

QVOX TECHNOLOGY SAS

Personal Data Processing and Protection Policy

Identification of the Data Controller

Company name	QVOX TECHNOLOGY SAS
Tax ID (NIT)	900.906.223-1
Domicile	Bogotá D.C., Colombia
Address	Carrera 49 D No. 91-84, Bogotá D.C.
Email	gerencia@qvox.com.co
Phone numbers	(+57) 318 837 2494 / (+57) 300 354 7094
Website	www.qvox.com.co
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1. Introduction and legal framework

QVOX TECHNOLOGY SAS (hereinafter “**QVOX**” or “the Company”), a commercial company identified with Tax ID (NIT) 900.906.223-1 and principal domicile in the city of Bogotá D.C., in its capacity as Data Controller of personal data, adopts this Personal Data Processing and Protection Policy in compliance with Articles 15 and 20 of the Political Constitution of Colombia, Statutory Law 1581 of 2012 and Decree 1377 of 2013, compiled in Chapter 25 of Sole Regulatory Decree 1074 of 2015, as well as any other rules that add to, amend or supplement them.

This Policy establishes the general guidelines governing the collection, storage, use, circulation, transmission, transfer and deletion of the personal data processed by QVOX, and informs Data Subjects about the purposes of the Processing, their rights and the mechanisms to exercise them.

Note on the nature of QVOX

QVOX develops technology, software, data analytics, artificial intelligence, cybersecurity, biometrics and digital identity solutions. By reason of its corporate purpose, QVOX may act both as **Data Controller** (with respect to the data of its employees, shareholders, suppliers, clients and visitors) and as **Data Processor**, when it processes personal data on behalf of its clients in the course of providing its services. In the latter case, the Processing is subject to the instructions of the respective Controller and to the corresponding data transmission agreement.

2. Identification of the Controller

The contact details of the Data Controller, before whom Data Subjects may exercise their rights, are as follows:

Company name	QVOX TECHNOLOGY SAS
Tax ID (NIT)	900.906.223-1
Principal domicile	Bogotá D.C., Colombia
Physical address	Carrera 49 D No. 91-84, Bogotá D.C.
Email	gerencia@qvox.com.co
Phone numbers	(+57) 318 837 2494 / (+57) 300 354 7094
Website	www.qvox.com.co
Responsible area	Administrative Area / Data Protection Officer

3. Purpose

To establish the general guidelines for the protection and Processing of personal data within QVOX, strengthening the trust between the Company and Data Subjects, informing the purposes and any transfers and transmissions to which their personal data are subject, and making known the mechanisms and means for the exercise of their rights.

4. Scope and field of application

This Policy applies to all databases and/or files, whether physical or digital, that include personal data subject to Processing by QVOX as Data Controller and, where applicable, to those that the Company processes as Data Processor on behalf of third parties. It applies to all officers, employees, contractors and third parties who, in the course of their duties or relationships with QVOX, access or process personal data.

5. Definitions

For the purposes of this Policy, in accordance with Article 3 of Law 1581 of 2012 and Article 3 of Decree 1377 of 2013 (compiled in Decree 1074 of 2015), the following definitions are adopted:

- **Authorization:** Prior, express and informed consent of the Data Subject to carry out the Processing of personal data.
- **Privacy notice:** Verbal or written communication generated by the Controller, addressed to the Data Subject, by which the latter is informed about the existence of the applicable Processing policies, how to access them and the purposes of the Processing.
- **Database:** Organized set of personal data subject to Processing.
- **Personal data:** Any information linked to or that may be associated with one or more specific or identifiable natural persons.
- **Public data:** Data that is not semi-private, private or sensitive. Public data includes, among others, data relating to civil status, profession or occupation and to a person's status as a merchant or public servant.
- **Semi-private data:** Data that is not of an intimate, reserved or public nature, and whose knowledge or disclosure may be of interest both to its holder and to a specific group of persons.
- **Private data:** Data that, by its intimate or reserved nature, is only relevant to the Data Subject.
- **Sensitive data:** Data that affects the privacy of the Data Subject or whose improper use may give rise to discrimination, such as data revealing racial or ethnic origin, political orientation, religious or philosophical convictions, membership of trade unions or social or human rights organizations, as well as data relating to health, sexual life and biometric data.
- **Biometric data:** Sensitive data derived from the physical, physiological or behavioral characteristics of a person that allow their identification or verification (for example, video surveillance images, fingerprint or face).
- **Data Processor:** Natural or legal person, public or private, that, by itself or in association with others, processes personal data on behalf of the Data Controller.
- **Data Controller:** Natural or legal person, public or private, that, by itself or in association with others, decides on the database and/or the Processing of the data.
- **Data Subject:** Natural person whose personal data are subject to Processing.
- **Processing:** Any operation or set of operations on personal data, such as collection, storage, use, circulation or deletion.

- **Transfer:** Occurs when the Controller and/or Processor, located in Colombia, sends the information or personal data to a recipient that is, in turn, a Data Controller and is located within or outside the country.
- **Transmission:** Processing of personal data that involves their communication within or outside the national territory when its purpose is the carrying out of Processing by the Processor on behalf of the Controller.
- **Habeas Data:** The right of every person to know, update and rectify the information collected about them in public or private databases.
- **Successor in title:** Person who, by succession or transfer, acquires the rights of another.

6. Guiding principles

In the Processing of personal data, QVOX shall apply the following guiding principles established in Law 1581 of 2012:

- **Principle of legality:** Processing is a regulated activity that is subject to the provisions of the law and the other rules that develop it.
- **Principle of purpose:** Processing must respond to a legitimate purpose in accordance with the Constitution and the law, which must be communicated to the Data Subject.
- **Principle of freedom:** Processing may only be carried out with the prior, express and informed consent of the Data Subject, except by legal or judicial mandate that replaces consent.
- **Principle of truthfulness or quality:** The information subject to Processing must be truthful, complete, accurate, up to date, verifiable and comprehensible; the Processing of partial, incomplete or misleading data is prohibited.
- **Principle of transparency:** The right of the Data Subject to obtain, at any time and without restrictions, information about the existence of data concerning them is guaranteed.
- **Principle of restricted access and circulation:** Processing is subject to the limits arising from the nature of the data; except for public information, data shall not be available on the Internet or other means of mass dissemination, unless access is technically controllable.
- **Principle of security:** Information is handled with the technical, human and administrative measures necessary to prevent its alteration, loss, unauthorized or fraudulent consultation, use or access.
- **Principle of confidentiality:** All persons involved in the Processing are obliged to guarantee the confidentiality of the information, even after their relationship with such tasks has ended.

7. Processing of sensitive data and data of minors

7.1. Sensitive data

The Processing of sensitive data is prohibited, except in the cases provided for in Article 6 of Law 1581 of 2012 (among others, when the Data Subject has given explicit authorization, when the Processing is necessary to safeguard a vital interest of the Data Subject, or when it refers to data

necessary for the recognition, exercise or defense of a right in judicial proceedings). When QVOX processes sensitive data, it will inform the Data Subject that they are not obliged to authorize such Processing and which data are of a sensitive nature. QVOX will adopt enhanced security and confidentiality measures for such data, which will only be used for the purposes expressly informed.

In particular, QVOX may process **biometric data** (for example, video surveillance images and, in the context of its technology services, identity verification data), which are of a sensitive nature and are subject to the measures and requirements set out in this section.

7.2. Data of children and adolescents

The Processing of personal data of children and adolescents is prohibited, except when it involves data of a public nature and when such Processing addresses and respects the best interests of the minor and their fundamental rights. QVOX does not directly process data of minors in the course of its commercial activity; however, when it collects data of the minor children of its employees (for example, for social security and payroll-tax affiliations), it will obtain the authorization of the minor's legal representative and will safeguard the best interests of children and adolescents.

8. Rights of Data Subjects

In accordance with Article 8 of Law 1581 of 2012, the Data Subject has the following rights:

- To know, update and rectify their personal data before the Data Controller or Data Processor.
- To request proof of the authorization granted to the Controller, except where it is expressly exempted as a requirement for the Processing.
- To be informed, upon request, of the use that has been made of their personal data.
- To file complaints with the Superintendence of Industry and Commerce for breaches of the law, once the inquiry or claim procedure before QVOX has been exhausted.
- To revoke the authorization and/or request the deletion of the data when the Processing does not respect the constitutional and legal principles, rights and guarantees.
- To access, free of charge, their personal data that have been subject to Processing.

These rights may be exercised by the Data Subject, their successors in title (proving such status), their representative or attorney-in-fact (proving the representation) and by whoever results from a stipulation in favor of another. The rights of minors shall be exercised by the persons authorized to represent them.

9. Authorization of the Data Subject and privacy notice

As a general rule, QVOX will collect the prior, express and informed authorization of the Data Subject for the Processing of their personal data, which may be obtained by any means that can be subsequently consulted and verified (physical, electronic, verbal or through unequivocal conduct). QVOX will keep proof of the authorization granted.

When data are collected through privacy notices or electronic means, QVOX will inform the Data Subject of, at a minimum, the identity and contact details of the Controller, the Processing to which the data will be subject and its purpose, the rights they hold and the means to access this Policy.

9.1. Events in which authorization is not required

In accordance with Article 10 of Law 1581 of 2012, the authorization of the Data Subject shall not be necessary in the case of:

- Information required by a public or administrative entity in the exercise of its legal functions or by court order.
- Data of a public nature.
- Cases of medical or health emergency.
- Processing of information authorized by law for historical, statistical or scientific purposes.
- Data related to the Civil Registry of persons.

10. Duties of QVOX

In its capacity as Data Controller, QVOX will comply with the duties established in Article 17 of Law 1581 of 2012, including:

- To guarantee the Data Subject, at all times, the full and effective exercise of the right of Habeas Data.
- To request and keep a copy of the respective authorization granted by the Data Subject.
- To duly inform the Data Subject of the purpose of the collection and the rights they hold.
- To keep the information under security conditions to prevent its alteration, loss, unauthorized or fraudulent consultation, use or access.
- To process inquiries and claims within the terms set out in the law.
- To adopt an internal manual of policies and procedures to guarantee compliance with the law and the handling of inquiries and claims.
- To inform the data protection authority when violations of the security codes occur and risks exist in the administration of the information.
- To comply with the instructions and requirements issued by the Superintendence of Industry and Commerce.

When QVOX acts as **Data Processor**, it will additionally comply with the duties of Article 18 of Law 1581 of 2012, processing the data solely in accordance with the instructions of the Controller, guaranteeing its security and confidentiality, and refraining from circulating or using the information for purposes other than those contracted.

11. Specific purposes by type of Data Subject

The databases managed by QVOX are classified as confidential and will only be disclosed with the express authorization of the Data Subject or when a competent authority so requests. The purposes by type of Data Subject are described below:

11.1. Employees

- To comply with the obligations imposed by Colombian labor law and with the orders issued by the competent authorities.
- To issue certifications relating to the Data Subject's relationship with the Company.
- To comply with the obligations regarding Occupational Health and Safety (SG-SST).
- To manage the duties performed by employees, disciplinary processes and welfare matters.
- To contact family members in cases of emergency.

Retention period – Employees

The information will not be subject to Processing for a period exceeding twenty (20) years from the termination of the employment relationship, unless legal or contractual circumstances require a different period.

11.2. Shareholders

- To enable the exercise of the duties and rights arising from the status of shareholder.
- To send invitations to events and, in general, to contact the shareholder.
- To issue certifications relating to their relationship with the Company.

Retention period – Shareholders

For as long as the person holds the status of shareholder and the additional time required by legal or contractual circumstances, in accordance with the Code of Commerce.

11.3. Clients and users

- To carry out actions in the pre-contractual, contractual and post-contractual stages.
- To provide, support and maintain the contracted technology services and solutions (software, licensing, analytics, cybersecurity, digital identity, among others).
- Billing, collection and compliance with tax and accounting obligations.
- To address requirements, warranties and support arising from the contract entered into.
- To verify compliance with the obligations of the parties.

- To carry out onboarding, loyalty and marketing activities for the Company's own services.

Retention period – Clients and users

For the duration of the relationship with the Company and the additional time required by legal or contractual circumstances.

11.4. Suppliers and contractors

- To send invitations to contract and to carry out pre-contractual, contractual and post-contractual actions.
- To verify suitability and competence, make payments and comply with tax obligations.
- To manage social security and occupational health and safety obligations where applicable.

Retention period – Suppliers

For the duration of the relationship with the Company and the additional time required by legal or contractual circumstances.

11.5. Visitors (access control)

- To ensure authorized entry to the premises and restrict unauthorized access.
- To guarantee security in monitored environments.

Retention period – Visitors

No longer than one (1) year from its collection, unless legal or contractual circumstances require a different period.

11.6. Video surveillance (biometric data)

- To guarantee security in the workplace and on the premises.
- To control the entry, stay and exit of employees, contractors and visitors.

QVOX will implement privacy notices in the areas where images are captured involving the Processing of personal data.

Retention period – Video surveillance

No longer than thirty (30) days from its collection, unless legal or contractual circumstances require a different period.

12. International transfer and transmission of data

QVOX may carry out international transmission of personal data to the extent that some of its databases or those of its clients are stored on servers located abroad, managed by third parties (for example, cloud services). To do so, in addition to informing the Data Subject and obtaining their authorization where applicable, QVOX will ensure that the operation is governed by a data transmission agreement that includes the requirements demanded by Law 1581 of 2012 and its implementing decrees.

In accordance with Title VIII of Law 1581 of 2012, the transfer of data to countries that do not provide adequate levels of protection is prohibited, except in the cases exempted by law (among others, express and unequivocal authorization of the Data Subject; transfers necessary for the performance of a contract between the Data Subject and the Controller; or transfers legally required for the safeguarding of the public interest or of a right in judicial proceedings). Transmissions between Controller and Processor so that the latter carries out the Processing on behalf of the former will not need to be reported to the Data Subject or require their consent, provided that a personal data transmission agreement exists.

13. Security measures and demonstrated accountability

In compliance with the principle of security (Article 4, literal g, of Law 1581 of 2012), QVOX has implemented reasonable and proportionate technical, human and administrative measures to protect personal data against its alteration, loss, unauthorized or fraudulent consultation, use or access, including:

- Restricted access control to information according to each user's duties and credential management.
- Encryption and/or protection of sensitive information and of transmission channels.
- Backup, recovery and security incident management procedures.
- Execution of transmission agreements and confidentiality clauses with processors and third parties.
- Staff training and disclosure of the consequences of non-compliance.

Within the framework of the principle of **demonstrated accountability**, QVOX adopts appropriate and verifiable measures to evidence compliance with the regulations, including the designation of a person responsible for handling petitions, inquiries and claims, the retention of authorizations, the attention to the rights of Data Subjects and, where mandatory, the registration and updating of its databases in the National Registry of Databases (RNBD) of the Superintendence of Industry and Commerce.

14. Handling of inquiries, claims and requests

The Data Subject, their successors in title, their representative or attorney-in-fact may exercise their rights by means of a communication addressed to the Administrative Area of QVOX, at the email address gerencia@qvox.com.co, or in writing at Carrera 49 D No. 91-84 in the city of Bogotá D.C.

14.1. Inquiries

Inquiries will be addressed within a maximum term of ten (10) business days from their receipt. When it is not possible to address them within that term, the interested party will be informed of the reasons for the delay and the new date on which the inquiry will be addressed, which in no case will exceed five (5) business days following the expiration of the first term.

14.2. Claims

The claim shall be submitted in writing with the identification of the Data Subject, the description of the facts, the address and the supporting documents. If the claim is incomplete, the interested party will be required, within the five (5) days following its receipt, to remedy the deficiencies; if two (2) months elapse without a response, it will be understood that the claim has been abandoned. Once the complete claim is received, the legend “claim in process” will be included in the database within the two (2) following business days. The claim will be addressed within a maximum term of fifteen (15) business days, extendable by eight (8) additional business days, informing the Data Subject.

14.3. Procedural requirement

The Data Subject or successor in title may only file a complaint with the Superintendence of Industry and Commerce once the inquiry or claim procedure directly before QVOX has been exhausted.

14.4. Revocation of authorization and/or deletion of data

The Data Subject may revoke the authorization and/or request the deletion of their data when there is no legal or contractual duty to remain in the database, when the data are no longer necessary for the purpose, or when the Processing does not comply with the regulations. The right of deletion is not absolute and QVOX may deny it in the cases provided for by law.

15. Term and amendment of the Policy

This Policy is effective as of June 1, 2026 and supersedes all previous versions. The databases managed by QVOX will be subject to Processing for the time necessary to fulfill the informed purposes and for as long as legal or contractual obligations justifying their retention subsist.

QVOX reserves the right to amend this Policy at any time. Any amendment will be communicated in a timely manner to Data Subjects through the usual means of contact. When the change is substantial and refers to the identification of the Controller or the purpose of the Processing, it will be communicated before its implementation and, where applicable, new authorization will be requested from the Data Subject.

Andrés Mauricio Bolívar Arias

Legal Representative
QVOX TECHNOLOGY SAS