

This document implements the General Policy for the Protection of Personal Data (the "**Policy**"), which will be mandatory for all employees, suppliers and clients of **FRESKBANA SA**. ("**FRESKBANA SA**"). The Policy will establish the guidelines and principles under which **FRESKBANA SA** will be governed in its relationships and processes in which personal data is processed.

1. Aim. -

1.1 General: FRESKBANA SA 's primary objective is to comply with the rights, principles, and obligations established in the Organic Law on Personal Data Protection ("LOPDP"), secondary regulations, and resolutions issued by the Data Protection Authority. For this reason, it is important to establish parameters for the protection of personal and sensitive information known as Personal Data or Information, in accordance with local legislation and FRESKBANA SA 's national and international guidelines, where applicable.

1.2 Specifics :

1.2.1 Establish the principles that will guide FRESKBANA SA in the handling of personal data of its clients, employees, and/or suppliers or third parties with whom it maintains a business relationship.

1.2.2 Establish guidelines for creating control mechanisms related to personal data.

1.2.3 Establish the main guidelines for contracting suppliers with a focus on personal data protection.

Establish guidelines for implementing technical, physical, and organizational security mechanisms to ensure the confidentiality and security of personal data.

2. Responsibility for data processing. -

FRESKBANA SA is responsible for the safekeeping and proper conservation of the recorded data; however, the responsibility for the accuracy and authenticity of the recorded data rests exclusively with the declarant when he or she provides all the information.

In the event of improper processing of Personal Data in the custody of FRESKBANA SA , the persons affected by false or inaccurate information, or information disseminated without the express authorization of the Data Subject, shall be entitled to the corresponding compensation, prior to exercising the respective legal action.

Under our criminal law, it is considered a violation of privacy when, without prior legal consent or authorization, personal data, data messages, voice, audio and video, postal objects, information contained in computer media, private or confidential communications of another person are accessed, intercepted, examined, retained, recorded, reproduced, disseminated, or published by any means.

It is the direct responsibility of FRESKBANA SA to create the personal data protection committee, whose main functions will be to ensure compliance with this policy, train staff, provide workshops to clients and suppliers, as well as appoint the Data Protection Officer, guaranteeing the exercise of the rights of the data subjects.

3. Scope of Application. -

- a. The General Policy for the Protection of Personal Data (" **The Policy** ") is directed to and is mandatory for all its clients, employees, suppliers, persons related to FRESKBANA SA (shareholders and management bodies) and companies related to the processing of the personal data of the owners.

4. Glossary of Terms. -

The definitions of the LOPDP are taken, especially the following:

- 4.1 Personal Data:** Data that identifies or makes a natural person identifiable, directly or indirectly. For example: name, ID card, address, email address, telephone number, marital status, health information, fingerprint, salary, assets, financial statements, among others.
- 4.2 Sensitive Data:** Data relating to: ethnicity, gender identity, cultural identity, religion, ideology, political affiliation, judicial history, immigration status, sexual orientation, health, biometric data, genetic data, and data whose improper processing may give rise to discrimination, violate or may violate fundamental rights and freedoms.
- 4.3 Data Custodian:** Role responsible for functionally ensuring the implementation of Data Governance. Process Owner: Term used to identify the person responsible for a process that must manage the correct execution of the processes under their charge and continuous improvement, in order to organize work practices, provide greater satisfaction to internal customers, and increase efficiency, with the support of all designated process participants.
- 4.4 Data Processor:** A natural or legal person, public or private, who, either alone or in association with others, processes Personal Data on behalf of the Data Controller (FRESKBANA SA), as an ally or supplier. In cases where the Data Controller does not act as the database manager, the data processor will be expressly identified.
- 4.5 Owner:** Natural person whose data is the subject of processing.
- 4.6 Processing:** Any operation or set of operations performed on personal data, whether by automated, partially automated or non-automated technical means, such as: collection, compilation, obtaining, recording, organization, structuring, conservation, custody, adaptation, modification, elimination, indexing, extraction, consultation, elaboration, use, possession, exploitation, distribution, assignment, communication or transfer, or any other form of enabling access, comparison, interconnection, restriction, deletion, destruction and, in general, any use of personal data.

Additional definitions used in this Policy:

- 4.7 Authorization:** Legal basis that allows companies or individuals responsible for or in charge of managing information to use your personal data.
- 4.8 Database:** Organized set of personal data.
- 4.9 Natural Person:** Individuals capable of exercising rights and incurring obligations.

5. Guidelines for data collection. -

FRESKBANA SA must collect, manage, archive and use Data from its employees or collaborators, suppliers, contractors, providers, strategic partners and clients. For this reason, it is important to obtain the express authorization of the Data Subject before obtaining Personal Data.

5.1 Data Subject Authorization for Collection, Use and Transfer of Data

Data Subjects must provide express and voluntary authorization for the processing of their Personal Data prior to providing personal information. FRESKBANA SA may not use information for any purpose without the prior authorization of the Data Subject.

Authorization for the processing of personal data is the express and voluntary consent given by any person so that companies or individuals responsible for processing information can use their personal data.

The forms that FRESKBANA SA prepares to obtain said authorization must contemplate in their text the rights of the Owner mentioned in the respective point of this Policy.

The authorization of the owner of the information will not be necessary in the following cases:

- I. Order from competent authority.
- II. In cases where the information is found in publicly accessible databases.

5.2 Other forms of data collection

The Data may be explicitly provided to FRESKBANA SA through entry or link forms, collected personally through its employees, service providers or commercial representatives, collected implicitly from market analysis operations, target groups, acquisition of products or services offered by FRESKBANA SA . or from the behavior of the Data Subjects such as complaints, requests for quotations, surveys, proposals, offers, job applications, participation in projects, programs, events, etc. However, for these data to be used for other purposes or transferred, the express authorization of the Holder is required.

6. Principles of Personal Data Processing. -

- a. The principles governing this policy and the processing of personal data by FRESKBANA SA are as follows:

I. Loyalty

1. Personal data will be collected fairly and lawfully for one or more specific purposes communicated to the data subject. FRESKBANA SA may use any applicable legal basis for processing personal data.
2. To the extent possible, personal data considered sensitive, such as ethnicity, sexual orientation, philosophical and political beliefs, or gender ideology, will not be processed. Should FRESKBANA SA require sensitive data, it will do so only when required by law or with the express authorization of the data subject. In the case of health data, especially but not limited to employee data, it will be processed in accordance with the provisions of the applicable labor regulations.
3. For the collection or compilation of personal data, the data subject will be informed of the type of data, retention period, processing basis, and all requirements established in the LOPDP.

4. The data subject shall be responsible for providing accurate and correct data. FRESKBANA SA may update or request that such data be updated.
5. FRESKBANA SA will not acquire personal data or databases that do not have the corresponding legitimacy mechanisms, nor will it transfer data to third-party recipients without the corresponding authorization or legitimizing basis.

II. Transparency

1. The processing of personal data will be transparent to the data subject. Thus, FRESKBANA SA will inform and communicate to the data subjects in a clear and simple manner everything the data subject needs to know regarding the processing of their personal data. FRESKBANA SA will inform the data subject through the policy and documents posted in the offices, warehouses, websites, and/or locations managed and owned by FRESKBANA SA , as well as through campaigns, contracts, clauses, and documents prepared by FRESKBANA SA for this purpose.
2. FRESKBANA SA guarantees that personal data subjects can exercise their rights, providing them with various channels through which they can submit the corresponding requests.

III. Purpose

1. FRESKBANA SA will inform the data subject of the purpose(s) for which the personal data were collected and will be processed. The purposes will be determined and specified in accordance with the legal basis for collecting the data.

IV. Minimization and Proportionality

1. FRESKBANA SA will process the personal data necessary for the purposes disclosed to the data subject. Excessive data or data not necessary for a previously established purpose will not be collected. If excessive data is collected, FRESKBANA SA will delete or remove it from its databases.

V. Confidentiality

1. FRESKBANA SA will make every effort to ensure the confidentiality of personal data. FRESKBANA SA will adapt its technology and processes, technically and economically feasible, to ensure the confidentiality, availability, and integrity of personal data, limiting, as far as possible, access to personal data by third parties without legal authority. FRESKBANA SA will not transfer personal data to third-party recipients without authorization or a corresponding legal basis.

VI. Security

1. FRESKBANA SA will adopt the necessary security measures to guarantee the confidentiality of personal data, taking into account the type of personal data to be processed and ensuring that the measures are technically and economically feasible.
2. FRESKBANA SA suppliers and customers with whom personal data is shared must demonstrate the implementation of security measures that guarantee the protection of personal data.

VII. Conservation

1. FRESKBANA SA will retain personal data in accordance with the purposes for which it was provided by the data subject or as established in the various legal bases. Once the retention period has expired, FRESKBANA SA will delete or erase the data from its systems.
2. FRESKBANA SA may anonymize the data if deemed necessary. The anonymized data may be freely used by FRESKBANA SA .

VIII. Proactive and Demonstrated Responsibility

1. FRESKBANA SA will obtain the necessary and appropriate verification means to demonstrate compliance with the Personal Data Protection Act. If necessary or at FRESKBANA SA 's discretion , the corresponding certifications will be obtained.
2. In accordance with the corresponding regulations, FRESKBANA SA will have a data protection officer (" DPO "), who will be responsible for generating the personal data compliance program, obtaining the corresponding means of verification, obtaining the necessary certifications and communicating with the Data Protection Authority.

IX. Data sensitivity

1. The Data Custodian will be responsible for defining the data that may be classified as "Sensitive Data" within the legal basis, considering the following summary:

Data Type	Description	Preventive measure
Personal data	Data that identifies or makes identifiable a natural person, directly or indirectly, currently or in the future. This includes harmless data, metadata, or data fragments that identify or make identifiable a human being.	In addition to sharing this data through secure, encrypted means, it is suggested that direct identifiers such as ID and full name (first name only, last name only, for example) be anonymized when sharing with third parties (providing only the data that is strictly necessary).

Personal credit data	Data that integrates the credit behavior (card), financial behavior (account), and payment capacity of natural persons.	If we have this type of information, it should only come from financial institutions and/or credit bureaus or authorized mechanisms. When sharing, we must avoid sharing data that allows us to reconstruct a natural person's "payment capacity," as well as transferring data that facilitates online transactions (e.g., CVC).
Sensitive data	Data relating to ethnicity, gender identity, cultural identity, religion, ideology, political affiliation, legal history, immigration status, sexual orientation, health, biometric data, generic data, and any other data whose improper handling may give rise to discrimination, violate or may violate human rights or the dignity and integrity of individuals.	In addition to sharing this data through secure, encrypted means, it is suggested that direct identifiers such as ID and full name (first name only, last name only, for example) be anonymized when sharing with third parties (providing only the data that is strictly necessary).
Special categories	Data on children and adolescents, and on people with disabilities and their substitutes.	This data should not be included in organizational repositories, except for compliance with obligations arising from employment and social security relationships.

7. Rights of Personal Data Subjects. -

- a. The procedure for addressing the rights and requests of data subjects will be established by the Personal Data Subject Rights Policy and any other document issued by FRESKBANA SA for this purpose. In any case, the forms used by FRESKBANA SA to record the Data Subjects' Authorization must reflect their rights under the LOPDP (Personal Data Protection Act). Data Subjects may enjoy the following rights, subject to and in accordance with applicable law:
 - I. **Transparency of information:** the right to be informed in accordance with the principles of loyalty and transparency on all aspects indicated in Article 12 of the LOPDP.
 - II. **Access:** right to:
 - Obtain confirmation as to whether or not your Personal Data is being processed;
 - Receive a copy of all your Personal Data being processed by FRESKBANA SA , except for the exceptions defined by relevant legislation (for example, confidential business information, or information that would unduly infringe the privacy rights of a third party);
 - Request information about the sharing of your Personal Data with other organizations.
 - Details of the institutional policies and procedures for the protection of personal data privacy; and,

- Online processing service for inquiries and complaints regarding personal data.
 - III. **Rectification and updating:** the right to obtain from the data controller the rectification and updating of your inaccurate or incomplete personal data.
 - IV. **Deletion:** the right to have your personal data deleted in the cases determined by Article 15 of the LOPDP.
 - V. **Objection:** the right to object to the processing of your personal data in the particular circumstances specified in Article 16 of the FRESKBANA SA Data Protection Act. FRESKBANA SA must stop processing such data when an objection is lodged, unless there is a specific reason why the objection is not valid.
 - VI. **Portability:** The data subject has the right to receive their personal data from the data controller in a compatible, updated, structured, common, interoperable, and machine-readable format, preserving their characteristics; or to transmit them to other data controllers. The data subject has the right to select which information may be shared with third parties.
 - VII. **Suspension:** the right to obtain from the data controller the suspension of data processing when any of the conditions of Article 19 of the LOPDP are met.
 - VIII. **Request for review of decisions made solely on the basis of automated processing:** the right to object, request explanations, and request human review of decisions based solely on automated processing of data that affect your interests.

8. Processing of personal data stored in databases

8.1 FRESKBANA SA will only use, process, and distribute the personal data and other information of Data Subjects for the purposes described and for the processing authorized in this Policy or by applicable law.

8.2 In addition to what is mentioned in other clauses, the Owner expressly authorizes FRESKBANA SA to collect, use and distribute his/her personal data and other information for the following purposes and in the following circumstances:

- 8.2.1** To establish communication between FRESKBANA SA and the Data Subjects, for any purpose related to the purposes set forth in this Policy, whether through calls, text messages, WhatsApp®, emails and/or physical communications.
- 8.2.2** Carry out or implement the acquisition or offer of products or services by FRESKBANA SA .
- 8.2.3** Audit, study and analyze the information in the Database to design commercial strategies and increase and/or improve the products and services offered by FRESKBANA SA
- 8.2.4** Combine personal data with information obtained from other partners or companies or send it to them to implement joint business strategies.
- 8.2.5** Audit, study, and analyze information in the database to design supply strategies.
- 8.2.6** Audit, study, analyze, and use information from the Database to design, implement, and develop programs, projects, and events.
- 8.2.7** Audit, study, analyze, and use information from the Database to disseminate policies, projects, programs, results, and organizational changes.

- 8.2.8** Provide the information and personal data of the Holders to the subsidiaries, affiliates or affiliates of FRESKBANA SA, strategic allies or other companies or persons that FRESKBANA SA commissions to process the information and fulfill the purposes described in this Policy.
- 8.2.9** Conduct financial, legal, commercial, and security risk assessments.
- 8.2.10** When the information must be disclosed to comply with laws, regulations or legal processes, to ensure compliance with the terms and conditions, to stop or prevent fraud, attacks on the security of FRESKBANA SA, prevent technical problems or protect the rights of others as required by the terms and conditions or the law.
- 8.2.11** Consult, store and use financial information obtained from third-party database administrators, with prior authorization from the Owner for such consultation.
- 8.2.12** Others described in this Policy or applicable Ecuadorian legislation.
- 8.2.13** Information that is not susceptible to processing:
- 8.2.14** Minors: FRESKBANA SA will not collect personal data related to children and adolescents, except if it is information of dependents related to the fulfillment of obligations derived from the employment relationship and social security, corporate social responsibility or when said minors are beneficiaries of social responsibility projects carried out in communities close to the operations of FRESKBANA SA reserves the right to eliminate or delete any information related to children and adolescents in the event that a personal data owner has shared information about children and adolescents.

9 International transfer of personal data

- 9.1** In the event of an international data transfer, FRESKBANA SA will ensure that it is made to jurisdictions that safeguard the protection and privacy of personal data. FRESKBANA SA will not disclose such data to third parties, except when necessary to manage FRESKBANA SA 's processes and services. In particular, only third parties to whom FRESKBANA SA has entrusted a service provision will have access to personal data. Furthermore, FRESKBANA SA may disclose your data to branches and also for the purpose of storing information in local and/or foreign databases. In cases where such communications involve an international transfer, FRESKBANA SA will ensure that they are made to jurisdictions that safeguard the protection and privacy of personal data.
- 9.2** In the event that data transfers are required to third countries that may be located in jurisdictions that do not necessarily meet the same protection standards as Ecuador, FRESKBANA SA will adopt the necessary measures to ensure adequate protection of personal data in accordance with the LOPDP.
- 9.3** Recipients will be subject to the same obligations and security measures, both technical and legal, described in the LOPDP, secondary regulations, and resolutions issued by the Data Protection Authority.

10 Hiring Suppliers

- 10.1** FRESKBANA SA suppliers must process personal data to which they have access only in accordance with the documented instructions of FRESKBANA SA.

- 10.2** All suppliers that handle personal data provided by FRESKBANA SA must have adequate measures in place to ensure the confidentiality and security of such personal data. This includes, but is not limited to, establishing, implementing, and maintaining an information security program that includes policies and procedures to protect and keep personal data secure in accordance with industry best practices and as required by the LOPDP (Spanish Data Protection Act). Specifically, FRESKBANA SA will verify that the following are in place: a data protection policy, an information security policy, certifications (at FRESKBANA SA 's discretion), a data protection officer or a data controller within the organization, among others.
- 10.3** FRESKBANA SA suppliers that handle sensitive data, and those determined by the Legal Department, must sign a Data Processing Agreement (" **DPA** "), which will establish the conditions for the processing of personal data, as well as the technical measures to be adopted. If a DPA is not signed, provisions regarding the handling of personal data must be incorporated into the framework contract, statement of work, purchase orders, or any other document that verifies the relationship with the supplier. Any of the aforementioned documents must establish, at a minimum, the following: the object and duration of the processing, the nature and purpose thereof, the type of personal data to be used, the data subjects, as well as the obligations and rights of FRESKBANA SA.
- 10.4** FRESKBANA SA may not enter into service contracts that include or involve personal data unless the provider (as the data processor) has the appropriate technical, physical, legal, and organizational measures in place, and unless the provider has signed a DPA or a document specifying obligations regarding the protection of personal data.
- 10.5** If the Supplier intends to use a subcontractor to process Personal Data, it shall: (i) notify FRESKBANA SA before subcontracting services or making any changes regarding the addition or replacement of subcontractors; (ii) document the nature and scope of FRESKBANA SA 's Personal Data subcontracted by the subcontractors, ensuring that the information collected is necessary for the performance of the activity; (ii) process Personal Data in accordance with FRESKBANA SA 's guidelines ; and, (iv) limit the processing of FRESKBANA SA 's Personal Data by the subcontractor to the purposes necessary to fulfill the Supplier's contract with FRESKBANA SA.

11 Evaluation and Control

- 11.1** FRESKBANA SA will conduct evaluation and monitoring processes regarding compliance with the Data Protection Law and the technical security measures involved.
- 11.2** FRESKBANA SA may request verification measures or conduct checks on suppliers who handle personal data. This will be established in the DPA signed with the supplier or in the service provision contract.

12 Training

- 12.1** FRESKBANA SA will conduct annual training for all its staff on the principles, rights, and obligations established in the LOPDP. FRESKBANA SA will periodically adopt appropriate training and awareness-raising measures to ensure that all

employees are familiar with this Policy and the personal data protection processes, and can perform their duties in accordance with them.

13 Relationship with the Supervisory Authority

13.1 FRESKBANA SA will maintain a fluid and compliant dialogue with the Data Protection Authority. FRESKBANA SA may share information and personal data in accordance with the requirements of the Data Protection Authority.

13.2 If necessary, FRESKBANA SA will appoint a Data Protection Officer who will be responsible for communicating and submitting the information required by the Data Protection Authority.

14 Personal data security

General considerations

14.1 FRESKBANA SA must process data throughout its entire lifecycle, taking into account the following actions:

14.2 Storage:

- a. Antivirus protection (endpoint)
- b. Information backup considerations
- c. Information storage process

14.3 Elimination

- a. Deletion that includes secure deletion
- b. Define processes for the deletion of information, which will be established in the Personal Data Storage, Processing, and Deletion Policy.

15 References to other documents

- a. ISO 9001:2015 Quality Management System Standard
- b. ISO 20000-1:2018 Service Management System Standard
- c. ISO 27001:2013 Information Security Standard
- d. Process of Transformation to the Data Protection Culture.
- e. INTEDYA Personal Data Protection Implementation Program.

16 Approval and Entry into Force

16.1 This Policy will be communicated to all related parties, who must comply with it in accordance with the Scope of Application. The Policy will be reviewed periodically in accordance with FRESKBANA SA 's business activities and strategic objectives. Additionally, the Policy may be revised and adapted in accordance with legal or regulatory changes or resolutions of the Competent Authority.

