



CORPORATE POLICY FOR THE TREATMENT OF PERSONAL DATA

Policy

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1 INTRODUCTION

Kushki, in its duty as the party responsible for the processing of personal data and in compliance with the regulations applicable to it for the protection of personal data, has defined and adopted this Corporate Policy for the processing of personal data. It contains the guidelines to guarantee habeas data and the guidelines for the processing of personal data for which it is responsible to ensure proper management.

2 OBJECTIVE

The purpose of this Policy is to establish the general guidelines that must be taken into account to ensure the proper management of the processing of personal data in compliance with the regulations applicable in each country where it operates; in compliance with this Policy, Kushki is aimed at the correct use and processing of the personal data contained in its databases and/or files, preventing unauthorised access by third parties internal or external to the company that may know or violate, modify, disclose and/or destroy the information contained therein.

Similarly, it aims to inform how Kushki collects and treats the personal information of all its stakeholders: customers, users, employees, suppliers, shareholders, partners, among others.

3 SCOPE

The Personal Data Processing Policy covers all administrative, organizational and control aspects. It applies to personal data stored in databases and/or files held by Kushki. This Policy is mandatory for all employees and third parties related to Kushki (customers, users, suppliers, shareholders, allies, among others) who work and have direct or indirect relationship with the company and access to information through documents, computer equipment, technological infrastructure and channels of the entity.

This Policy is applicable to the entire Kushki organization, however, there may be specific provisions for each country, which can be consulted in this Policy and related documents. In cases where there are differences between this Policy and country-specific provisions, the latter shall prevail.

4 DEFINICIONES

Authorization: is the prior, express, and informed consent granted by the data owner to carry out the processing of personal data.

Privacy notice: verbal or written communication developed by the person in charge, addressed to the owner for the treatment of their personal data, through which they are informed about the existence of the applicable data processing policies, the way to have access to them and the purposes of the processing intended to be given to the personal data.

Database: organized set of personal data subject to processing.

Successor in title: person who has succeeded another, due to their death (they may also be called heirs or legatees).

Consent: expression of the expression of will by the data owner.

Confidentiality: property of preventing access to unauthorized persons or limiting it to persons who by their function require it in order to minimize the disclosure of information to unauthorized persons.

Personal data: any information linked or that may be associated with one or several specific or determinable natural persons and which may identify them. For example, name, address, phone number, e-mail, marital status, among others.

Public data: data provided for as such, as well as all those that are not semi-private, private, or sensitive. Public data is considered, among others, data related to the marital status of people, their profession or trade and their quality as a merchant or public servant. Given its nature, public data may be contained, among others, in public records, public documents, official gazettes and bulletins, and duly enforced court decisions that are not subject to reservation.

Private data: is data that, due to its intimate or reserved nature, is only relevant to the owner of the information.

Semi-private data: data that is not of an intimate, reserved, or public in nature and which knowledge or disclosure may be of interest not only to its owner but to a certain sector or group of people.

Sensitive data: data that affects the privacy of the owner, or which improper use may generate discrimination, as it may reveal their racial or ethnic origin, political orientation, religious or philosophical convictions, membership in trade unions, social organizations, human rights, or that promote interests of any political party or that guarantee the rights and guarantees of opposition political parties as well as health, sexual life, and biometric data.

Processing manager: natural or legal person, public or private, that by itself or in association with others, performs the processing of personal data on behalf of the data controller.

Personal information: any information that may be used to identify a specific person or any anonymous information (for example, IP address) that is linked to a specific person (customer, business, consumer, cardholder, supplier, or business partner).

Entity responsible for data processing: natural or legal person, public or private, that by itself or in association with others, performs the Processing of personal data.

Holder: natural person whose personal data is being processed. To Kushki, the clients, users, workers, suppliers, partners, shareholders, visitors, our interest groups, and any other natural person whose data is processed by Kushki, either directly or indirectly, shall be the owners of the information. As for minors, their legal representatives shall have the power to authorize or not the processing of their personal data.

Data transfer: it takes place when the entity responsible and/or in charge of processing personal data submits information or personal data to a receiver, who in turn is responsible for processing it.

Data transmission: processing of personal data that implies the communication thereof, for a person in charge to process it on behalf of the responsible entity.

Processing: any operation or set of operations related to personal data, such as the collection, storage, use, circulation, or deletion thereof.

5 GUIDING PRINCIPLES ON PERSONAL DATA PROCESSING

Kushki undertakes to the data subjects to treat their personal data in accordance with the following principles:

Principle of legality applied to data processing: Kushki processes data in accordance with the applicable regulations.

There may be additional legal bases for the processing of personal information in some countries. The foregoing depends on the applicable regulation and the products and services that are offered.

Personal information is processed only if Kushki is validly authorized to do so thus, explicit consent shall be requested if current laws so require. For information on when and where explicit consent is required, please refer to the Policy for each country in Appendix A.

Principle of purpose: Kushki, previously authorized by the owner, will process the data for a legitimate purpose, in accordance with the applicable regulations, which the owner is informed of.

Principle of freedom: Kushki processes data only with the prior, express and informed consent of the owner. Personal data must not be obtained or disclosed without prior authorization or in the absence of a legal or judicial mandate.

Kushki shall request authorization so that data owners grant their prior, express, and informed consent for processing of their personal data.

Insofar as the legislation of each country so permits, authorization may also be obtained based on unequivocal conduct on the part of the data subject, which allows a reasonable conclusion to be drawn that he/she has given his/her consent to the processing of his/her information. Such conduct must clearly externalize the will to authorize the processing.

The consent of the owner may be obtained by any means, provided that the legislation of each country permits it, which may be subject to subsequent consultation and in accordance with the means authorized by each of the legislations of the countries in which the data is processed. By virtue of its nature and corporate purpose, Kushki receives, collects, records, retains, stores, processes, modifies, reports, consults, delivers, transmits, transfers, shares and deletes personal information, for which it obtains the prior authorization of the owner.

Kushki retains proof of such authorizations in an appropriate manner, ensuring and respecting the principles of privacy and confidentiality of information.

In accordance with the regulations applicable to Kushki, the owner's authorization is not required in the following cases:

- Information required by a public or administrative body in the exercise of its legal functions or by court order
- Data of a public nature
- In cases of medical or health emergency
- Processing of information authorised by law for historical, statistical or scientific purposes
- Data related to the birth registration of persons

By virtue of the above, Kushki may obtain authorization from the owner of the data through different means, such as verbal or written authorization, whether the latter is granted through physical or virtual channels designed for this purpose.

Principle of truthfulness or quality: the information that is subject to processing must be truthful, complete, up-to-date, verifiable, and comprehensible. Kushki prohibits the processing of fractioned or misleading data.

Principle of transparency: Kushki is aware that data subjects have the right to obtain, at any time and without restriction, information about the existence of data concerning them.

Principle of restricted access and circulation: processing is subject to the limits derived from the nature of the personal data, in accordance with the provisions of the regulation.

In this sense, the processing may only be carried out by persons authorised by the owner and/or by the persons provided for by law. With the exception of public information, Kushki does not make personal data available on the internet or other means of dissemination or mass communication, unless access is technically controllable to provide restricted knowledge only to the holders or authorised third parties in accordance with the law.

Kushki guarantees that the owner of the data can access his/her personal information, so that he/she can exercise his/her right to modify, correct, update, delete or refuse to allow it to be processed, in the terms applicable in accordance with the applicable legislation in his/her country.

Similarly, the owner of the data may exercise the rights described above, unless Kushki must retain the personal information in order to comply with its legal obligations or by mandate of a court order or competent authority.

Principle of security: the information subject to processing by the data controller or data processor referred to in this Policy may be handled with the technical, human and administrative measures necessary to ensure the security of the records, avoiding their adulteration, loss, consultation, unauthorised or fraudulent use or access.

Principle of confidentiality: all persons involved in the processing of personal data that are not of a public nature are obliged to guarantee the confidentiality of the information, even after the end of their relationship with any of the tasks involved in the processing, and may only supply or communicate personal data when this corresponds to the development of the activities authorised in this law and under the terms of the same.

Principle of privacy and good name: the information subject to processing by the data controller or data processor must be assessed within the canons of respect for the privacy and good name of the data subjects, and the processing of data that violate their principles is prohibited, except as permitted by law.

Principle of data relevance: only data that are adequate, relevant and not excessive in relation to the purpose for which they are obtained or processed are processed.

Accountability principle: accountability requires the active implementation by data controllers of measures that promote and ensure data protection in their processing activities.

6 RESPONSIBLE FOR THE PERSONAL DATA PROCESSING POLICY

As the party responsible for the processing of personal data, the data subject acknowledges that the company responsible for the processing is the company of the Kushki companies that is associated with the country in which the data subject is located or, failing that, the company with which he/she has a contractual relationship.

Kushki has appointed a Data Protection Officer to assume the function of protecting personal data, who must ensure compliance with this Policy and the associated documents.

The main function is to design, build, organize, implement, manage, and constantly update the comprehensive personal data management programme within the organisation, which allows Kushki to comply with the regulations on personal data protection, as well as to establish controls, evaluation and ongoing review.

7 PERSONAL DATA PROCESSING

7.1 Personal information and types of personal information collected

Depending on the way in which the data holder interacts with KUSHKI, whether online, by phone or in person, the different categories of personal information may be collected, used, received, stored, analyzed, transferred, or processed accordingly.

The personal information that may be collected is:

- **Identity information and account access:** full name, position, identity number and date of birth.
- **Contact information:** phone number, postal address, country, e-mail address and selected billing address.
- **Financial information:** bank account details, credit, or debit card information.
- **Payment information (transaction information):** personal account numbers, names on a credit card, merchant name and identifiers, date and amount of a transaction and other information directly provided by owner, banks, or merchants.
- **Technical and usage information:** IP addresses, browser type and version, operating systems, time zone settings, geolocation information, content and pages accessed from our websites, applications or platform, any paths used.

- **Information on credits and loans:** financial information (for example, credit score) and income information (for example, employment contract).
- **Marketing information and communications:** communication with customer service, behavioral data (for example, those collected through cookies), information on special offers, surveys, advertising campaigns and records on your decision to subscribe or unsubscribe to marketing material.
- **Employment and educational background information:** corresponds to employment, academic and related information.

It is important to mention what personal information does not include:

- Information that has been aggregated or made anonymous in such a way that it cannot be associated with a specific natural person (statistical or demographic data).
- Personal information found in publicly accessible sources, accounts such as, but not limited to, public records, public documents, official gazettes, and bulletins, and duly enforced court decisions that are not subject to reservation. Personal information found in publicly accessible sources, regardless of the means by which said source is accessed, may be processed by any person as long as it is public by nature.
- When Kushki websites or applications contain links to websites, such as third-party plug-ins and applications (including cookies, tracking technologies and widgets from third-party advertisers), by accessing those links or connections, the data owner may be allowing third parties, other than Kushki, to collect or share their data. Kushki has no control over third-party websites and assumes no responsibility for the processing of personal information that may be provided to said third parties.

Kushki does not collect personal information or sensitive data such as detailed information about race, ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, union membership and biometric and genetic information.

7.2 Collection of personal information

Overall, Kushki treats or collects personal information in the following ways:

- When supplied directly to Kushki through our website, software, applications or offers of products or services, to enter into contracts with employees, service providers.
- When Kushki obtains verification information on the data owner through third parties authorized for this purpose, or if it is available to the public as permitted by the current laws, including information on:
 - Our merchants, partners from the payment industry and financial institutions
 - Platforms and social media when authorized
 - Financial institutions and fraud prevention agencies for the purpose of conducting risk and fraud assessments or analyses.
 - Third parties with whom contracts have been entered into to support company operations.
 - Sources of public access, in accordance with the local laws in force in the country.

- Credit reference agencies or centrals, financial information operators or banks, in accordance with the current laws.
- Passively, through our technology including, but not limited to, cookies, web beacons, and similar techniques
 - Cookies
 - As in other web pages of business nature, Kushki uses cookies and other technologies to remember information that cannot be associated to a specific natural person, for which reason it is not processed by Kushki as personal information.
 - Cookies are small files with data stored in the browser of the user's device when visiting a web page. This file stores certain information about the user, such as their behavior, browsing habits on the Internet or the user's access credentials.
 - Internet cookies can have different functions, but in general it can be said that they are used so that the server of a web page can identify the user's computer and remember important data, basically who the user is and what he/she has previously done on the web, making the online experience easier and more personalized.
 - Information collected by cookies and web server log files may include information such as, but not limited to, the date and time of visits, pages viewed, IP addresses, links to/from any page and the time spent on the web page.
 - This information is used to design and display the website optimally based to the user's preferences. Accordingly, only the cookie is identified on the user's device. Apart from this, the user's personal data is only saved with the express consent or when strictly necessary in order to be able to use the service offered to the user and therefore accessed by the user.
 - Web Beacons
 - A Web beacon is an electronic image, also called a single-pixel (1 x 1) or transparent pixel, that is embedded in the code of a web page. A web beacon has similar purposes to cookies. Additionally, a web beacon is used to measure user traffic patterns from one page to another to maximize how traffic flows through the web.
 - It is expressly clarified that this policy covers the use of cookies on the Kushki websites and not the use of cookies by advertisers. Kushki does not control the use of cookies by third parties.
 - For this purpose, a procedure for the use of cookies in each of the relevant websites or applications of Kushki and the possibilities that the user as a visitor to each website or application has regarding the use of cookies is contemplated.

7.3 *Processing of sensitive data*

For the processing of sensitive data, Kushki shall have the following considerations:

- For the processing of this type of information, owners are not required to give their authorization or consent.

- It is explicitly and previously informed what kind of sensitive data will be requested and about the possibility of providing them or refusing to provide them.
- The owner of the data is informed about the treatment and purpose that will be given to the sensitive data.
- The authorization of sensitive data is prior, express and clear.

7.4 Data on children and/or adolescents

Kushki shall ensure that the processing of this type of data is carried out in accordance with the rights of minor children and adolescents. Accordingly, these shall be protected in a special form so as to ensure respect of their fundamental rights, in accordance with the regulations in force in each country.

To comply with the foregoing, Kushki shall act in accordance with the following:

- Kushki does not collect, use, or voluntarily or actively disclose personal information of minors, in accordance with the equivalent minimum age in the relevant jurisdiction, without the prior consent of the parents or guardians of the child or adolescent and the exercise of the minor's right to be heard, which opinion will be valued taking into account their maturity, autonomy and ability to understand the matter, in order to carry out the processing of their personal data.
- They will be informed explicitly and in advance on the data processing and its purpose.
- Kushki services are not intended or designed to be used by minors.
- If personal information has been collected from a minor without first obtaining the consent of their parents and verifying it, actions will be taken to eliminate the information as soon as possible.

7.5 Purpose of information processing

Kushki, previously authorized by the owner, shall process the data with a legitimate purpose, in accordance with the applicable regulations, which will be informed to the owner, among others, to:

- Perform the legal obligations of Kushki.
- The legitimate interests of Kushki or of a third party, for the exercise of its function or the fulfillment of its mandate, ensuring that their fundamental rights prevail over the legitimate interests of Kushki.
- The performance of a contract established directly or indirectly, as appropriate.
- Update the current contractual relationships and perform the agreed obligations.
- Market Kushki products and services.
- Processes of selection of workers, suppliers and customer registration processes.
- Data analysis and reporting.
- Carry out marketing and communication activities. This purpose is subject to the applicable laws of the country where the marketing and communication activity is to be carried out. Likewise, in accordance with the applicable local regulations in each country, acceptance may be required before receiving advertising communications from Kushki.

- Kushki may conduct these marketing activities directly or through promoters.
- Conduct research, develop and improve our products and services.
- Query, report and update their data before information and risk operators.
- Manage the relationship with our stakeholders.
- For any other legitimate purpose authorized by the data owner.

7.6 Information retention

Kushki may store personal information for as long as necessary to fulfill the purposes for which it was collected.

Likewise, the retention of personal information by Kushki is determined considering compliance with legal (contractual or regulatory), accounting and compliance reporting obligations and, the terms established by business or data privacy laws in each country, where Kushki provides its services.

In any case, data shall be retained for no less than 10 years.

8 RIGHTS OF PERSONAL DATA HOLDERS

In accordance with privacy and data protection laws, the personal data holders may exercise their rights to:

- **Access to personal data:** they are entitled to ask if we process their personal information and may request that detailed information be provided on their personal information subject to processing by us, in accordance with the applicable laws in each country.
- **Rectify or correct personal data:** at any time, they may request the correction or change of their personal information that has been processed incorrectly.
- **Remove personal data:** they may request to delete or erase personal information when the information is no longer needed for the purposes for which it was collected, subject to local legal data retention obligations.

Kushki reserves the right to keep certain personal information or not to delete it at the request of the owner in those cases where deleting it would imply a disproportionate technical effort (e.g., having to develop a program or software to be able to delete personal information) or may endanger the personal information of other users, in which case it will be brought to the full attention of the owner.

The request to delete or remove personal data shall not proceed when owners thereof have the legal or contractual duty to keep them in the Kushki database.

- **Withdraw consent:** you may withdraw the consent to processing you have given and prevent further processing, if there are no other legal reasons for the processing of personal information.

The request to withdraw personal data does not proceed when the holders have a legal or contractual duty to remain in Kushki's database.

- **Limit the processing of personal data:** you may request to limit the processing of certain personal information in certain circumstances, such as an objection to Kushki's processing of personal information based on our legitimate interests.

- **Request data portability:** you may request that the personal information you have provided be transmitted to a third party in a machine-readable format.
- **Object to automated decision making,** including characterization, if such decisions have a legal effect as the holder of the personal information. You may also object, among others, in the following cases: i) If the processing affects your fundamental rights and freedoms; ii) If the processing is done for direct marketing of goods, products or services; iii) If the processing is done with respect to data obtained from a publicly available source and there is no other legal basis for processing.
- **Submit requests and complaints:** you may submit requests and complaints about our processing of personal information directly to Kushki, the data protection regulator or the competent authority, as applicable in each country.

Kushki seeks to provide reasonable assistance to meet the requests of the owners on the processing of personal information and any rights therein, in the applicable terms according to the local laws of each country.

The rights above may be exercised by the following persons:

- By the holder, who shall duly prove their identity by the different means made available by the person in charge.
- By their heirs, who must prove such relationship with the holder.
- By the representative and/or proxy of the holder, prior accreditation of an agency relationship or with a Power-of-Attorney.
- By a transfer from one person to another.
- The rights of children or adolescents shall be exercised by the people who have been authorized to represent them.

9 OBLIGATIONS OF KUSHKI

As the entity responsible for the personal data stored in its databases, Kushki undertakes to:

- Guarantee the owner of the personal data the full and effective exercise of their rights.
- Guarantee the holder of the Habeas Data action and the laws of the country.
- Request and keep a copy of the authorization given by the owner or proof thereof.
- Inform the owner of the purposes of collecting it, the use given to their personal data and their rights based on the authorization given.
- Keep the information in safe conditions to prevent its alteration, loss, query, use or unauthorized access.
- Securely delete personal data that for any reason no longer has a lawful basis to be held in safekeeping.
- Guarantee that the information provided to third parties, or the processing entity is true, complete, exact, updated, verifiable and readable.
- Update the information held by a third party or responsible entity, related to any updates to the data provided and take the required measures to keep said information is up to date.

- Ensure that third parties and/or those in charge of processing the personal information held by Kushki have effective measures and policies in place to ensure its proper processing and the security and privacy conditions of the data shared with them and cause them to keep the same level of protection adopted by Kushki at least.
- Rectify any mistaken information when spotted.
- Process queries and claims made in accordance with the provisions herein and under the law.
- Inform the data protection authority when there are security violations and there are risks in the administration of the information of the owners.
- Anonymize the personal data of the owners, provided that they are classified as sensitive.

10 PROCEDURE TO SUBMIT INQUIRIES, COMPLAINTS AND CLAIMS

The holders of personal data may submit queries, complaints or claims through the channels defined in section 11 of this Personal Data Processing Policy called Channels of attention for queries, complaints and claims, whose response times are subject to those set by the applicable law in each country, which is detailed in Appendix A of this Policy. Holders must follow the following procedures:

10.1 Inquiries

Holders, their heirs, or any other person who may have a legitimate interest, may request to be informed about their personal data held in any Kushki database.

In accordance with the foregoing, Kushki shall guarantee their right of consultation, by disclosing their personal information to a given holder.

Inquiries that deal with issues related to access to information, proof of the authorization granted by the holder, uses and purposes of personal information or any other inquiry related to the personal information provided by the owner, must be submitted through the channels enabled for that purpose by Kushki.

10.2 Complaints / claims

Owners, their heirs, or any other person with a legitimate interest therein, who deems that the information contained in any of the Kushki databases should be corrected, updated, or deleted, or who become aware of a potential failure to perform the obligations herein or under the law, may file a claim.

The claim is formulated by a request addressed to Kushki, taking into account the following requirements:

- Identification of the holder or person filing a claim, by stating their name and ID number.
- Description of the underlying reason that gave rise to the claim in a clear and express way, describing the facts that originated it, by attaching all required documents.

- Accreditation of the legitimate interest of the person submitting the claim to file it by attaching, if necessary, the relevant supporting documentation.
- Specify the telephone number, and physical or electronic address for service to receive an answer to the request.

Procedure:

- If the claim is incomplete, the interested party will be required to correct the faults. If after two (2) months from the date of the requirement, without the applicant submitting the required information, Kushki will understand that the claim has been abandoned.
- In the event that whoever receives the claim submitted is not competent to resolve it, it will be transferred to the appropriate person within a maximum period of two (2) working days and the interested party will be informed of this situation.
- When the claim is received complete, a legend will be included in the database stating "claim in process" and the reason for it.
- The owners, their heirs or any other person with a legitimate interest, may file a complaint with the competent authorities in each country, but only once they have exhausted the consultation process or claim to Kushki, as responsible and/or any person in charge.

In those cases where requests to delete information and/or revoke any authorization are received, Kushki has adopted an internal process which is to be followed in said cases.

11 CHANNELS TO ADDRESS INQUIRIES, COMPLAINTS AND CLAIMS

Kushki has enabled the following channels, for personal data owners to exercise their rights to know, update, correct and/or delete their personal information:

- **E-mail:** to file a claim and make inquiries about the handling of personal data and/or to raise any concerns about this Personal Data Processing Policy, data owners may do so via e-mail at: support@kushkipagos.com
- **Web page:** at the KUSHKI website, data owners may further contact Kushki through the "Send request" option from the "Contact us" section therein, even for suggestions, kudos or to request information.

12 INTERNATIONAL TRANSFER AND TRANSMISSION OF PERSONAL DATA

Kushki, as responsible for the personal information stored in its databases and in the development of the purposes described in this Policy, may eventually make national or international transfer or transmission of data.

Kushki, by virtue of this exchange relationship, has adopted guidelines in order to protect the information subject to this activity, such as in general:

- Checking the level of protection and security standards of the country receiving the personal information by validating whether it is on the list of countries that offer an appropriate level of data protection and, failing that, the current regulations in the receiving country will be reviewed.

- Sign a legal instrument of transfer that guarantees the protection of the personal data to be transferred.
- Validating the policies and procedures of the person in charge or responsible (as appropriate), to determine if the conditions are ideal to ensure adequate levels of security for the information subject to transmit or transfer.
- Kushki may store Personal Information in use that may not be under the direct control of Kushki; for instance, on servers or databases located with hosting providers.

In any case, Kushki shall not transmit information to servers located in other countries, unless those countries provide appropriate levels of personal information protection.

13 *RELATIONSHIP WITH THIRD PARTIES AND/OR RESPONSIBLE FOR DATA PROCESSING*

By virtue of this relationship, Kushki has adopted various guidelines to hold relationships with third parties, in order to protect the information for which it is responsible for its treatment, among others, the following ones

- Making sure that third parties with which it is linked, responsible for the processing of personal information for which Kushki is responsible and/or establish commercial, labor or alliance relationships, adapt their personal data protection processes to the provisions of this Policy in accordance with the regulations in force and particular in each country.
- Request from third parties and/or those in charge of relevant data protection to verify and observe compliance with the provisions contained in this Policy and the applicable regulations in force, for the protection of personal data, without prejudice to all documentation, models and means provided for the request of authorization for the treatment, privacy notices, records and contractual and/or legal coverages.
- Accordingly, Kushki may request third parties and/or managers to prove, through certification, before, during or after the relationship that binds them, compliance with the requirements of the personal data protection regime, which are to be at the same level of protection adopted by Kushki at least. Consistent with this, Kushki may request an eventual or periodic review and supervision of compliance with the legal and/or contractual requirements, through evidence or support of the processes carried out, make visits to third party's facilities, among other activities that may be arranged to validate compliance.
- Have procedures so that once the legal or contractual relationship with the third party and/or person in charge of the personal information has ended, they collect, eliminate, destroy, or carry out any other activity that Kushki deems appropriate to properly process any information that has been shared with said third party and/or person in charge.

14 *PERSONAL DATA SECURITY*

Kushki handle the information subject to the processing as provided for by law, by adopting the technical, human, and administrative measures that may be necessary to keep the personal information confidential and secure to prevent its alteration, loss, query, unauthorized or

fraudulent use or access, in accordance with the regulatory requirements and exceptions applicable in each country.

Although no data transmission may be guaranteed as 100% secure, Kushki adopts reasonable and sufficient security measures to protect all personal information.

Access to personal information is limited (via user/password credentials and software systems) to those employees who require it to discharge their job duties. Likewise, the industry-standard Secure Socket Layer (SSL) encryption is used to bridge the account sign-up process and account opening information. Other security measures include, but are not limited to data encryption, firewalls, and physical access controls to buildings and records.

Kushki manages the protection of payment card information with the highest security standards in the payment industry, so it performs a regular audit in order to maintain the highest level of security certification with the PCI Payment Card Information Security Standards Council, regarding the protection of card data, maintaining the certification in PCI DSS, (Payment Card Industry Data Security Standard).

Likewise, Kushki manages information security with the highest standards of security, so it performs periodic audits to maintain current certification in the ISO 27001 standard.

In the event of a breach of personal information, Kushki notifies the owner of the data and the respective regulator or authority, in cases where the regulation so requires.

Kushki regularly reviews the policies on the collection, storage, and processing of personal information, including physical security measures to keep the personal information secure.

For all of the above, Kushki is not responsible for illegal interceptions or violation of the systems or databases of the owner of the personal data by unauthorized persons, either by not having, among others, adequate security measures for their devices and/or for their access, nor is it responsible for the improper use of the information obtained by such means.

15 *PERSONAL DATA CONFIDENTIALITY*

Kushki does not sell, rent, share or disclose personal information except as set forth in this policy. It may happen that by virtue of court orders, or legal regulations, Kushki may be required to disclose information to authorities or third parties in some circumstances. Kushki will do everything in its power to protect the privacy of the information. However, the foregoing notwithstanding, in cases where third parties may intercept or access certain information of the holder in their databases or data transmissions on their devices in which case Kushki is not responsible for the information that is disclosed.

Kushki may not share/disclose personal information about those it processes with internal third parties, corresponding to globally related companies, for the purpose of:

- Provide technical and support services to such internal third parties and receive some of these services from them.
- Contribute to the research, analysis, and study of data to improve the products and services that Kushki and other internal third parties provide, respectively.

Similarly, Kushki may share personal information with **external third parties**, such as:

- Merchants in accordance with agreements for the provision of services (also known as terms and conditions or contracts). To process card payments, we may be required to share a buyer's credit card details with the merchant to which the payment relates.
- Authorized financial institutions with whom Kushki may partner to jointly create and offer products and services. Depending on the type of payment selected by the client, payer, or buyer, Kushki will share the information with said institutions that validate and process each form of payment for the relevant approval, validation, and settlement. This means that personal information may be collected for such purposes by the financial institutions that issue the form of payment, acquiring financial institutions, payment processing networks and franchises such as Master Card, Visa, among others.
- Operators of financial databases and/or risk or credit or financial information centers to report financial information and carry out the relevant risk analysis, in accordance with what is allowed by law.
- Service providers or contractors that support the company's operation.
- Companies with whom a merger, spin-off, acquisition, reorganization, liquidation, or other similar event is planned, in which case the newly formed entity or the acquiring entity will be required to comply with this Privacy Policy in its entirety with respect to personal information processed by Kushki.
- Competent regulatory entities or organizations to demand from Kushki, by way of subpoena, court order or similar legal procedure, personal information for matters within their competence or when Kushki believes in good faith that disclosure is necessary to prevent physical harm or financial loss, to report suspected illegal activity or violation to our Terms of Service.
- Kushki will only disclose personal information as a response to requests, if it believes in good faith that doing so is necessary to comply with applicable law or to fulfill a legal request from a competent authority. Once such requests are received, reasonable efforts will be made to give timely notice to the data owner so that he or she may challenge it, if deemed appropriate. Such notice will not be provided if it is determined in good faith that: (i) Kushki is not permitted to supply it under the applicable law, or (ii) doing so would result in an imminent risk of death, serious physical injury, or significant loss of property or damage to Kushki or a third party.
- International organizations with whom Kushki partners to offer and/or develop products and services subject to the requirements of this Policy and the applicable laws.
- Companies with which merger, spin-off, acquisition, reorganization, liquidation, or other similar events are carried out, when any personal information eliminated from the Kushki databases may be transferred to the successor or the entity to which it may be assigned. In these cases, Kushki will timely inform data holders about the occurrences of an event of this nature.

In all cases, Kushki adopt all reasonable measures to guarantee that any third party involved in the processing of personal information has taken the necessary technical and organizational measures, including the relevant service or data transmission and transfer contracts, as appropriate.

16 POLICY VALIDITY

Kushki reserves the right, in its sole and absolute discretion, to make changes to this Personal Data Processing Policy without prior notice.

If substantial changes are made to the content of this Personal Data Processing Policy, especially those related to the purpose of collecting personal information, Kushki may choose to notify users through an additional notice that may be posted on the website or sent via email registered in our databases; otherwise no communications will be issued and the Data Subject may review this Personal Data Processing Policy periodically for updates.

By using Kushki's services and consenting to this Personal Data Processing Policy, the holder acknowledges that notifications and notices sent by any electronic means have the same meaning and effect as if it had been provided with a paper copy. Notices and warnings that relate to this Personal Data Processing Policy were deemed to have been received by the holder of the information within the first 24 calendar hours from the time they were posted on the website or sent by email to the account registered in Kushki's databases, unless a notice is received indicating that the email sent could not be delivered to the registered address.

If after this time the data owner fails to contact Kushki with any objections, it will be understood that said user has agreed to the new terms.

For Kushki is important to ensure that the personal information it maintains is correct and updated, so it is requested periodically to the owner of the data to update it and that any change is informed in a timely manner, through the channels provided for this purpose.

17 REFERENCES

- Brazilian Law 13.709
- Colombia Law 1581
- Costa Rican Law N°8968 and Executive Decree N°37554
- Chilean Law No. 19,628 ("LPD"), Law No. 21,096, Law No. 20,575 and Law No. 21,214
- Constitution of the Republic of Ecuador, the Organic Law on Personal Data Protection and Resolution No. 009-NG-DINARDAP-202
- Political Constitution of the Republic of Guatemala
- Federal Law for the Protection of Personal Data in Possession of Individuals (DOF 05-07-2010) and Regulations (DOF 21-12-2011)
- Law of Nicaragua No. 787
- Panama Law No. 81
- Peruvian Law 29733 and Supreme Decree 003-2013-JUS
- California Consumer Privacy Act, Cal. Civ. Code 1798.100 et seq. (CCPA)

18 RELATED DOCUMENTS

- Not apply

19 CHANGE CONTROL

Versión	Fecha	Cambios realizados
V1	15/06/2023	First version.

APPENDIX A

APPLICABLE REGULATIONS ACCORDING TO THE COUNTRIES WHERE KUSHKI OPERATES

The following general terms are taken as a reference for the processing of your requests, queries and/or claims regarding the protection of personal information. However, depending on and/or exceptional situations in the region, the terms of response may vary according to the applicable local regulations.

Without prejudice to the application of the general procedure established in this Policy and depending on the country in which the personal data is collected, some territories have been identified in which Kushki makes the treatment and that local laws provide specific stipulations regarding the terms of response, therefore, in addition to applying the provisions of this Policy applies jointly the regulations mentioned in this annex in accordance with the territory and / or region (s) that is (are) relevant and applicable (s).

BRAZIL

For information and personal data whose processing is carried out in Brazil, the procedures for the exercise of the rights of the holders will be provided for in Law 13.709 of 2018, or any that updates, extends and/or replaces it. With the express acceptance of this Personal Data Processing Policy you grant us your authorization to transmit and/or transfer your information and personal data to third countries in which we operate, which may have levels of personal data protection different from those required in Brazil.

Brazilian Law guarantees you the rights of Information, access, information content, rectification, updating or deletion of your personal data. The responsible for the database must comply with the request of the owner of the information, free of charge, within the term established by law.

COLOMBIA

For information and personal data whose processing is carried out in Colombian territory, the procedures for the exercise of the rights of the holders will be as provided in Law 1581 of 2012 and its regulatory decrees, or any that update, extend and / or replace it. With the express acceptance of the Personal Data Treatment Policy, you grant us your authorization to transmit and/or transfer your information and personal data to third countries in which the companies operate which may have levels of protection of personal data different from those required in Colombia.

Colombian law guarantees you the rights to know, update and rectify your personal data before the Data Controllers or Data Processors, as well as to request proof of the authorization granted to the Data Controller and/or revoke the authorization or deletion of the data within the term established by Law.

The Data Subject may only file a complaint before the Authority, once he/she has exhausted the consultation or complaint process before the Controller, as a procedural requirement, being the Superintendence of Industry and Commerce the Authority for the protection of personal data.

<https://kushkipagos.com/legal/politica-de-tratamiento-de-datos-personales-colombia>

COSTA RICA

For the case of information and personal data whose processing is carried out in Costa Rica, the procedures for the exercise of the rights of the holders, will be provided for in Law No. 8968 and regulated by Executive Decree No. 37554, or any other that updates, extends and/or replaces it.

With the express acceptance of this Personal Data Treatment Policy, you grant us your authorization to transmit and/or transfer your information and personal data to third countries in which we operate, which may have different levels of personal data protection than those required in Costa Rica.

Costa Rican law guarantees you the rights of access, rectification, suppression and to consent to the transfer of your personal data. The person in charge of the database must comply with the request of the owner of the information, free of charge, within the term established by law.

CHILE

For information and personal data whose processing is carried out in Chile, the procedures for the exercise of the rights of the holders, will be provided for in Law No. 19,628 ("LPD"), Law No. 21,096, Law No. 20,575, Law No. 21,214, or any other law that updates, extends and/or replaces it. With the express acceptance of this Privacy Policy, you grant us your authorization to transmit and/or transfer your personal information and data to third countries in which we operate, which may have different levels of personal data protection than those required in Chile.

Chilean law guarantees you the rights of access, deletion or cancellation, modification and blocking. The Responsible must respond to the request within the term established by law.

<https://kushkipagos.com/legal/politicas-de-privacidad-chile>

ECUADOR

For information and personal data whose processing is carried out in Ecuador, the procedures for the exercise of the rights of the holders, in accordance with Article 66 numeral 19 of the Constitution of the Republic of Ecuador, the Organic Law for the Protection of Personal Data and Resolution No. 009-NG-DINARDAP-2021.

The Ecuadorian Law guarantees the rights of information, access, rectification and updating, deletion, opposition, portability and suspension of treatment. The Responsible Party must respond to the request within the term established by Law.

<https://kushkipagos.com/legal/politicas-de-privacidad-ecuador>

GUATEMALA

Habeas Data governs, which seeks to protect the right to privacy and intimacy, to information and informational self-determination of a person, before the records or databases that consist of it. Using as normative several articles of the Political Constitution of the Republic of Guatemala that seek to protect the privacy and intimacy of persons, recognized in the legislation of Guatemala, as a human right and inherent to every person.

As well as, Article 11 of the American Convention on Human Rights. Article 5 of the American Declaration of Human Rights, which reiterates the protection of the dignity of the person. Likewise, Article 17 of the International Covenant on Civil and Political Rights establishes that no one shall be subjected to interference in his private life.

In turn, the Law of Free Access to Public Information contemplates limits precisely for the protection of all those personal data, since, without the consent of the owner, they cannot be distributed and they must be aware of the information about them contained in those files, records, etc.

MEXICO

For information and personal data whose processing is carried out in Mexico, the procedures for the exercise of the rights of the owners will be as provided in the Federal Law on Protection of Personal Data Held by Private Parties (DOF 05-07-2010), with its respective Regulations (DOF 21-12-2011) or any that update, extend and / or replace it.

With the express acceptance of this Data Processing Policy you grant us your authorization to transmit and/or transfer your information and personal data to third countries in which we operate, which may have different levels of protection of personal data than those required in Mexico.

Mexican law guarantees you the rights of access, rectification, cancellation or opposition to the processing of your personal data, when the request is appropriate, within the period established by law.

Kushki will not be obliged to cancel the information and personal data in the cases established in article 26 of the Federal Law of Personal Data Protection, as well as when the holder has a legal or contractual duty to remain in the database, in the terms established by law.

<https://kushkipagos.com/legal/aviso-de-privacidad-integral-mexico>

NICARAGUA

For information and personal data whose processing is carried out in Nicaragua the procedures for the exercise of the rights of the holders, according to Law No. 787, Approved on March 21, 2012.

The Nicaraguan Law guarantees the rights to request and obtain information of their personal data processed in public and private data files, rectify, modify, delete, suppress, supplement, include, update or cancel their personal data.

PANAMA

The information and personal data whose processing is carried out in Panama, apply the procedures for the exercise of the rights of the holders, in accordance with Law No. 81 of March 26, 2019 on Personal Data Protection.

The Panamanian Law guarantees the rights of Right of access, rectification, cancellation, opposition, portability. Which can be exercised at any time by the holder and are inalienable.

PERU

Personal data are processed in accordance with Law 29733 and Supreme Decree 003-2013-JUS (hereinafter the law and its regulations).

The Peruvian Law guarantees the right of access of the holder of personal data, update, inclusion, rectification and deletion, prevent the supply, opposition, guardianship and be compensated. The responsible must respond to the request within the term established by law.

<https://kushkipagos.com/legal/politica-de-privacidad-peru>

UNITED STATES

For information and personal data processed in the United States, where applicable and in connection with the processing of personal data collected in the territory and for residents of the state of California, your rights in relation to personal data will be treated in accordance with the requirements of the California Consumer Privacy Act, Cal. Code 1798.100 et seq. (CCPA).