

Privacy and Information Confidentiality Statement of **Qubik Digital**

Privacy Notice

Last Update: November 2023

Dear Inquirer / Beneficiary / Client / Professional,

Customizing S.A. ("Service Provider"), with its registered office at Olazabal 2207, Suite 20C, in the Autonomous City of Buenos Aires, Argentine Republic (C1428ARD), is the entity responsible for collecting, processing, and safeguarding your personal data.

For all legal purposes as provided in this privacy notice, the term "Qubik Digital" refers to Customizing S.A. ("Service Provider").

The information (personal data and sensitive personal data) you provide to "Qubik Digital" will be processed in accordance with the provisions of this Privacy Notice.

This Policy does not apply to third-party sites linked to Qubik Digital websites, over which Qubik Digital has no control over the content or privacy protection procedures. Therefore, we recommend that if you access the mentioned websites, you review the Terms and Conditions and privacy policies available on the sites you visit beforehand.

By using the services provided by our company, you automatically accept and submit to the legislation concerning the protection of personal data, as per the location of your residence and any international treaties to which your country may be a party, as well as the following in particular:

A. Purpose and Processing of Personal Information:

The data we collect will be used for the following purposes:

- 1- Providing services that offer flexible software development solutions and strategies with a focus on E-Commerce and CRM by registering you in our personal data protection database as a service user.
- 2- Promoting the overall well-being of our users through the handling, response, recording, monitoring, storage, communication to specialists, and registration of requested inquiries (via telephone, WhatsApp Business, or through the internet), keeping them as support for future consultations and for compliance with the law.

- 3- Informing the user about changes or new services related to the software development and strategy services contracted by your sponsoring company.
- 4- Informing the user about upcoming events or services of Qubik Digital or any of its affiliated companies and/or legal entities.
- 5- Evaluating the quality and organization of Qubik Digital.
- 6- Fulfilling the obligations arising from the contracts entered into between Qubik Digital and the sponsoring company that contracted the software development and strategy services.
- 7- Fulfilling any obligation arising from the current or future legal relationship as indicated in the preceding clause.
- 8- Transmitting them to third-party suppliers or contractors to provide or continue the provision of services that Qubik Digital is contractually obligated to offer you.
- 9- With your prior express and informed authorization, transmitting your personal data and sensitive personal data to your employing company or the entity that contracted the service to third parties in the event of an emergency situation.
 - a. Additionally, we will use your personal information for the following purposes, which are not necessary for providing the requested service but allow us to offer you a better quality of care:(i) Conducting satisfaction surveys regarding the use of the service; (ii) Receiving information about related activities by phone, WhatsApp Business, and email. If you do not wish for your personal data to be processed for these additional purposes, you can restrict their use by sending a written request to the address located at Olazabal 2207, Suite 20C, in the Autonomous City of Buenos Aires, Argentine Republic. Refusing the use of your personal data for these additional purposes will not be a reason for us to deny the services and products you request or contract with us or that have been contracted for you.
- 10- Regardless of the above, your data may be used, including but not limited to, for the following purposes: (i) Providing the goods and/or services you have requested or expressed interest in; (ii) Ensuring efficient service and providing better user assistance, as well as enhancing your experience with the use of certain products and/or services; (iii) Inclusion in mass talks; (iv) Informing you about changes or new products or services related to what has been contracted or acquired; (v) Fulfilling obligations to our customers; (vi) Evaluating service quality, conducting internal studies on consumption habits, and compiling statistical reports.

For the purposes stated in this Privacy Notice, Qubik Digital may collect your personal data through various methods:

- 11- When the information is provided directly by you to our contact center through phone calls, messaging via WhatsApp, or through the application and email.
- 12- When you visit the websites of Qubik Digital, subsidiary companies, or related entities and enter your data through forms or direct inquiries.

- 13- When you engage with us on our social media platforms, such as by commenting or sending direct messages on any of our social media or public sites (e.g., Google).
- 14- When you visit our internet websites and enter your data.
- 15- In cases where you are referred to a professional at Qubik Digital to receive assistance on software development and strategies, the professional will request that you sign an informed consent to authorize us to process your personal data and sensitive personal data, as applicable.
- 16- When we obtain information through other means that are allowed by applicable laws.
- 17- The personal data obtained through the aforementioned means may include, but are not limited to: full name, employee number, Personal Identification Number, department within an organization, job position, email address, home, work, and mobile phone numbers, gender, address (street, number, neighborhood, city, state, postal code, country), date of birth, marital status, hobbies, occupation, social, family, psychological, legal, and health context, as well as dietary habits, lifestyle, and any other data required in accordance with the purposes established in this Privacy Notice and according to the service needs you request.

B. Principles we will apply in the treatment of personal data

In the processing of your personal data, we will apply the following principles:

- Principle of Lawfulness, Loyalty, and Transparency: Your consent will always be required for the processing of your personal data for one or more specific purposes, which will be transparently informed in advance.
- Principle of Data Quality: The data collected for processing purposes will be adequate and relevant in relation to the scope and purpose for which they were obtained.
- Principle of Data Minimization: Only data strictly necessary for the purposes for which they are required will be requested. The minimum necessary.
- Principle of Limitation of Data Retention Period: Data will be retained for no longer than necessary for the purposes of processing and in accordance with the legal deadlines provided for the prescription of civil liability actions. The corresponding retention period will be informed, and in the case of subscriptions, lists will be periodically reviewed, and inactive records for a significant period will be deleted.
- Principle of Integrity and Confidentiality: Your data will be processed in a way that ensures the appropriate security of personal data and confidentiality is guaranteed. Qubik Digital takes all necessary precautions to prevent unauthorized access or improper use of user data by third parties.
- Principle of Informational Self-Determination: Every person has the right to know who, when, for what purposes, and under what circumstances their personal data is contacted in order to control the flow of information

concerning each of them. This is derived from the right to privacy, preventing discriminatory actions.

- Principle of Portability: The data subject has the right to obtain from the data controller a copy of their personal data in a generic and commonly used format..

C. COLLECTED SENSITIVE DATA

Sensitive personal data is considered to be data that affects the most intimate sphere of the data subject, or whose misuse could lead to discrimination or pose a serious risk to them. In particular, sensitive data may reveal aspects such as racial or ethnic origin, present or future health status, genetic information, religious, philosophical, and moral beliefs, union membership, political opinions, and sexual preferences. This information is only collected by Qubik Digital when it is essential for our services and is necessary to provide you with appropriate advice, and for this reason, you provide it voluntarily.

To carry out our service, we may use, collect, and process, as required by the case and the requested advice, the following data

- Identification Data: Name, marital status, place and date of birth, nationality, and data recorded in official documents that are necessary to prevent legal risks.
- Contact Information: State and municipality or place of residence, email address, phone number (home, work, mobile).
- Employment Data: Organization in which you work, department in which you work, emotional work situation, physical activity habits during work.
- Financial or Property Data of the organization to which you belong: General information related to its assets, rights, liabilities, or obligations that are capable of economic valuation, such as movable and immovable property; credit status; income, expenses, and financial habits.

Please note that not all of the aforementioned data will necessarily be required; however, you should consider that these data may be requested by our professionals when providing the guidance you voluntarily request to give you proper professional advice or service. If this is the case, when you provide us with your data, you accept and agree to this privacy notice and authorize us to process your data in accordance with the provisions of points a) to l) in section "A" of this notice.

D. Limitation on the use or disclosure of personal information

The data you provide us through any means of contact will not be disseminated, distributed, or commercialized (except as established in section A of this notice). The data collected in our processes will be stored, protected, and safeguarded with due

diligence through our information technology infrastructure to protect your personal data from damage, loss, alteration, destruction, or unauthorized use, access, or processing.

At any time, you can revoke your consent or limit the use, storage, transmission, and processing of the information provided to Qubik Digital by following the procedure indicated in the next section.

E. Exercise of the rights of access, rectification, cancellation, and opposition (arco rights).

You have the right to know what personal data we have about you, how we use it, and the conditions under which we use it (Access). Additionally, you have the right to request the correction of your personal information if it is outdated, inaccurate, or incomplete (Rectification); to have it deleted from our records or databases when you believe it is not being used in accordance with the principles, duties, and obligations provided by law (Cancellation); and to object to the use of your personal data for specific purposes (Opposition). These rights are known as ARCO Rights.

You can also (i) request proof of the authorization given; (ii) file complaints with the relevant regulatory authority for any potential breaches of current regulations; (iii) revoke the authorization granted; and (iv) choose not to answer questions about sensitive data. Therefore, we inform you that responses regarding sensitive data or data about minors are optional.

The organization has a specific department (Personal Data Department) with the main functions of establishing and managing procedures for receiving, processing, tracking, and providing timely responses to requests for the exercise of ARCO rights, as well as addressing complaints or requests submitted by data subjects related to the organization's data protection policies and practices.

To exercise any of the ARCO rights, you should follow the following steps:

1. *Submit a Written Request: Prepare a written request addressed to the Personal Data Department at:*
 - a. info_ar@qubikdigital.com
 - b. Olazabal 2207, Suite 20C de la Ciudad Autónoma de Buenos Aires, República Argentina(C1428ARD) .
2. *Your request should clearly state which right (Access, Rectification, Cancellation, or Opposition) you wish to exercise.*
3. *Include Required Information: Your request must include the following information:*
4. *Your full name and contact information.*
5. *Documents that prove your identity or, if applicable, your legal representation.*

6. *A clear and accurate description of the personal data for which you are exercising your rights.*
7. *Any other element or document that facilitates the location of your personal data.*
8. *Delivery: Submit your written request, along with the required documents, to the address mentioned in the request. You may also send your request via email to info_ar@qubikdigital.com.*
9. *Wait for Response: We will respond to your request within 10 business days. This period may be extended by an additional 5 business days if necessary. We will inform you of the response through the contact information you provided.*
10. *Verification: We may request additional information or documents for verification if needed.*

A denial of the request may occur in the following cases:

- a. When the requester is not the data subject, or the legal representative is not duly accredited for this purpose.
- a. When the personal data of the requester is not found in our database.
- b. When there is a legal impediment or a resolution from a competent authority that restricts access to personal data or does not allow rectification, cancellation, or opposition to the data.
- c. When rectification, cancellation, or opposition has already been previously carried out.

For the exercise of ARCO rights regarding personal data of minors or individuals who are under legal interdiction or incapacity, the rules of representation provided in the applicable regulations for such cases will be followed.

You can revoke your consent at any time that you have given us for the processing of your personal data. However, it's important to note that in some cases, we may not be able to immediately fulfill your request or cease the use of your data due to legal obligations that may require us to continue processing your personal data. Additionally, you should consider that for certain purposes, revoking your consent may mean that we cannot continue providing our services to you.

F. Control and security of personal information.

Qubik Digital employs appropriate technical and organizational measures to protect the information collected, utilizing security technologies and access control procedures. We also strive to prevent the use or disclosure of your personal information without authorization, such as storing the provided information on servers located in Data Centers with limited access controls. However, no security system or data transmission system over which the company has no control and/or depends on the internet can guarantee total security.

Please note that, due to the absolute confidentiality of our service, we cannot provide you with any information about third parties, including minors, direct or collateral family members, spouses, or partners.

Remember that the processing of personal data and sensitive personal data is subject to this PRIVACY NOTICE, as well as the LEGAL TERMS AND CONDITIONS OF SERVICE, the knowledge and acceptance of which are solely your responsibility.

In terms of the law, this privacy notice, and the contractual agreement established when you use our services, you authorize the following:

A. Except in exceptional cases and with prior notification, if you provide PERSONAL DATA and SENSITIVE PERSONAL DATA to Qubik Digital (or its personnel), Qubik Digital will assume the role of DATA CONTROLLER for the processing of such information. Qubik Digital may create a written record summarizing the received communications, storing the complete communication for a minimum period of six months (which can be extended in accordance with laws regarding the prescription of actions arising from civil liability), with strict confidentiality. This is done for the purpose of: (i) Providing comprehensive follow-up to inquiries made by users of our services; (ii) Resolving any type of service-related complaint or claim that may arise, thus providing a quality service, and (iii) in accordance with the applicable statute of limitations criteria in each case.

- a. Communications made by an individual using our services cannot be delivered to third parties and will be kept in strict confidentiality by Qubik Digital, except as provided in this PRIVACY NOTICE.
- b. By contractual agreement with you, when using our services or authorizing their use by minors or incapacitated individuals, Qubik Digital will be obliged to store, for a minimum period of six months from the date of receipt, the written records or any communication provided by users of the services, with the exception indicated in point a) of this section.
- c. By using our services, you agree, authorize, and consent that, in the event that you or someone else makes comments that may suggest or imply the existence of a real situation that could potentially harm any individual in their person or property, then Qubik Digital, its employees, collaborators, or contractors may, at their discretion, transfer, even without the consent of the data subject, the personal data and sensitive personal data that are considered absolutely necessary for the purpose of safeguarding the integrity of the user of our services or the people around them.
- d. The transmission of personal data may be made to the entity that contracted our services for you and/or the involved third parties and/or the relevant authorities, as appropriate, who will become DATA CONTROLLERS for the processing of your DATA.
- e. Except for the exceptions provided for by law, Qubik Digital will, at its discretion, proceed to cancel your data or communications within 5 (five) business days following the occurrence of any of the following

events: (i) the purpose for which the data was provided has ended; (ii) when it is no longer necessary to process them for the purposes of applicable legal provisions; (iii) the minimum mandatory data retention period set forth in the contract or by law has expired; or (iv) when so required, in writing, by the data subject, unless the law requires them to be kept for a specific period, in accordance with what is set forth in this Privacy Notice.

- f. The cancellation of your personal data and sensitive personal data will lead to a blocking period, after which permanent deletion will be carried out. During the blocking period, the provided data cannot be processed. Qubik Digital may retain them during the blocking period, solely for the purpose of responsibilities arising from the processing.
- g. When the storage period of personal data and sensitive personal data exceeds the period of prescription of actions derived from the legal relationship that underlies their processing, as defined by applicable law, Qubik Digital is obligated to permanently delete each and every document, lists, electronic or magnetic media, microfilms or films, recordings, and other similar instruments or recording media known or to be known, through which data has been collected or provided, as well as all copies and replicas thereof.

G. The transfer of your personal data

All personal data you provide to us through the use of the service and the websites you visit may be transferred or stored in a geographical region with different privacy policies from your home country. This might involve sending your personal data to a country with less strict data protection laws than your own. Such transfers will be made in accordance with applicable laws.

Through this means, you authorize Qubik Digital to transfer and/or send your personal data to a third individual or legal entity, or to an authority, in the following cases:

- .It is allowed by law.
- i.The data is obtained from publicly accessible sources.
- ii.The personal data undergo a prior dissociation process (your personal data is isolated from statistical data).
- iii.There is an emergency situation that could potentially harm you or another individual's physical integrity, person, or property.
- iv.It is necessary to fulfill an obligation between you and Qubik Digital, or between the sponsoring company that contracted our services and Qubik Digital.
- v.It is essential for guidance, prevention, diagnosis when you are unable to provide consent.

- vi. A judicial authority's resolution is issued.
- vii. It is necessary for Qubik Digital to continue providing services.
- viii. It is required to address a complaint or claim about our services.
- ix. It is necessary for you to receive timely assistance from our services.
- x. In all other situations indicated throughout this Privacy Notice.

H. Protection

The security and confidentiality of the data provided by users when using our services will be protected by a secure server so that the data sent will be transmitted in encrypted form to ensure its safeguarding.

However, even with increasingly secure tools, 100% protection of data sent over the Internet cannot be guaranteed. Therefore, once received, Qubik Digital will do its utmost to safeguard the information..

I. Use of cookies and web beacons

The Qubik Digital website (www.qubikdigital.com) uses cookies to help us gather statistical information about your use of the site. You can delete the cookie used by our site at any time by accessing your browser's settings. Likewise, you can prevent this file from being reinstalled by making the corresponding adjustments in your browser's settings.

Additionally, we also use web beacons, which are images embedded in a web page or email used to monitor a visitor's behavior, such as storing information about the user's IP address, duration of interaction on that page, and the type of browser used, among other things. Like cookies, you can also prevent the use of this tool through your browser's settings.

J. Data retention

Personal data will be kept by Qubik Digital until the User requests their deletion and will be retained for the legal periods for the fulfillment of obligations and the attention of possible responsibilities, as explained in this PRIVACY NOTICE.

K. Minors

The professional advisory service and this site are not designed or intended for use by individuals under 16 years of age. We do not knowingly collect any personal data from individuals under 16 years of age without the prior consent of their parents or guardians. Such parents or guardians have the right, upon request, to access the information provided by the minor and request its deletion. Furthermore, any minor

must obtain the authorization of their parents or guardians before using or disclosing any personal data on this site.

L. Marketing data use

Qubik Digital will not sell or transfer your personal data to any entity outside of its corporate group for direct commercial use, unless we clearly communicate this to you and obtain your express consent.

M. Changes to this privacy statement

Qubik Digital reserves the right to make modifications to this privacy notice; therefore, it may undergo changes or updates without prior notice, driven by new legal requirements, the needs of the products or services we offer, our privacy practices, changes in our business model, or other causes.

If changes to this statement occur, we will communicate them through the following website: www.qubikdigital.com, accessible at the bottom of the same page in the "Policies and Privacy Notice" section.

Therefore, we recommend visiting this privacy statement periodically to stay informed of any updates. The date of the last revision is located at the end of this page.

Please remember that by using Qubik Digital services, you accept this Privacy Notice, as well as the Terms and Conditions of Use. Otherwise, you should refrain from accessing this site, calling our contact center, contacting us through any access channel, and using Qubik Digital services.

N. Regulation

- Data Protection Law No. 25,326 of the Argentine Republic
- Constitutional and the Federal Law on the Protection of Personal Data Held by Individuals in Mexico
- Law No. 19,628 on the Protection of Privacy in Chile; Law 1,581 of 2012 and its regulatory decree 1,377 of 201 in Colombia
- Law 8,968 on the Protection of Individuals in Costa Rica regarding the Processing of their Personal Data
- Law 172-13 on the Comprehensive Protection of Personal Data in the Dominican Republic
- Organic Law on the Protection of Personal Data in Ecuador
- General Data Protection Law of Brazil

- Article 2, second paragraph of the Constitution of El Salvador
- Law 787/12 in Nicaragua
- Law No. 81 on the Protection of Personal Data in Panama
- Law 18,331 partially modified by Law 20,075 in Uruguay
- Law 29,733 in Peru

Ñ. Regulatory authorities

It is hereby notified to the data subjects that the Access to Public Information Agency of the Argentine Republic, the Federal Institute for Access to Information and Protection of Personal Data of the United Mexican States, the Superintendence of Industry and Commerce of Colombia, the Directorate of Personal Data Protection of the Republic of Nicaragua, the Superintendency of Banks of the Dominican Republic, the Data Protection Agency of the Republic of Costa Rica, the National Authority for Transparency and Access to Information of the Republic of Panama, the Directorate General of Transparency, Access to Public Information, and Personal Data Protection of Peru, the Regulatory and Control Unit of Personal Data of Uruguay, the National Data Protection Authority (ANPD) of Brazil, and the Relevant Courts, in their respective capacities as the Regulatory Authorities for legislation regarding Personal Data Protection, have the authority to address complaints and claims lodged by those whose rights are affected by non-compliance with the current regulations on personal data protection.

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