## PRIVACY POLICY

CINETPERU S.A.C. (hereinafter referred to as CINETPERU) values its users and is dedicated to preserving the privacy of its users. As part of this commitment, we have formulated this privacy statement (hereinafter referred to as the "Privacy Policy" or simply the "Policy") which describes how CINETPERU will handle personal information provided in the context of its relationship with you for the use of this website and its applications (collectively, the "Website").

#### 1. OBJECTIVE

CINETPERU and associated companies, in accordance with the provisions of Law No. 29733 (hereinafter Personal Data Protection Law or Law), its Regulations, Supreme Decree No. 003-2013-JUS and the Information Security Directive, Directive No. 001-2014-JUS-DGPDP, adopt the "Personal Data Protection Policy" with the purpose of guaranteeing the fundamental right to the protection of personal data. The fundamental right to the protection of personal data, enshrined in Article 2, Section 6 of the Peruvian Constitution, is ensured through proper handling of personal data provided by customers, suppliers, contractors, subcontractors and employees, consistent with respect for other fundamental rights recognized in that framework.

The purpose of this policy is also to provide you with prior, explicit, detailed and easily understandable information about what information we collect, how we use and store it, who the recipients may be and what your rights are in relation to this information. We therefore recommend that you read and fully understand our Privacy Policy.

Information including names, addresses, e-mail addresses and any other information that can be linked to the identity of a natural or legal person, found in the contracts and applications of subscribers and holders, shall be considered personal data. This information will be treated as confidential and will be used exclusively for registration operations, unless there is prior consent from the holder of such data or it is provided for by a judicial or administrative order. To this end, a Privacy Plan will be implemented which will include controls to prevent unauthorized disclosure and use.

For the purposes of this policy, any reference to "the User", "the Users" or any variation of these terms refers to all persons other than CINETPERU who are registered users of the Website.

## 2. DEFINITIONS

- 2.1. Personal database: An organized collection of information about individuals, whether or not in automated form, regardless of the medium in which it is held, such as physical, magnetic, digital or other, regardless of how it was created, organized, stored or accessed.
- 2.2. Private database of personal data: A collection of information on individuals held by a natural or legal person under private law, provided that it is not directly related to the exercise of public law powers.
- 2.3. Public database of personal data: A collection of information about individuals held by a public body.
- 2.4. Personal data: Any numerical, alphabetical, graphic, photographic, acoustic or any other type of information relating to the personal habits or characteristics of a natural person that identifies him or her or makes him or her identifiable by reasonably available means.
- 2.5. Sensitive data: Personal information that includes biometric data capable of identifying the data subject on its own, as well as information about racial and ethnic origin, financial income, political opinions, religious, philosophical or moral beliefs, trade union membership, and details about health (physical or mental) or sex life, as well as other intimate personal, emotional or family characteristics that affect privacy.
  - 2.6. Working days: Days on which work is normally carried out.
- 2.7. Controller of personal data: Any natural person, legal entity under private law or public entity who, individually or jointly with another person, carries out the processing of personal data on behalf of the holder of the personal data database, in accordance with a legal relationship binding them and defining the scope of their activity. This also includes those who process data without a personal database.
- 2.8. Processor: The person or entity to whom the database owner provides personal data by virtue of a legal relationship that binds them. This legal relationship limits the actions of the processor of personal data.
- 2.9. Public entity: An entity referred to in Article I of the Preliminary Title of Law 27444, General Administrative Procedure Law, or its successor.

- 2.10. Cross-border transfer of personal data: International transfer of personal data to a recipient located in a country other than the country of origin of the personal data, regardless of the means or type of processing to which the personal data are subject.
- 2.11. Publicly accessible sources: Databases of personal data, whether publicly or privately managed, which may be consulted by any person, upon payment of the corresponding fee if applicable. Public access sources are defined in the regulation.
- 2.12. Adequate level of protection of personal data: A level of protection that includes, as a minimum, recording and compliance with the fundamental principles of this law, as well as technical security and confidentiality measures appropriate to the category of data concerned.
- 2.13. Legal person under private law: In the context of this law, this refers to a legal entity that is not subject to the scope of application of Article I of the Preliminary Title of Law 27444, Law on General Administrative Procedure.
- 2.14. Anonymization procedure: Processing of personal data that prevents identification or anonymizes the data subject. This procedure cannot be reversed.
- 2.15. De-identification procedure: Processing of personal data that prevents identification or renders the data subject unidentifiable. This procedure can be reversed.
- 2.16. Data controller of the personal data database: Natural person, legal entity under private law or public entity that determines the purpose and content of the personal data database, as well as its processing and security measures.
- 2.17. Transfer of personal data: Any sending, provision or disclosure of personal data at national or international level to a private legal entity, public entity or natural person other than the holder of the personal data.
- 2.18. Processing of personal data: Any operation or technical process, whether automated or not, which makes possible the collection, storage, organization, preservation, processing, alteration, retrieval, consultation, use, blocking, erasure, transfer by any means or dissemination, or any other form of processing which provides access to personal data or their interconnection.

# 3. IMPLEMENTATION OF THE PRIVACY PRINCIPLES

This policy extends to all personal information collected by CINETPERU and associated companies, whether in person, by telephone and/or virtually, both orally and in writing, in databases. This includes the data of customers, employees, suppliers, contractors and subcontractors of CINETPERU and associated companies.

This document adopts the guidelines established by APEC through the Privacy Policy Framework regarding the principles that should be followed whenever performing any work or function involving the collection, holding, processing, use, transfer or disclosure of personal information.

## 4. PREVENTIVE MEASURES

- 4.1. Access to personal data shall be restricted to authorized personnel.
- 4.2. This data shall be protected against unauthorized access.
- 4.3. Staff shall be sensitized to prevent accidental disclosure or exposure of users' personal data.
- 4.4. Procedures shall be established to document practices related to personal information collected during the operation or marketing of time-stamping services. Such procedures shall report on:
  - a. The fact that personal information is being collected.
  - b. The purposes for which such personal information is collected.
- c. The types of persons or organizations to whom this information could be disclosed.
- d. The identity and location of the personal information controller, including how to contact him or her regarding his or her practices and handling of personal information.
- e. The choices and means offered by the personal information controller to individuals to restrict use and disclosure, as well as the mechanisms for accessing and correcting their information.
- f. All reasonable steps should be taken to ensure that this information is provided either before or at the same time as the collection of the personal information. Otherwise, this information should be provided as soon as practicable.

4.5. It may not be appropriate to require personal information controllers to provide information about the collection and use of information that is publicly available.

# 5. COLLECTION OF PERSONAL DATA

Personal data is obtained exclusively from the information provided by users through the company's website, either by means of the contact form or by e-mail.

CINETPERU and associated companies, collect data mainly for the purpose of providing the services personally requested by you, in addition to other objectives, such as the following:

- 5.1. Facilitate contractors, subcontractors and suppliers to provide services that directly or indirectly support the operations of CINETPERU and associated companies.
- 5.2. Comply with legal or regulatory requirements imposed on CINETPERU and associated companies.
- 5.3. Improve or develop products and services offered in general by CINETPERU and associated companies to their clients.
- 5.4. Maintain contact with the client and, in general terms, manage the relationship between the client and CINETPERU and associated companies, in relation to the services provided, as well as informing the client about products, services and opportunities that may be of interest or benefit to them.
- 5.5. Create and analyze statistical data and, if necessary, share the results with third parties.

CINETPERU and associated companies will never use your personal data for purposes other than those mentioned above without your prior, informed, explicit and unequivocal consent, unless it is contemplated in Article 14 of the law.

In the event that the user provides data of third parties, he/she declares that he/she is responsible for having the consent of said third parties and undertakes to communicate

the information contained in this privacy policy to them, releasing CINETPERU from any responsibility in this regard.

CINETPERU will treat the user's data at all times in an absolutely confidential manner and in compliance with the duty of secrecy required by the applicable regulations. To this end, the necessary technical and organizational measures will be taken to guarantee the security of the data and prevent its alteration, loss, unauthorized processing or unauthorized access, taking into account the state of the technology, the nature of the data stored and the risks to which they are exposed.

## 6. TYPE OF PERSONAL DATA COLLECTION

The personal data, including sensitive information, that is collected by CINETPERU and its associated companies depends on a number of factors, such as your individual circumstances, the nature of your relationship with CINETPERU and its associated companies and the services provided by them. However, they may cover any combination of the following details:

- 6.1. Contact information, such as your name, postal address, e-mail address, tax identification number (RUC) and telephone number.
- 6.2. Details of your gender, date and place of birth, marital status, family members, nationality, country of residence, occupation, interests, habits and other similar demographic data.
- 6.3. Personal identification numbers, such as identity card number, foreigner's document number, passport number and driver's license number.
- 6.4. Information about you that CINETPERU and associated companies need to verify for tax or regulatory reasons, such as, for example, information about your identity.
- 6.5. Any other information about you that CINETPERU and associated companies collect in the course of their daily operations, your participation in meetings and events sponsored by CINETPERU and associated companies, as well as your correspondence with CINETPERU and associated companies' staff.

In general, CINETPERU and associated companies obtain personal data directly from customers, although they can also access them through public registers and databases.

When you register on our website (by submitting a request, complaint, claim, comment, suggestion or providing any other information), you provide us with personal information such as your name, address, email address, telephone number or other information. You may also grant us permission to access your information on other services.

For example, you may link your Facebook or Twitter account to our website, which allows us to collect information from those accounts (such as your contacts). The information we collect from these services often depends on the settings you have made or their own privacy policies, so please be aware of them.

Our website may contain links to websites that are not owned, controlled or maintained by CINETPERU and associated companies. We cannot be responsible for their privacy policies or practices. Similarly, we are not responsible for the policies or practices of the websites from which you linked to our site. We encourage you to review the privacy policies of these websites and to contact their operators if you have questions or concerns.

## 7. SECURITY MEASURES

Those responsible for personal information should implement appropriate security measures to protect such information against possible risks, such as loss of data or unauthorized access. They should also prevent situations of destruction, misuse, alteration or unauthorized disclosure. These security measures should be proportionate to the nature and severity of the potential damage, the sensitivity of the information and the context in which it is stored. In addition, it is important that they are subject to periodic review and evaluation.

# 8. ACCESS AND RECTIFICATION

- 8.1. Individuals should have the possibility to:
- 8.1.1. Confirm with the controller of the personal information whether or not it holds data concerning them.
- 8.1.2. Access your personal information after proper verification of your identity, within a reasonable time and at a cost that is not excessive. This should be done in a reasonable manner and in a format that is understandable.

- 8.1.3. challenge the accuracy of information concerning them and, where possible and appropriate, request the correction, completion, amendment or deletion of such information.
  - 8.2. Access and opportunity to correct information should be provided unless:
- 8.2.1. the cost or burden associated with this process is inappropriate or disproportionate to the risks to individual privacy in the particular case.
- 8.2.2. The disclosure of the information is not permitted for legal or security reasons, or to protect confidential business information.
- 8.2.3. The privacy of information of persons other than the individual concerned may be compromised. In the event that a request under (8.1.1) or (8.1.2) or a challenge under (8.1.3) is refused, the individual should be informed of the reasons for such refusal and provided with details of the procedures for challenging that decision.

## 9. CONSENT TO THE PROCESSING OF YOUR PERSONAL DATA

You are free to decide whether you wish to give us your consent to process your personal data. If you choose not to consent, we will not be able to use your personal data for the purposes mentioned above. However, it is important to note that in situations where you have entered into a contract with us or our affiliated companies in relation to a specific product or service, your data may only be used to fulfil the obligations arising from such contracts, in accordance with article 14, paragraph 4 of the Act.

#### 10. USE OF THE INFORMATION COLLECTED

CINETPERU and associated companies ensure confidentiality in the processing of personal data and have implemented security levels designed to safeguard them. All resources have been used and technical, organizational and legal measures have been applied to guarantee security and prevent the alteration, loss, manipulation or unauthorized access to personal data.

10.1. We use this information for the following purposes:

10.1.1. To provide our services and products to you, to develop new services and

products, and to protect both CINETPERU and associated companies and our internet users. Please note that when you visit our website, we may store information on your

device, commonly known as a "cookie". This information helps us to personalize your experience on the site and ensures that you do not have to enter your details on each visit.

If you prefer, you can delete or block this information on your device (instructions can be

found in the help screen or user manual).

10.1.2. Respond to your questions, follow up on your complaints and grievances,

and notify you of solutions to your problems.

10.1.3. Respond to your concerns or comments.

If you provide your consent, we may send you information to the email address

you have provided. This information may include details of new services and products, prevention campaigns, social activities of CINETPERU and associated companies in the community, newsletters, marketing material and any other information that may be of

interest to you.

10.1.4. Invite you to participate in our customer satisfaction surveys, among other

activities.

It is important to note that we do not share or sell your personal information to

third parties to contact you about their products and services. In addition, if you choose

to unsubscribe, you will not receive future communications from us.

11. DATABASE MANAGER AND RETENTION PERIOD

The database manager is:

CINETPERU S.A.C.

Email: legal@cinetperu.com

Data processing is carried out for as long as reasonably necessary to respond to queries raised, make improvements, enable our services and comply with applicable regulations. This means that we may retain your personal information for an appropriate period, even after you stop using the services of CINETPERU and associated companies,

or stop using this website. However, you have the option to withdraw your consent at any

time by contacting any customer service center and to exercise your rights of information, access, updating, correction, inclusion, deletion or suppression, opposition and revocation of consent in accordance with the legal provisions.

## 12. RIGHTS RELATED TO YOUR PERSONAL DATA

Fundamentally, you have the following rights:

# 12.1. Right of access and information:

You have the right to obtain information about yourself that is being processed in the databases of CINETPERU and associated companies, as well as to know the general conditions of the processing of your personal data.

# 12.2. Right to correction, updating and inclusion:

You have the right to update, supplement and correct your personal data that is being processed by CINETPERU and associated companies, in the event that it is partially or completely inaccurate, incomplete or if omissions, errors or inaccuracies have been identified.

# 12.3. Right of revocation or deletion:

You may request cancellation or deletion of your personal data when they are no longer necessary or relevant for the purpose for which they were collected, when the term of their processing has expired, or if the data subject has revoked his or her consent to the processing.

# 12.4. Right to object:

You have the right to object at any time to the processing of your personal data. You can object to the processing, unless there is a contractual or legal justification for the processing.

For further information, please do not hesitate to send us an e-mail to the following address: support@cinetperu.com.

# 13. PROCEDURE FOR EXERCISING YOUR RIGHTS IN RELATION TO YOUR PERSONAL DATA

In order to exercise your rights over your personal data, it is necessary to present an identification document (DNI/CE/Passport) as confirmation of your ownership. In case you are acting as a legal representative of another person, you must have the corresponding accreditation, i.e., present a power of attorney or document proving your authorization to act on behalf of the user and exercise your rights, in addition to your identification document. The personal data subject or his or her representative must complete an application form and, if necessary, submit supporting documents.

The application will be processed free of charge by CINETPERU and associated companies within the following deadlines, counting from the date of submission:

- Right to information: 8 working days.
- Right of access: 20 working days. In case the request is approved, access will be provided within 10 working days after the response.
- Right of correction, updating, deletion, suppression or opposition: 10 working days.

In addition, you also have the option to modify your account or update your details yourself on our website.

## 14. CASES FOR DISCLOSURE OF YOUR PERSONAL DATA

There are situations in which we may share your information:

- When you give your consent. This includes sharing information with other services (such as Facebook or Twitter) if you choose to post your comments there.
- By engaging third party companies or professionals to process personal data on our behalf, following our instructions and in accordance with this privacy policy.
- When we believe that disclosure is necessary to comply with laws, regulations or legal requirements.

- In the context of a merger, acquisition, dissolution, restructuring, transaction or other similar operation involving disclosure of the data described in this policy.
- We can also share data that does not identify you personally. For example, to find out how many people shared something you posted, or the percentage of people who clicked on a module, or how many visitors we have per day. This is for statistical purposes only and helps us in the management and administration of the website. This information does not contain personal data that would allow the identification or location of the visitor.

# 15. POLICY FOR CHILDREN AND ADOLESCENTS

Our web portal is intended for persons over 18 years of age. Therefore, those who do not comply with this requirement should refrain from providing personal data to CINETPERU and associated companies. If you discover that one of your underage children has provided us with information without your consent, please contact us at the following email address: support@cinetperu.com.

# 16. REQUESTS AND COMPLAINTS

For queries, complaints or to exercise your rights as a user, customer or holder of personal data, you may contact the data controller at the following e-mail address: support@cinetperu.com.

Data subjects may exercise their ARCO rights (Access, Rectification, Cancellation, Opposition) in accordance with the provisions of the Personal Data Protection Law, Law No. 29733, always attaching a copy of an official identification document.

The data controller and/or data processor shall respond to the applicant within the time limits set out in Law 29733. To this end, the request must contain all the data necessary and applicable to exercise the right of request, in order to ensure a timely and effective response. In addition, it must include a clear and precise description of the personal data in relation to which the data subject wishes to exercise any of the rights.

Any request intended to be processed must be submitted by the data subject or his or her legal representative; therefore, the controller and/or the data processor reserves the right to verify the identity of the data subject by any means.

Applications shall be processed within the time limit set out in the regulation from the date of receipt, irrespective of the means by which they were submitted. If it is not possible to process the application within this time limit, the applicant shall be notified, stating the reasons for the delay and the estimated time to complete the process.

## 17. RELATED COMPANIES AND COMPANIES MANAGED BY CINETPERU

CINETPERU and associated companies, respect your privacy and do not share your data with third parties, with the exception of companies related to the business group to which we belong and subcontractors for the delivery of products and services to the customer. This is done following our instructions and in compliance with this privacy policy.

## 18. CHANGES TO THE PRIVACY POLICY

CINETPERU reserves the right to modify its Privacy Policy for the Protection of Personal Data in the Scope of the Web Portal in order to adapt it to the changes that may be required by the current regulatory framework. If any changes are made to this Policy, the new text will be published on this Website. Users are recommended to periodically access this Privacy Policy, which they will find on this website.

Trujillo 14/09/2023