

 GEOTRANSPORT S.A. <small>INTERNATIONAL FREIGHT FORWARDER AGENCIA INTERNACIONAL DE CARGA</small>	POLÍTICA DE PRIVACIDAD Y PROTECCIÓN DE DATOS PERSONALES	Código	GEO-PPDP-01
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		Vigente desde	02/05/2023

Privacy Policy and Personal Data Protection of GEOTRANSPORT S.A.

For the operation, design, development, and execution of its services, GEOTRANSPORT S.A. implements the Privacy and Personal Data Protection Policy (the Policy), which will be mandatory for all shareholders, professionals, employees, suppliers, and clients.

The Policy will establish the guidelines and principles under which the company GEOTRANSPORT S.A. will operate in its relationships and processes in which personal data is processed under the Constitution of Ecuador, the Personal Data Protection Law, its Regulation, and other relevant normative provisions.

OBJECTIVE: Through the Privacy and Personal Data Protection Policy, GEOTRANSPORT S.A. complies with current regulations in Ecuador and establishes parameters and guidelines for the protection of personal and sensitive information known as personal data.

SCOPE OF APPLICATION - RECIPIENTS: The Privacy and Personal Data Protection Policy is directed and is mandatory for all employees, clients, suppliers, individuals related to GEOTRANSPORT S.A. (shareholders and governing bodies), and related companies that provide direct or indirect services to the company in the processing of personal data of the owners.

GUIDELINES REGARDING DATA COLLECTION: In the performance of its commercial activities, GEOTRANSPORT S.A. must collect, manage, archive, and use personal data of its shareholders, employees or collaborators, suppliers, contractors, and clients; therefore, it is important that prior to obtaining such data, it has the express authorization of its owner.

The owners of personal data must give prior to the delivery of personal information, express and voluntarily authorization for the processing of their Personal Data. GEOTRANSPORT S.A. cannot use, for any purpose, information that has not been duly authorized by its owner.

The authorization for the processing of Personal Data is the express and voluntary consent that any natural person gives so that the company or persons responsible for processing the information can use their personal data for the purpose that was foreseen and informed to the owner.

The authorization of the information owner will not be necessary when there are: i. data collected from publicly accessible sources; ii. when the processing responds to the free and legitimate acceptance of a legal relationship between the data controller and the owner, whose development, compliance, and control necessarily involve the connection of said processing with a database; iii. when personal data must be provided to administrative or judicial authorities under requests and orders covered by competences granted in the current regulations; iv. when the communication of personal data relating to health is necessary to solve an emergency involving the vital interests of the owner and

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they are unable to give their consent; and, v. when the communication of personal data relating to health is necessary for conducting epidemiological studies of public interest, complying with international standards in human rights matters, and at least with the criteria of legality, proportionality, and necessity.

Here are the specific aspects of the Privacy and Personal Data Protection Policy.

1. RESPONSIBLE FOR THE TREATMENT OF PERSONAL DATA

GEOTRANSPORT S.A. is responsible for the treatment of personal data, which will be responsible for collecting, storing, and processing personal data in accordance with the provisions of the Organic Law on Personal Data Protection of Ecuador (hereinafter LOPDP), its Regulations and other applicable regulations.

2. PERSON IN CHARGE OF THE TREATMENT OF PERSONAL DATA

It is the natural or legal person, public or private, public authority, or other body that, alone or jointly with others, processes personal data on behalf and on behalf of GEOTRANSPORT S.A., which is responsible for the processing of personal data.

The processing of personal data carried out by the processor must be regulated by a contract, which clearly and precisely establishes that the processor of personal data will only process them in accordance with the instructions of the controller and will not use them for purposes other than those indicated in the contract, nor will transfer or communicate them, not even for their retention to other persons.

Once the contractual provision has been fulfilled, personal data must be destroyed or returned to the person responsible for the processing of personal data under the supervision of the Personal Data Protection Authority.

3. RIGHTS OF DATA SUBJECTS

The Organic Law on Personal Data Protection grants rights to data subjects, for which we guarantee channels to exercise such rights. Without prejudice to the provisions of the LOPDP, the rights are:

- 1) Right to information: be informed about the personal data that the company has, how and why we process them, the time we will keep them, among other matters regulated by the law.
- 2) Right of access: know and obtain, free of charge, from GEOTRANSPORT S.A. access to all their personal data.
- 3) Right to rectification and updating: rectification and updating of any of their personal data if they are incomplete or inaccurate.
- 4) Right to deletion: deletion of personal data in the situations provided by the law.
- 5) Right to object: object or refuse the processing of personal data for direct marketing purposes or in other cases detailed in the law.

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6) Right to data portability: request personal data in a compatible format or transfer them to other controllers.

7) Right to suspension of processing: request the temporary or definitive suspension of the processing of all or part of personal data when the conditions detailed in the law are met.

8) Right not to be subject to decisions based on automated assessments: without prejudice to the provisions of the law, the person who provides their personal data to GEOTRANSPORT S.A. has the right not to be subject to decisions based on automated assessments that affect their rights.

To exercise these rights or revoke consent, which can be done at any time, you can contact GEOTRANSPORT S.A. in the manner provided in this privacy notice; as well as with the personal data protection officer of the company.

4. PROCESS TO MAKE EFFECTIVE THE RIGHTS OF THE HOLDER

To make effective the rights protected in the Organic Law on Personal Data Protection, update information, rectify, manage consents or preferences, even the revocation of consent, GEOTRANSPORT S.A. has made available the email address protecciondatos@geotransport-sa.com.

5. RIGHT TO INFORMATION

The data subject has the right to be informed in accordance with the principles of loyalty and transparency by any means, about:

- 1) The purposes of the processing;
- 2) The legal basis for the processing;
- 3) Types of processing;
- 4) Storage time;
- 5) The existence of a database containing their personal data;
- 6) The origin of personal data when not obtained directly from the data subject;
- 7) Other purposes and further processing;
- 8) Identity and contact details of the person responsible for the processing of personal data, which will include: address of the legal domicile, telephone number, and email;
- 9) When necessary, identity and contact details of the personal data protection officer, which will include: home address, telephone number, and email;
- 10) The transfers or communications, national or international, of personal data that it intends to make, including the recipients and their classes, as well as the purposes that motivate these transfers and the protection guarantees established;
- 11) The consequences for the data subject of their provision or refusal to provide data;
- 12) The effect of providing incorrect or inaccurate personal data;
- 13) The possibility of withdrawing consent;
- 14) The existence and the way in which access, deletion, rectification and updating rights can be exercised, opposition, annulment, limitation of processing and not be subject to a decision based solely on automated assessments;
- 15) The mechanisms for exercising your right to portability, when requested by the data subject;

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- 16) Where and how to make complaints to the person responsible for the processing of personal data and the Personal Data Protection Authority, and;
- 17) The existence of automated assessments and decisions, including profiling.

In cases where data is obtained directly from the data subject, the information must be communicated prior to this, that is, at the time of the collection of personal data.

PERSONAL DATA PROCESSED

To achieve the purposes described, GEOTRANSPORT S.A. processes personal data electronically through its systems, communication channels, contacts, and computer platforms, both partially automated and non-automated. It collects, compiles, obtains, records, organizes, structures, preserves, maintains, adapts, modifies, deletes, indexes, extracts, consults, processes, uses, exploits, sessions, enables, distributes, communicates, transfers, compares, interconnects, limits, deletes, blocks, and destroys the following personal data:

- 1) Special categories of personal data (sensitive, of children, adolescents, individuals with disabilities and their legal representatives, health-related, credit-related, and data of deceased individuals).
- 2) Gender data when required by current regulations for updating personal data of clients and collaborators; health data when requested by current regulations for managing the work relationship, preventing occupational risks, promoting public and private social benefits, and fostering occupational health; and biometric data, in a legitimate, controlled, and duly informed context, for tracking the workday of collaborators and for identifying, authenticating, and updating personal data of clients in channels and applications.
- 3) Identity and identification data including passwords and signatures. Contact and communication data.
- 4) Demographic data.
- 5) Product and service data. Transactions of goods and services.
- 6) Generated, transactional, and statistical data. Employment details.
- 7) Social circumstances. Academics and professionals.
- 8) Economic, financial, and insurance data including credit data. Commercial information and references.
- 9) Traffic and location data.

WHAT DO WE USE YOUR PERSONAL DATA FOR?

I. DATA OF COLLABORATORS AND POTENTIAL COLLABORATORS. (HUMAN RESOURCES DEPARTMENT)

- 1) For administrative processes of recruitment and/or selection and/or employment incorporation;
- 2) Payroll management and worker benefits;
- 3) Induction and training management;
- 4) Performance evaluation and work environment assessment;
- 5) Development of career plans and worker promotion;

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- 6) Prevention of money laundering and terrorism financing;
- 7) Occupational health and safety;
- 8) Compliance with legal, contractual, and regulatory obligations applicable to GEOTRANSPORT S.A.

II. DATA OF SUPPLIERS AND POTENTIAL SUPPLIERS. (FINANCIAL ADMINISTRATIVE DEPARTMENT)

- 1) Selection of suppliers registered in the company's supplier registration database (Supplier Registration Form).
- 2) Selection of new suppliers.
- 3) Periodic evaluation of suppliers.
- 4) Updating information of suppliers registered in the company's database through electronic means.
- 5) Request for information and/or documents from suppliers.
- 6) Payment processing by the financial department.
- 7) Generation of purchase requests for goods and/or services from each area of the company such as logistics, production, sales, accounting, finance, general management.

III. DATA OF OUR CUSTOMERS AND POTENTIAL CUSTOMERS. (COMMERCIAL/ADMINISTRATIVE/OPERATIVE DEPARTMENTS)

- 1) Registration of personal information of new clients in GEOTRANSPORT S.A.'s database.
- 2) Identification, authentication, and updating of personal data, to validate the accuracy of information provided by former clients, by consulting and/or storing information from any source such as public records, credit bureaus, etc.
- 3) Approval of direct credits.
- 4) Customer service through emails, social media, apps, chats, and phone calls.
- 5) Verification of profile, payment capacity, compliance with obligations, and/or financial solvency of clients through access to credit information systems, credit bureaus, and other entities prior to contracting any product, with explicit authorization and for the duration of the contractual relationship and communication of personal data.
- 6) Operational processes of the company such as accounting, billing, collections, commercialization of products, and audits.
- 7) Legal management for judicial, extrajudicial, and/or administrative procedures.
- 8) Collections and collections through company sales representatives.
- 9) **1. SUBJECTS MAINTAINING A RELATIONSHIP WITH GEOTRANSPORT S.A. AND THEIR PERSONAL DATA WILL BE PROTECTED**

All workers (employees, family members, and potential employees in the selection process), suppliers, customers, potential customers, shareholders, operational staff, and in general those who have a commercial and/or civil relationship with GEOTRANSPORT S.A., must treat the personal data they have access to only in accordance with the documented instructions provided by GEOTRANSPORT S.A.

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All subjects mentioned in the previous paragraph who handle personal data provided by GEOTRANSPORT S.A. must have appropriate measures in place to ensure the confidentiality and security of personal data, including, but not limited to, establishing, implementing, and maintaining an information security program that includes policies and procedures to protect and securely maintain personal data in accordance with industry best practices and as required by the LOPDP and its regulations.

For this purpose, depending on their civil, labor, commercial, professional, societal, or purchasing relationship with GEOTRANSPORT S.A., they must sign the respective clauses, addendums, informed consents, or authorizations, which will be communicated in advance by the company and accepted and signed by the data subject.

If the respective consent is not signed, provisions regarding the handling of personal data must be included in the master contract, work statement, purchase orders, or any document verifying the relationship with the particular subject. In any of the mentioned documents, at least the following should be established: the purpose and duration of the treatment, the nature and purpose of it, the type of personal data to be used, the data subjects, as well as the obligations and rights of GEOTRANSPORT S.A.

2. STORAGE OF PERSONAL DATA

Personal data will be stored only for the strictly necessary time to fulfill the purposes of each treatment. During the time necessary to comply with obligations arising from legal, labor, contractual, commercial, corporate relationships, as applicable; to address possible liabilities that may arise from the fulfillment of the purposes for which the data was collected; for the legal periods provided for in applicable regulations and for a maximum of time necessary for the prescription of legal actions. Therefore, a copy, with the data properly blocked, may be kept as long as liabilities may arise from the provision's execution or pending legal prescription periods.

3. SPECIAL PROVISIONS FOR THE PROCESSING OF PERSONAL DATA

I. Processing of sensitive personal data

GEOTRANSPORT S.A. does not process sensitive personal data unless it has the express, prior, and informed authorization of the data subject.

In this case, in addition to meeting the requirements for authorization, GEOTRANSPORT S.A. will inform the data subject:

- 1) That, as sensitive data, they are not obligated to authorize their processing.
- 2) Which of the data to be processed is sensitive and the purpose of the processing.

Additionally, GEOTRANSPORT S.A. will process sensitive data collected under security and confidentiality standards corresponding to its nature. For this purpose, GEOTRANSPORT S.A. has implemented administrative, technical, and legal measures contained in its Privacy and Personal Data Protection Policy, mandatory for its employees

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and, where applicable, for its suppliers, business partners, shareholders, customers, and other natural persons who have relationships with the company.

II. Processing of personal data of children and adolescents

GEOTRANSPORT S.A. will only process data relating to children and adolescents if this processing responds to and respects the best interests of children and adolescents and ensures respect for their fundamental rights.

1) Once the above requirements are met, GEOTRANSPORT S.A. must obtain the authorization of the legal representative of the child or adolescent, following the exercise of the child's right to be heard, an opinion that will be considered taking into account the maturity, autonomy, and capacity to understand the matter.

1. APPOINTMENT OF DATA PROTECTION OFFICER (hereinafter DPO)

The natural person responsible for advising, overseeing and supervising independently the compliance with the legal obligations attributable to the data controller and data processor, to whom the data subject or interested party provides information to GEOTRANSPORT S.A.

The data protection officer will perform their functions in a professional manner, with total independence from the data controller and data processor, who will be obliged to provide the assistance, resources, and elements that are promptly requested to ensure compliance with the duties, functions, and responsibilities of the data protection officer.

GEOTRANSPORT S.A. will be obliged to appoint a data protection officer when it falls within the following categories:

- 1) When the activities of the data controller or data processor require permanent and systematic monitoring due to the volume, nature, scope, or purposes of the processing, as established in this Law, its regulations, or in the regulations issued by the Data Protection Authority; and,
- 2) When it involves the processing on a large scale of special categories of data, in accordance with the provisions of the regulations of this Law.

However, as a good practice mechanism and as part of proactive responsibility measures, the Company may voluntarily appoint a data protection officer.

If you need to contact the DPO of GEOTRANSPORT S.A. to request any right of the data subject or interested party or for assistance in revoking or modifying consent, you can do so by email at protecciondatos@geotransport-sa.com, or at the registered office of GEOTRANSPORT S.A.

As a guarantee of informed consent and transparency of legitimate interest, the declaration of personal data protection will redirect for more details to the privacy policy

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notice published on this website: <https://www.geotransport-sa.com/privacy-policy-notice> and in the footer of the emails of GEOTRANSPORT S.A. collaborators.

An email privacy and data protection notice must be generated, informing how the personal information of GEOTRANSPORT S.A. shareholders, employees, customers, and suppliers related to the processing of personal data is handled and used; rights of access and updating, for which the data subject may do so by downloading a form from the company's website and addressing the request to the data protection officer; and, the privacy and data protection policy.

The DPO will sign a confidentiality and personal data protection clause for the information they handle from GEOTRANSPORT S.A.

Compliance with this Privacy Policy for the various areas of GEOTRANSPORT S.A. will be subject to review and supervision by the area designated by the company in conjunction with the Data Protection Officer, who will be empowered to carry out sample inspections of the controls that correspond to ensure compliance with the Organic Law on Personal Data Protection and this Policy.

To be a data protection officer, it will be required to: i. have political rights; ii. Be of legal age; iii. have a third-level degree in law, information systems, communication, or technologies; and, iv. demonstrate professional experience of at least 5 years.

The following persons may not be data protection officers: i. those who are part of the management and control bodies of the data controller and data processor; ii. Shareholders or partners of the data controller and data processor; iii. spouses of the administrators, directors, or auditors of the company, if any, of the data controller and data processor, or their relatives up to the fourth degree of consanguinity or second degree of affinity; iv. those who have conflicts of interest with the data controller and data processor.

2. RELATIONSHIP WITH THE CONTROL AUTHORITY

GEOTRANSPORT S.A. will maintain a fluid dialogue and compliance with the Data Protection Authority. GEOTRANSPORT S.A. may share information and personal data according to the requirements made by the Data Protection Authority.

3. UPDATING OF PRIVACY POLICY AND PERSONAL DATA PROTECTION

Notwithstanding the preferential application of the Organic Law on Personal Data Protection for this purpose, as well as informative texts contained in data collection forms published by GEOTRANSPORT S.A. Any modification of this policy will be communicated by the company.

4. APPLICABLE LEGISLATION

The Privacy Policy and Personal Data Protection accepted and implemented by GEOTRANSPORT S.A. are governed by the provisions of the current legislation on the

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protection of Personal Data referred to in Article 66 of the Constitution of the Republic of Ecuador, the Organic Law on Data Protection, its Regulations, and other corresponding regulations.

5. POLICY VALIDITY

This Privacy Policy and Personal Data Protection has been in effect since May 2, 2023.