



NOTICE OF PRIVACY AND PROCESSING OF PERSONAL DATA GBM

GBM is committed to protecting the personal data and privacy of its customers, employees, applicants, professionals, suppliers, and third parties. In compliance with current regulations on the processing of personal data in Central America, the Dominican Republic, and Colombia, as well as the European Union's General Data Protection Regulation, we provide you with the following Privacy Notice:

The owners of personal data understand that this data is necessary to establish the different relationships between the owner and GBM, depending on its nature and for the fulfillment of the various purposes. The provision of personal data is entirely voluntary for the user. Failure to provide certain data or answers to questions that may be asked during the registration process or in the electronic forms presented to the user may make it impossible to access the services for which the personal data has been requested. In such cases, GBM will inform the user of the mandatory and/or necessary nature of the provision of data for the operation of the service.

Please be advised that personal data provided by customers, suppliers, employees, intermediaries, applicants, collaborators, and other interested parties will be processed in compliance with the aforementioned special regulations, as well as with GBM's Personal Data Processing Policy, which can be accessed in the Privacy Policies section by clicking on the following link: <https://www.gbm.net/politicas-de-privacidad/>

The party responsible for processing your personal data, depending on each circumstance, will be:

- General Business Machines Colombia S.A.S.
- GBM de Costa Rica, S.A.
- G.B.M. de Nicaragua, S.A.
- GBM de Panamá, S.A.
- GBM de El Salvador, S.A. de C.V.
- GBM de Honduras, S.A.
- GBM de Guatemala, S.A.
- GBM Dominicana, S.A.

Your personal information will be used, depending on the type of information, owner, and your informed consent, for the following purposes:

- a. To inform you about our promotions, offers, news, products, and services, partnerships, contests, current and future content related to events, contests, promotional activities, and other commercial purposes directly or indirectly related to our business.
- b. To inform you about new products or services related to those contracted or purchased, or changes thereto.
- c. To comply with obligations contracted with our customers, suppliers, collaborators, and applicants who are owners of personal data.
- d. Evaluate service quality.
- e. Conduct internal studies on consumer habits and statistical studies to enable the design of improvements to products and/or services provided.
- f. Facilitate the correct execution of purchases and provision of contracted services.



- g. Manage basic administrative tasks.
- h. Human Capital Management.
- i. Data necessary for access to GBM facilities.
- j. Comply with processes before government entities due to official requirements or actions by GBM for legal or internal compliance in the interest of GBM.
- k. Complying with processes before government entities of interest to employees for legal compliance whenever there are requirements or orders from the corresponding authority, or at the request of the employee.
- l. In GBM's customer compliance and audit processes. This will occur in cases where any customer requests information from employees related to the contracted service.

Personal data subject to the above purposes that are strictly commercial will be treated strictly in accordance with the regulations; all other data will be treated in compliance with the basic regulatory principles of personal data processing. To carry out the aforementioned purposes, we collect only personal data provided directly by you as the owner of such data, as well as information that is in the public domain. The owner expressly authorizes GBM to use the email addresses, data sent, and/or generated by virtue of the services provided by GBM.

The user declares that all the information provided during the registration process is true and correct, and undertakes to notify GBM of any changes thereto. In the event that the user provides third-party data during the registration process or use of the application, GBM shall not be responsible for compliance with the principles of information and consent, and it shall therefore be the user's responsibility to ensure that they have previously informed and obtained the consent of the owner of such data to communicate it.

In order to ensure the efficient and effective processing of personal data, data subjects must give their consent for the personal data they have provided to GBM to be transferred and/or transmitted, locally or internationally, to (i) any member of the GBM corporate group and/or related companies, affiliates, subsidiaries, parent companies, or subsidiaries of GBM (ii) third-party providers of personal data processing services. GBM will require those who transfer and/or transmit your personal data to comply with standards, national and international regulations, as well as internal confidentiality and security policies.

GBM may be required to disclose personal data in response to duly constituted legal requests from government authorities, including compliance with national security or law enforcement requirements.

The data provided will be included in one of the databases owned by GBM. Our databases seek to keep information up to date so that the relationship with our customers, collaborators, applicants, suppliers, contractors, and/or other interested third parties develops appropriately. The processing of personal data is not limited to the events described above, but will be carried out in general for the development of GBM's corporate purpose and to comply with the corresponding obligations, and will be processed for as long as the relationship that gives rise to this processing lasts.

Your personal data will be kept strictly confidential in order to prevent unauthorized access. GBM has physical, technical, and administrative security measures in place in accordance with industry standards and as a regional leader in technological innovation. GBM will not disclose information about your visits to its platforms to third parties.



If you, as the owner of the personal data, have any questions or concerns about the processing described above carried out by GBM, please send an email to support@gbm.net, addressed to the Service Desk.

Under the terms and conditions established in GBM's Personal Data Processing Policy, and in accordance with the principles of truthfulness and good faith, you may use the technological tool implemented by GBM to:

- Consult, correct, update, and/or delete your personal data. Deletion will be restricted to compliance with obligations to government entities.
- Access your Personal Data that has been processed free of charge.
- Object to the processing of personal data provided that it does not interfere with the fulfillment of the Company's corporate purpose.
- Exercise your right to the portability of your personal data.
- Revoke the consent granted at any time, in accordance with the terms established by applicable regulations.
- Refrain from answering questions about Sensitive Data or Data on children and adolescents. In this case, the Data Subjects, or their respective legal representatives, are informed that they are not obliged to provide authorization for the processing of Sensitive Data or Data on children and adolescents.

These procedures regarding the management of the personal data provided may be carried out using the technological tool implemented by GBM so that you can exercise these rights, by sending an email to the Service Desk at the following email address: support@gbm.net

In addition to the procedure described above, you may limit the use or disclosure of your personal data by sending an email to support@gbm.net, in order to opt out of receiving promotional information about our services, in

GBM may modify and/or update this privacy notice unilaterally, informing you of any modification or update through our website: <http://www.gbm.net>.

It is important to mention that exercising your rights is not a prerequisite for exercising any other right, nor does it prevent you from exercising any other right. Any modification to this notice will be notified to you through the means available to GBM for this purpose. In the event that sensitive data is to be collected, responses to questions about this type of data will be optional, except where strictly necessary.

In the event of security breaches involving the leakage of personal data, GBM will inform you as the owner of the personal data subject to the processing described herein. The internal ticket number for the Information Security Incident will be provided, along with the actions planned to mitigate the breach.

Where applicable, each Customer will have a username and password to access the platform. GBM will provide a potential user with a request form to obtain access and a password upon request. The user acknowledges and agrees that once this information has been provided, they are responsible for its use, releasing GBM from any liability for such use.

Upon receiving this privacy notice, you, as the Owner of Personal Data, declare that you have carefully read, understand, and accept all of the terms herein, as well as the contents of GBM's Privacy Policy and its scope; and



therefore express your consent to the processing of your personal data provided to GBM in accordance with this Privacy Notice and the Privacy Policy, as well as your responsibilities in relation to access to GBM platforms.