

	<b>Personal data processing and protection policy</b> Legal	Effective date 13/01/2025	
		Version	5
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This Policy was originally written in Spanish. In the event of any discrepancies between the original and a translated version, the original Spanish version shall prevail.

All natural persons who are holders of personal data will be referred to in this document as the HOLDER.

FYCO has developed this PERSONAL DATA PROCESSING POLICY, which aims to provide the necessary and sufficient information to the various stakeholders, as well as establish the guidelines that guarantee the protection of personal data processed by FYCO. This ensures compliance with the law, policies, and procedures for addressing the rights of data subjects, as well as the criteria for the collection, storage, use, circulation, and deletion of personal data. The following points are taken into account:

## 1. DEFINITIONS.

- **Data Subject:** This is the natural or physical person whose personal data is being processed.
- **Personal Data:** Any information linked to or that can be associated with one or more identified or identifiable natural persons. "Personal data" should therefore be understood as information related to a natural person (an individual) such as, for example, a name, an identification number, location data, an online identifier, or one or more elements of the physical, physiological, genetic, mental, economic, cultural, or social identity of that person;
- **Data Processing (or "Processing"):** This is any operation or set of operations performed on personal data, such as collection, storage, use, circulation or deletion.
- **Data Controller:** This is the natural or legal person, and in this case, a private individual, who, alone or jointly with others, determines the purposes and means of the processing of personal data.  
the data.

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- Data Processor: This is the natural or legal person who processes personal data on behalf of or through a mandate from the DATA CONTROLLER.
- Database: It is the organized set of personal data that are the subject of Treatment.
- LA/FT: It stands for “Money Laundering and Terrorist Financing”.
- PADM: It stands for “Proliferation of weapons of mass destruction”.

## 2. PRINCIPLES.

The following principles are specifically applied in the processing of your personal data:

- Principle of legality: At FYCO, the data of the DATA SUBJECTS is processed in accordance with the laws governing this matter in the countries where we operate and have active services. We do not process partial, incomplete, fragmented, or misleading data.
- Principle of purpose: The processing of data subjects' personal data is for a defined, legitimate, explicit, and informed purpose, in accordance with the laws in force in the countries where we operate and have active services. Data subjects can learn about the purposes for which their personal data is processed in this document.
- Principle of freedom: We process data only with the prior, express, and informed consent of the DATA SUBJECT. Personal data is not obtained or disclosed without prior authorization, or in the absence of a legal or judicial mandate that waives the requirement for consent.
- Principle of transparency: We guarantee the right of the HOLDER to obtain from the data controller at any time and without restrictions, information about the existence of personal data that affects him or her.
- Security Principle: Information subject to processing is handled with the necessary technical, human, and administrative measures to ensure the security of the records, preventing their alteration, loss, unauthorized or fraudulent access, use, or disclosure. • Confidentiality Principle: All FYCO personnel involved in the processing of personal data are obligated to guarantee the confidentiality of the

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information, even after the termination of their relationship with any of the tasks involved in the Treatment.

- The principle of storage limitation: Data retention is limited to the purposes for which the processing is carried out. Once those purposes have been achieved, the data is deleted *or, at least, stripped of any element that allows the identification of the data subjects.*

### 3. WHO DOES THIS POLICY APPLY TO?

This Personal Data Processing Policy applies to all databases, both physical and digital, containing personal data and processed by FYCO, the data controller. It also applies in cases where FYCO acts as the data processor.

The policy is aimed at ensuring that employees, shareholders, contractors, suppliers and the general public have access to the necessary and sufficient information about the different processing activities and purposes for which their data will be used, as well as the rights that they, as data subjects, can exercise against FYCO.

### 4. Who is responsible for the processing?

The entity responsible for processing the databases covered by this policy is:

- FYCO CSCSAS, a company identified with Tax ID No. 901249186-1, whose contact details They are as follows: Address: Carrera 43 A 5 A 113 OFI 401 ONE PLAZA. Email: [datos\\_personales@fycotelecom.com](mailto:datos_personales@fycotelecom.com)

### 5. AUTHORIZATION OF THE OWNER FOR THE PROCESSING OF DATA.

FYCO requires the free, prior, express, and informed consent of the data subject for the processing of their personal data, except in cases expressly authorized by law. This authorization must be granted by the data subject, who must prove their identity sufficiently.

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The personal information we process is limited to identifying data: name and surname, location, telephone number and email address.

## 6. WAYS TO OBTAIN AUTHORIZATION FOR THE PROCESSING OF YOUR DATA PERSONAL.

We collect the HOLDER'S personal information through various means, such as our contracts, website, social media, forms and trade fairs, but the HOLDER will always be informed at the time about the person responsible for processing, the purposes and the retention period of their information, as well as how they can exercise their data protection rights.

- **SOCIAL NETWORKS:** FYCO uses social networks, and this is another way to communicate with the DATA SUBJECT. These social networks have their own privacy policies that explain how they use and share your information. Therefore, FYCO recommends that the DATA SUBJECT consult these policies before using these social networks to confirm that they agree with how their information is collected, processed, and shared.
- **WEBSITE:** Through our website, we collect personal information related to your browsing activity through the use of cookies. We also request your email address to send you the latest news and/or events.
- **TRADE FAIRS:** FYCO may request the OWNER'S authorization for the processing of personal data during the various trade fairs it attends or develops.

The HOLDER'S authorization is not necessary in cases expressly excluded and/or indicated by the applicable law on the protection of personal data.

## 7. WHAT ARE THE PURPOSES AND USES OF PERSONAL DATA?

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FYCO will carry out operations that include the collection, storage, use, circulation and/or deletion of personal data.

This processing of personal data will be carried out exclusively for the purposes authorized and stipulated in this Policy and in the specific authorizations granted by the data subject. Personal data will be processed according to the data subject group and in proportion to the purposes of each processing activity, as described below:

Customers:

Administrative, commercial, promotional, informational, marketing and sales purposes. b) Offer all types of commercial services, as well as conduct promotional, marketing, and advertising campaigns. c) Carry out all internal procedures and ensure compliance with accounting, tax, and legal obligations. d) Manage the company's accounting and invoicing processes. e) Maintain a digital file containing information related to each client contract. f) To enable participation in our Fyco courses

Learning.

Potential clients:

Advertising or promotional purposes, providing information about our services, marketing and sales. b) To offer all types of commercial services; as well as to carry out promotional, marketing, and advertising campaigns.

Suppliers:

For all purposes related to the subject matter of selection processes, contracts, or related matters. b) Carry out all internal procedures and ensure compliance with accounting, tax, and legal obligations. c) Manage the company's budget chain: company payments, issuance of certificates, income and withholding tax reports (for individuals and legal entities), and payment records. d) Manage the company's accounting process. e) Perform

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All activities necessary for the fulfillment of the different contractual stages in the relationships with suppliers and contractors. f) Issue the contractual certifications requested by the company's contractors or requests from the control entities. g) Maintain a digital file that allows having the information corresponding to each contract.

Candidates interested in job vacancies or employees:

The purpose of providing the data supplied by those interested in FYCO vacancies and the personal information obtained from the selection process is limited to participation in the same or future selection processes where there are vacancies that apply to the person's profile; therefore, its use for different purposes is prohibited.

This data is processed for the following purposes: a) managing the employment relationship between FYCO and the employee; b) reporting data to the social security system; c) carrying out all internal procedures and complying with accounting, tax, and legal obligations; d) issuing employment certificates requested by company employees or by regulatory bodies; e) managing the company's budget chain: payments, issuing income and withholding certificates, and payment reports.

Handling personal data for searching lists:

The Data Subject authorizes FYCO to: a) Conduct the necessary consultations and controls for the prevention of money laundering and terrorist financing, verifying any sources it deems necessary, as well as the information provided in the OFAC (Office of Foreign Assets Control) or United Nations lists. b) Submit reports to the competent authorities regarding money laundering and/or terrorist financing as deemed necessary, in accordance with its corporate policies and its AML/CFT – AML/CFT and Corruption prevention and/or administration manuals. c) Use the personal data of those associated with the company and, in general, the information obtained by virtue of the established business relationship for compliance with its respective AML/CFT – AML/CFT and Business Ethics programs.

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## 8. HOW LONG DO WE KEEP PERSONAL DATA?

At FYCO, we only retain the personal data of the DATA SUBJECTS for the period of time necessary to fulfill the purposes for which they were collected, comply with our legal obligations and address any possible liabilities that may arise from fulfilling the purpose for which the data was collected.

If the HOLDER wishes to join our team and applies for one of our job positions, the data provided will be added to our job pool and will be kept for the duration of the selection process and for a maximum of 2 years or until they exercise their right to erasure, whichever comes first.

If at any time we have collected the personal data of a DATA SUBJECT in order to contact them as a potential customer of our products or to respond to a request for information made by you, this data will be kept for a maximum of 5 years from its collection, and will be deleted after this period if a contractual relationship has not been formalized or at the time you request it.

In any case, and as a general rule, we will keep the HOLDER's personal data while there is a contractual relationship that binds us both or until they exercise their right to erasure and/or limitation of processing, in which case, the information will be blocked without using it beyond its storage, while it may be necessary for the exercise or defense of claims or some type of liability may arise that has to be addressed.

## 9. WHAT ARE YOUR RIGHTS REGARDING THE PROCESSING OF YOUR DATA AND HOW?

### CAN YOU EXERCISE THEM?

Data protection regulations allow DATA SUBJECTS to exercise their rights of access, rectification, erasure or revocation and data portability and objection and limitation to their treatment.

Data subjects may submit a request exercising their rights, which must contain at least the following:

- Name of the Holder, and of their representatives, if applicable.

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- Specific and precise request for information, access, updating, rectification, cancellation, opposition or revocation or suppression of consent for the processing of personal data.
- Physical and/or electronic address for notifications.
- Documents that support the request.
- Signature of the application by the Holder.

To exercise your rights, FYCO provides the following means:

- By means of a written and signed request addressed to our email address: [datos.personales@fycotelecom.com](mailto:datos.personales@fycotelecom.com).

The HOLDER interested in exercising the rights, will prove their status by means of a copy of the identity document.

If the HOLDER is represented by a third party, the respective power of attorney must be provided. In this case, the attorney must also prove their identity in the terms indicated, all of the above to verify that we only respond to the interested party or their legal representative.

## 10. WHAT IS THE RESPONSE TIME TO REQUESTS AND COMPLAINTS?

HOLDERS located in Chile: We must respond to your request within two (2) business days of receiving it.

ACCOUNT HOLDERS located in Costa Rica: We must respond to your request within five (5) business days of receiving it.

Requests from data subjects located in other Latin American countries where we have a presence will be addressed within a maximum of ten (10) *business* days from the date of receipt. If it is not possible to address the request within this period, the interested party will be informed before the ten (10) days expire, stating the reasons for the delay and indicating the date on which their request will be addressed, which in no case

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The case may exceed five (5) *business* days following the expiration of the first term unless the Personal Data Protection Law indicates a special or shorter term.

Claims will be addressed within a maximum of fifteen (15) business days, starting from the day after the date of receipt of the filing, unless the Personal Data Protection Law of the country where the DATA SUBJECT is located specifies a special term. If it is not possible to address the Claim within the stated term, FYCO will inform the applicant, indicating the reasons for the delay and the date on which the Claim will be addressed, which in no case may exceed eight (8) business days following the expiration of the first term, unless the Personal Data Protection Law specifies a special term or

minor.

#### 11. WHAT DOES FYCO DO FOR THE SECURITY OF MY PERSONAL DATA?

FYCO takes the necessary technical, human, and administrative measures to maintain the security of data subjects' information and strives to prevent its loss, alteration, unauthorized access, or consultation by third parties through industry-standard technologies and internal procedures. FYCO also employs the following security measures:

- With security protocols and access to information systems, storage and processing, including physical security risk control measures.
- FYCO has a duty to notify the relevant authorities if there is an information security breach headlines within 72 hours of the same.
- Access to the different databases is restricted even for some of the collaborators.
- All employees and third parties have signed confidentiality clauses in their contracts and are committed to the proper handling of databases in accordance with the guidelines on information processing established in the Law.
- Documents or electronic media (CDs, pen drives, hard drives, etc.) containing personal data will not be discarded without ensuring their effective destruction.

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- Have profiles with administrative rights for system installation and configuration, and users without privileges or administrative rights for access to personal data.
- The devices and computers used for the storage and processing of Personal data is kept up-to-date to the extent possible.
- To prevent unauthorized remote access to personal data, we will ensure that a firewall is activated and correctly configured on the computers and devices where personal data is stored and/or processed.
- When it is necessary to extract personal data outside the premises where it is processed, whether by physical or electronic means, the possibility of using an encryption method should be considered to guarantee the confidentiality of personal data in case of unauthorized access to the information.
- Backups: Periodic backups will be performed in the cloud to allow for the recovery of personal data in case of data loss.  
information.
- We use Transport Layer Security (TLS) to encrypt information as it travels across Internet.

All these security measures are reviewed periodically to ensure their suitability and effectiveness. However, absolute security cannot be guaranteed, and no security system is impenetrable. Therefore, if any information processed and under our control is compromised as a result of a security breach, we will take appropriate measures to investigate the incident, notify the relevant Data Protection Authority in the respective country, and, where applicable, inform any affected data subjects so they can take appropriate action.

## 12. TO WHOM DO WE COMMUNICATE THE DATA?

FYCO may transfer and transmit personal data to third parties with whom it has a commercial or operational relationship, in accordance with applicable regulations.

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In such cases, the necessary measures will be taken to ensure that those who have access to your personal data comply with this Policy and with the principles of personal data protection and obligations established by law. In any event, when FYCO transfers data to one or more processors, it will establish contractual clauses or enter into a personal data transfer agreement which will specify:

- Scope of treatment.
- The activities that the person in charge will carry out on behalf of FYCO and;
- The obligations of the Processor towards the owner and FYCO.

Through this contract, the Processor will commit to implementing FYCO's obligations under this Data Processing Policy and to processing data in accordance with the purpose authorized by the Data Subjects and with applicable laws. In addition to the obligations imposed by applicable regulations, the following obligations must be included within the aforementioned contract for the respective Processor:

- To process, on behalf of FYCO, personal data in accordance with the principles that  
They are under their guardianship.
- Safeguard the security of databases containing data  
personal.
- Maintain confidentiality regarding the processing of personal data.

**DELIVERY OF PERSONAL DATA TO THE AUTHORITIES.** When FYCO is requested to provide personal data by a public or administrative entity in the exercise of its legal functions or by court order.

Access and/or delivery of Personal data contained in any of its databases, the legality of the request will be verified, the relevance of the data requested in relation to the purpose expressed by the authority, and a record of the delivery of the personal information requested will be signed, specifying the obligation to guarantee the rights of the HOLDER, both to the official who makes the request, to the one who receives it, as well as to the requesting entity.

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FYCO COMPANIES: To parent companies and/or affiliates and/or subsidiaries and/or related companies or companies belonging to the same business group as FYCO for purposes established in this policy.

### 13. CHANGES TO THE PRIVACY POLICY.

FYCO reserves the right to modify these data processing policies at any time. Any changes to the Privacy Policy will take effect from the "last updated" date, and the user's continued use of the service after the last revision date will constitute acceptance of these changes.

- For any clarification regarding these regulations, you can send us an email or request to the following address:  
[datos.personales@fycotelecom.com](mailto:datos.personales@fycotelecom.com) \_\_\_\_\_