

Privacy Policy and Personal Data Processing

1 Introduction and Objectives

The universal use of electronic communication networks and services, especially the Internet, and their functionalities, has transformed social and commercial relationships as well as societies' capacity for expression. It has also increased both the quantity and the nature of information to which citizens and companies have easy access. As a result, personal data is increasingly being processed—both in a general sense, for multiple activities of daily personal or professional life, and more specifically, in the context of providing services directly to clients and/or users of all kinds of services. Of particular relevance in this regard are communication services and payment service providers.

Moneteca Pagos, a provider of such services, firmly believes that proper access to and processing of this significant volume of data represents a major opportunity to enrich citizens' lives and contribute to societal development.

Moneteca Pagos respects the fundamental rights and freedoms of individuals, including the fundamental right to the protection of personal data. The need to safeguard this fundamental right is recognized, and within this framework, guidelines for proper conduct are established.

Aware of the importance of earning the trust of its clients and/or users and, more broadly, its stakeholders—by ensuring them control over and value from the personal data processed by Moneteca Pagos (hereinafter referred to as “Data Subjects” as defined in this Policy)—this Moneteca Pagos Privacy and Personal Data Processing Policy has been created to reinforce its commitment to the right to privacy of all individuals whose data is accessed by Moneteca Pagos, directly or indirectly.

Accordingly, this Policy establishes the general guidelines that Moneteca Pagos, as a leading company in its sector and in the development of trust standards in its relationships with individuals, must progressively implement in accordance with applicable legal requirements.

These general guidelines are intended to be further developed into more specific commitments, whether general in nature or tailored to particular situations, taking into account the anticipated or foreseeable challenges in implementing concrete actions that ensure full and effective adherence to the aforementioned guidelines.

For these purposes, the privacy governance model established in Section 9 of this Policy is essential, as it will ensure the fastest, most effective, and efficient implementation of actions that enable compliance with the guidelines set forth herein.

For clarification, this Policy refers specifically to the privacy of natural persons' data. Moneteca Pagos also respects the protection of information and data belonging to legal entities and, in relation to such data, will comply with the applicable national legislation

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2 Scope of Application

This Policy has the status of a corporate policy and applies to Moneteca Pagos SpA which, in its capacity as the parent company, is responsible for establishing the foundations and mechanisms necessary for proper and efficient coordination between this Company and the other companies that make up its group. These will be subject to further development through instruments governing the progressive fulfillment of more specific commitments¹.

3 Principles

In the processing of personal data, Moneteca Pagos will adopt actions aimed at preserving the following basic principles:

- **Principle of lawfulness and fairness**
- **Principle of purpose (purpose limitation)**
- **Principle of proportionality**
- **Principle of data quality**
- **Principle of accountability**
- **Principle of security**
- **Principle of transparency and information**
- **Principle of confidentiality**

3.1. Principle of Lawfulness and Fairness

Moneteca Pagos will adopt the necessary actions to ensure that the personal data it collects, stores, and processes from Data Subjects is handled in a lawful and fair manner.

The processing must comply with the obligations arising from the legal framework applicable to such processing, taking into account its characteristics and geographical scope, as well as the other provisions included in this Policy. In all cases, Moneteca Pagos will pay particular attention to:

- obtaining the consent of the data subject or, where applicable, the existence of any other lawful basis for processing provided for in the applicable legislation;
- the necessity of the processing and its legitimate purpose. Personal data will be collected for legitimate purposes and will not be further processed in a manner

¹ All of the above without prejudice to, or in any way diminishing, the autonomous decision-making capacity that corresponds to each of these companies, in accordance with the corporate interest of each of them and the fiduciary duties that the members of their governing bodies owe to all of their shareholders.

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incompatible with those purposes.

The data controller must be able to demonstrate the lawfulness of the personal data processing it carries out.

3.2. Principle of Purpose

Personal data must be collected for specific, explicit, and lawful purposes. The processing of personal data must be limited to fulfilling these purposes.

In applying this principle, personal data may not be processed for purposes other than those communicated at the time of collection, except when:

- the processing is for purposes compatible with those originally authorized;
- there is a contractual or pre-contractual relationship between the data subject and the data controller that justifies processing the data for a different purpose, provided it falls within the scope of the contract or is consistent with prior negotiations or dealings;
- the data subject provides their consent again; or
- otherwise required by law.

3.3. Principle of Proportionality

The personal data processed must be strictly limited to what is necessary, adequate, and relevant in relation to the purposes of the processing.

Personal data may only be retained for the period of time necessary to fulfill the purposes of the processing, after which it must be deleted or anonymized, without prejudice to any exceptions established by law. Any longer retention period requires legal authorization or the consent of the data subject.

3.4. Principle of Data Quality

Personal data must be accurate, complete, up-to-date, and relevant in relation to its source and the purposes of the processing.

3.5. Principle of Accountability

Those who process personal data will be legally responsible for complying with the principles set forth in this article, as well as with the obligations and duties established by law.

Moneteca Pagos must provide Data Subjects with clear and simple tools and/or procedures to guarantee the proper exercise of their rights, in accordance with Law 21.719, such as:

- Accessing their personal data.
- Rectifying inaccurate or incomplete data.
- Requesting the deletion of their data when it is no longer necessary for the purposes for which it was collected.
- Objecting to the processing of their personal data in certain circumstances.
- Requesting the portability of their data to another data controller.

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Moneteca Pagos must facilitate the exercise of these rights within the timeframes and conditions established by applicable law.

Moneteca Pagos provides its staff, clients, contractors, or any other Data Subject whose personal data is included in the databases and/or information systems owned by Moneteca Pagos entities with communication channels to receive and address requests, inquiries, and complaints from Data Subjects, allowing them to exercise the rights granted to them.

Requests can be sent to the email address compliance@moneteca.cl.

Moneteca Pagos is committed to responding to requests, inquiries, and complaints as promptly as possible within the deadlines established by the applicable regulations at any given time.

3.6. Principle of Security

In the processing of personal data, the data controller must ensure appropriate security standards, protecting data against unauthorized or unlawful processing, as well as against loss, leakage, accidental damage, or destruction. Security measures must be suitable and proportionate to the processing being carried out and to the nature of the data.

At Moneteca Pagos, in any phase of the data processing lifecycle, appropriate technical and organizational measures will be applied to ensure a level of security adequate to the risk to which personal data may be exposed, and in any case, in accordance with the security measures established by the applicable legal framework in each of the countries and/or regions in which it operates, as well as its internal Security policies. If at any time this security is compromised, Moneteca Pagos will act promptly and responsibly.

Moneteca Pagos will exercise particular diligence in analyzing processing activities that may involve a high risk to the rights and freedoms of Data Subjects. Furthermore, Moneteca Pagos will at all times protect the confidential nature of Data Subjects' personal data, in accordance with internal regulations on information classification and processing.

3.7. Principle of Transparency and Information

The data controller must provide the Data Subject with all information necessary for the exercise of the rights established by law, including policies and practices regarding the processing of personal data. This information must also be permanently accessible and available to any Data Subject in a precise, clear, unambiguous, and free manner.

The data controller must adopt appropriate and timely measures to facilitate the Data Subject's access to all information required by law, as well as any other communication related to the processing being carried out.

Moneteca Pagos will take the necessary measures to ensure that Data Subjects are provided with easily accessible and understandable information about the personal data it collects, stores, and processes.

Among other measures, all Data Subjects will be provided with the following information:

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Type of Information Collected

Moneteca Pagos collects different types of personal data, either directly because the information is provided or indirectly through the use of our services or from legitimate external sources.

- **Data provided directly by the user:** such as name, address, phone number, city, etc.
- **Data generated automatically from the use of our services:** location, consumption, feedback on our services, etc.
- **Data from legitimate external sources:** always informing the Data Subject.
- **Information collected legally from publicly accessible sources or whose processing is authorized by law.**

How Information Is Collected

This information is collected in various ways and through different channels. All Data Subjects will be informed about how their data is collected when they access our products, services, or communication channels.

Purpose of Data Collection

Data may be used for different purposes depending on its type. Data Subjects must be informed about the purpose for which their data will be used.

- **Service Provision:** Manage, validate, and execute payment transactions instructed by our clients; register users; facilitate the use of the website and our digital channels.
- **Customer Support:** Respond to inquiries, manage complaints and requests, provide technical assistance, and maintain effective communication with clients.
- **Legal and Regulatory Compliance:** Comply with applicable legal and regulatory obligations, including those related to fraud prevention, personal data protection, consumer protection, financial system regulations, and requirements of competent administrative or judicial authorities.
- **Security and Fraud Prevention:** Ensure the security of our platforms, prevent misuse or fraudulent use of services, detect irregular or unauthorized activities, and protect the integrity of our systems, users, and merchants.
- **Operational Analysis and Improvements:** Conduct statistical studies, segmentation, internal research, and usage behavior analysis to improve services, develop new features, perform testing, and maintain quality and efficiency standards.
- **Marketing and Communications (with prior consent):** Send the Data Subject advertising information, promotions, surveys, events, benefits, or commercial news that may be of interest through the enabled channels. The Data Subject may

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withdraw this consent at any time.

Whenever possible, anonymization or pseudonymization techniques will be applied to avoid direct identification of the Data Subject.

Retention of Personal Data

The period during which we retain personal data varies depending on the nature of the data, the purpose for which it was collected, and the applicable legal or contractual obligations. Data Subjects will be informed of the retention period for their personal data or the criteria to determine it, the method of deletion when applicable, and what happens when users delete their accounts.

In any case, Moneteca Pagos reserves the right to use information collected from Data Subjects in an anonymized form, so that the Data Subject cannot be identified.

Disclosure of Information

Data Subjects will be informed of the category of information to be disclosed, the recipients or categories of recipients, and the purpose of the disclosure.

3.8. Principle of Confidentiality

The data controller and anyone with access to personal data must maintain secrecy or confidentiality regarding such data. The data controller will establish appropriate controls and measures to preserve this secrecy or confidentiality. This duty remains in effect even after the relationship with the Data Subject has ended.

4 Conditions for Consent

Moneteca Pagos will provide Data Subjects with clear and transparent information regarding the use and storage of their personal data, so that they can give free, specific, informed, and unambiguous consent for the processing of their data.

5 International Data Transfers

Information provided by Data Subjects may be transferred internationally to companies and third parties for processing in accordance with the requirements established by the applicable legislation in each country and/or region, as well as relevant international agreements, where the various entities of Moneteca Pagos operate.

In this regard, Moneteca Pagos, whether as Data Controller and/or Data Processor, will protect the rights of its Data Subjects in international transfers of personal data to third countries, always observing applicable security standards and legislation.

Furthermore, Moneteca Pagos foresees the application of Binding Corporate Rules (BCRs) that provide adequate protection guarantees for transfers between companies, which would apply wherever the regulations require them.

6 Privacy of Minors

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Moneteca Pagos expresses its commitment to the right to privacy of minors, the protection of their personal information, and the promotion of responsible use of technology.

7 Privacy in the Supply Chain

Moneteca Pagos, as the Data Controller, will ensure contractually that any supplier acting under its authority and having access to personal data of its Data Subjects may only process such data following its instructions and, in all cases, securely, by adopting the necessary technical and organizational security measures and fully complying with applicable laws and internal regulations.

Thus, the Data Controller will prioritize the selection of suppliers acting as Data Processors when they guarantee compliance with the applicable data protection legislation for the processing entrusted to them and, additionally, with this Policy.

8 Privacy by Design

Moneteca Pagos adheres to the principles of privacy by design and proactive accountability in the development of its products and services, ensuring that data protection requirements are incorporated from their initial conception.

9 Requirements from Competent Authorities

Moneteca Pagos operates under the legal frameworks of the jurisdictions in which it functions, and therefore, in exceptional circumstances and only as expressly provided by national laws, must respond to requests from competent authorities regarding certain information about its clients' and/or users' communications.

Moneteca Pagos implements a strict global procedure that ensures both compliance with our obligations to cooperate with the justice system and competent authorities, and the protection of the Privacy and Freedom of Expression rights of the individuals concerned.

Moneteca Pagos will periodically publish information on the number and types of requests it receives from competent authorities in the countries where it operates.

10 Organization and Responsibilities

To guarantee the data protection rights of the individuals and companies that Moneteca Pagos interacts with, as well as compliance with applicable legal frameworks and this Privacy and Personal Data Processing Policy, it is important that the company allocates appropriate resources for the implementation of this policy.

Moneteca Pagos has established the corresponding organizational structure, the basic framework of which is detailed below:

10.1. Data Protection Officer of Moneteca Pagos

Moneteca Pagos must appoint a Data Protection Officer ("DPO").

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The appointment will take into account the professional qualifications of the candidate, their knowledge and experience in data protection, and their understanding of the corresponding business unit and the organization as a whole.

The DPO of Moneteca Pagos is responsible for personal data protection within the company and reports directly to the Board of Directors of Moneteca Pagos SpA.

The main functions of the Moneteca Pagos DPO are:

- Coordination of data protection within Moneteca Pagos and definition of the compliance program regarding privacy.
- Supervision of compliance with applicable data protection regulations.
- Acting as the point of contact and providing advice on personal data processing to the organization of Moneteca Pagos SpA.
- Implementation and enforcement of privacy and data protection policies, and assessment of the impact of new projects related to data processing.
- Performing the functions generally assigned by applicable legislation (for example, Law No. 21.719 and the provisions established in the European Union's General Data Protection Regulation).
- Providing data protection advice to the business units under their responsibility.
- Supervising compliance with applicable legal requirements and this Privacy Policy within their scope of responsibility.
- Acting as the point of contact with Data Subjects and relevant supervisory authority(ies) in their respective area of activity.

The Moneteca Pagos DPO leads and coordinates the direct responsibility for the privacy compliance program, ensuring its proper implementation across the organization.

10.2. Relationship Structure

Without prejudice to the functions and responsibilities of the Moneteca Pagos DPO, and to ensure the effective implementation of the privacy compliance program, it is deemed appropriate to establish a relationship structure aimed at supporting, coordinating, advising, and proposing lines of action regarding this program and, more broadly, compliance with data protection legal requirements.

In particular, Moneteca Pagos considers it appropriate to establish the following relationship axes (through regular interactions and, in particular, the Committees established for this purpose):

- **Cross-Functional Relationship:** This is based on the premise that Moneteca Pagos operates global business units that are essential, due to their scope of activity, for the

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successful implementation of the privacy compliance program. For this reason, they must maintain a permanent relationship with the DPO. This group includes, among others, the following areas: Security, Legal Services, Technology, Compliance, Corporate Ethics and Sustainability, and Internal Audit.

- **Business Relationship:** Ultimately, the business units are responsible for implementing the privacy compliance program. Therefore, their internal regulations and business processes must always take the program into account. To this end, interfaces will be designated both within Moneteca Pagos SpA and, where appropriate, in business units to ensure proper interaction with the DPO.
- **Inter-Business Unit Relationship:** Coordinated interaction with the DPO will be ensured for monitoring the privacy compliance program and reviewing issues that are transversal across the organization.

11 Training and Awareness

Moneteca Pagos recognizes that the progressive improvement of compliance with applicable legal requirements and internal regulations regarding privacy and personal data protection depends on effectively fostering a culture of knowledge among its employees and participants in the supply chain.

The implementation of this culture can only be achieved through appropriate training and awareness initiatives, which Moneteca Pagos is committed to developing as part of its comprehensive training and communication plans. These initiatives will be continuous, prioritized for employees, and, to the extent possible, extended to third parties interacting with the organization.

12 Monitoring and Control

Moneteca Pagos and each company within its group, in its commitment to supervision and continuous improvement, periodically subjects its personal data processing activities to internal and/or external controls or audits. The purpose of these audits is to verify proper compliance with the applicable legal framework for each entity, as well as with this Policy and the rules and procedures that implement it, determining levels of compliance and recommending corrective measures.

In particular, this Policy may be further developed through regulations that establish the necessary mechanisms for monitoring and controlling its compliance.

For processing activities in which Moneteca Pagos acts as the Data Controller, it may require, through contractual agreements, that the Data Processors it works with implement audit or certification mechanisms to ensure that they provide sufficient guarantees to carry out their processing operations.

13 Internal Audit

Compliance with this Policy by the various areas of the Company will be subject to review

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and supervision by the Internal Audit department, which is authorized to conduct sample audits of the controls established herein whenever it deems appropriate.

14 Review and Amendments

This corporate Policy will be reviewed periodically, taking into account organizational, legal, or business changes that may occur, in order to maintain its relevance, adequacy, and effectiveness.

Any revisions to the Policy, to the extent that they may affect the privacy commitments made by Moneteca Pagos to Data Subjects, will be appropriately disseminated and communicated.

15 Effective Date and Applicability

This Corporate Policy will enter into force on the date of its approval by the Extraordinary or Ordinary Shareholders' Meeting, as applicable.