

We retain a user's personal information for as long as necessary for the purposes described above. We also retain personal information for as long as necessary to comply with legal obligations, resolve disputes, and enforce our agreements.

#### **6. Means available to Individuals to exercise their rights regarding Personal Data**

Users will have the right at any time to request from ADDUIVA ENTERPRISES access to their personal data and/or its rectification; likewise, you may request that your data be canceled, object to ADDUIVA ENTERPRISES processing said data for specific purposes and/or revoke the consent you have previously granted us to

process your data for any specific purpose (the "ARCO Rights"); please note that your ARCO Rights are subject to the limitations established by the laws of each jurisdiction, which you can consult in the section Data Processing and Jurisdiction.

If you are interested in exercising any of the ARCO Rights, you must send a written request to the email address to ADDIIVA ENTERPRISES indicated in this Privacy Notice. This request must contain at least the following: (i) your full name, complete address, and email address, where the corresponding response will be sent; (ii) attach documents that duly prove your identity, or, if applicable, your representation under oath; and (iii) a detailed, clear, and precise description of the personal data regarding which you wish to exercise any of the aforementioned rights.

In the case of exercising the right of rectification, the documentation that proves your request must be attached.

ADDIIVA ENTERPRISES will resolve your request within a period of no more than 20 (twenty) days from the day following receipt of the corresponding email, through the email address provided by you.

## **7. Modifications to the Privacy Notice**

ADDIIVA ENTERPRISES reserves the right to modify or update this Privacy Notice at any time. Any changes to this Privacy Notice will be published on our website and intranet. You can verify that the Privacy Notice has been updated because we will always display the date of the last update. If ADDIIVA ENTERPRISES makes any substantial changes to the processing of your personal data, we will notify you by email or by posting these changes on our website. Any changes to our Privacy Notice will take effect the day after they are published on our website. Please check this Privacy Policy periodically to ensure you are aware of the latest version.

## **8. Data Processing and Jurisdiction:**

### **RESIDENTS OF COLOMBIA**

#### **PROCEDURE FOR DATA SUBJECTS TO EXERCISE THEIR RIGHTS**

Any inquiry or complaint regarding the inherent rights of data subjects concerning their personal data must be submitted in writing to ADDIIVA ENTERPRISES, attaching a photocopy of the data subject's identity document or any other equivalent document that proves their identity and legal ownership. The company's address is Calle 13 # 15-53, Edificio Integra Centro de Negocios, Oficina 407, Pereira, Colombia, and the email address is [oficialdeprivacidad@addiuva.com](mailto:oficialdeprivacidad@addiuva.com)

The rights of access, updating, rectification, deletion, and revocation of authorization for the processing of personal data are strictly personal and may

only be exercised by the Data Subject. However, the Data Subject may act through a legal representative or attorney-in-fact when they are incapacitated or a minor, circumstances that prevent them from exercising these rights personally, in which case the legal representative or attorney-in-fact must prove their status.

If the inquiry or claim is incomplete, the claimant will be required to correct the deficiencies or errors within five (5) days of the claim's filing date. The claimant may complete it within five (5) business days of receiving the request. If the claimant fails to submit the requested information within one (1) month of the request date, the claim will be considered withdrawn.

The maximum time to resolve the claim is fifteen (15) business days, counted from the day after the date of receipt. If it is not possible to address the claim within this period, THE COMPANY will inform the interested party of the reasons for the delay and the date on which their claim will be addressed, which in no case may exceed eight (8) business days following the expiration of the first period.

Once the terms established by Law 1581 of 2012 and other regulations that govern or complement it have been fulfilled and exhausted, the Holder who is denied, totally or partially, the exercise of the rights of access, updating, rectification, In the event of suppression and revocation by the Company, the denial or disagreement with the right exercised may be reported to the National Authority for the Protection of Personal Data (Superintendence of Industry and Commerce – Delegation of Personal Data Protection -).

## **RESIDENTS OF MEXICO**

### **PROCEDURE FOR DATA SUBJECTS TO EXERCISE THEIR RIGHTS**

All users have the right, at any time, to request from ADDIUVA ENTERPRISES access to their personal data and/or its rectification. Likewise, you may request that your data be canceled, object to ADDIUVA ENTERPRISES processing said data for specific purposes, and/or revoke the consent you have previously granted us to process your data for any specific purpose (the "ARCO Rights"). Please note that your ARCO Rights are subject to the limitations established by law. To exercise your ARCO Rights, you must send your request to ADDIUVA ENTERPRISES at the following email address: [oficialdeprivacidad@addiuva.com](mailto:oficialdeprivacidad@addiuva.com) addressed to the Privacy Office.

If you are interested in exercising any of the ARCO Rights, you must send a written request to the email address to ADDIUVA ENTERPRISES indicated in this Privacy Notice. This request must contain at least the following: (i) your full name, complete address, and email address, where the corresponding response will be sent; (ii) attach documents that duly prove your identity, or, if applicable, your representation under oath; and (iii) a detailed, clear, and precise description of the

personal data regarding which you wish to exercise any of the aforementioned rights.

In the case of exercising the right of rectification, the documentation that proves your request must be attached.

ADDUIVA ENTERPRISES will resolve your request within a period of no more than 20 (twenty) days from the day following receipt of the corresponding email, through the email address provided by you.

## **RESIDENTS OF ECUADOR:**

### **PROCEDURE FOR DATA SUBJECTS TO EXERCISE THEIR RIGHTS**

Any query or claim regarding the inherent rights of data subjects concerning personal data must be made in writing to ADDUIVA ENTERPRISES, attaching a photocopy of the data subject's identity document or any other equivalent document that proves their identity and ownership in accordance with Law. The company's address is Avenida De los Shyris N 35-1754 and Suecia, Quito, Ecuador, email address [oficialdeprivacidad@addiuva.com](mailto:oficialdeprivacidad@addiuva.com).

The rights of access, updating, rectification, deletion, and revocation of authorization for the processing of personal data are strictly personal and may only be exercised by the Data Subject. However, the Data Subject may act through a legal representative or attorney-in-fact when they are incapacitated or a minor, circumstances that prevent them from exercising these rights personally, in which case the legal representative or attorney-in-fact must prove their status.

If the inquiry or claim is incomplete, the claimant will be required to correct the deficiencies or errors within five (5) days of the claim's filing date. The claimant may complete it within five (5) business days of receiving the request. If the claimant fails to submit the requested information within one (1) month of the request date, the claim will be considered withdrawn.

The maximum time to resolve the claim is fifteen (15) business days, counted from the day after the date of receipt. If it is not possible to address the claim within this period, THE COMPANY will inform the interested party of the reasons for the delay and the date on which their claim will be addressed, which in no case may exceed ten (10) business days following the expiration of the first period.

Once the terms indicated by the Law and other regulations that govern or complement it have been fulfilled and exhausted, the Holder who is denied, totally or partially, the exercise of the rights of access, update, rectification, deletion and revocation, by the Company, may make known to the Personal Data Protection Authority the denial or disagreement with the right exercised.

## **RESIDENTS OF CHILE**

### **PROCEDURE FOR DATA SUBJECTS TO EXERCISE THEIR RIGHTS**

Any inquiry or complaint regarding the inherent rights of data subjects concerning their personal data must be submitted in writing to ADDIVA ENTERPRISES, attaching a photocopy of the data subject's identity document or any other equivalent document that proves their identity and legal ownership. The company's address is Rosario Norte 100, Office 601, Las Condes, Metropolitan Region of Santiago, Chile, and the email address is [oficialdeprivacidad@addiuva.com](mailto:oficialdeprivacidad@addiuva.com).

The rights of access, updating, rectification, deletion, portability and revocation of authorization of personal data are strictly personal and may be exercised solely by the Holder. However, the Holder may act through a legal representative or agent when he is in a situation of incapacity or minority that prevents him from exercising them personally, in which case it will be necessary for the legal representative or agent to prove such condition.

The maximum period for acknowledging receipt and resolving a claim is thirty (30) calendar days, counted from the day following the date of receipt. If it is not possible to address the claim within this period, THE COMPANY will inform the interested party of the reasons for the delay and the date on which their claim will be addressed, which in no case may exceed an additional thirty (30) calendar days. Once the terms established by Law 19.628 on the Protection of Personal Data and other regulations that modify or supplement it have been met and exhausted, the Data Subject who is denied, in whole or in part, the exercise of the rights of access, updating, rectification, deletion, portability, and revocation by the Company, may appeal to the Courts of Justice under the terms, deadlines, and conditions established by Law No. 19.628.

## **RESIDENTS OF THE UNITED STATES**