

Privacy and Personal Data Protection Policy

Institutional personal data protection instrument of DILEXSA S.A.

LEGAL NAME	DILEXSA S.A.
TAX ID (RUC)	0992155736001
VERSION	v2.1
APPROVAL DATE	May 3, 2026
DATA PROTECTION CONTACT	proteccion-datos@dilexsa-tech.com

Unofficial English translation. In case of any discrepancy, the Spanish-language version of this instrument prevails as the legally binding text under Ecuadorian law.

PART I · PUBLIC INSTRUMENT — PRIVACY POLICY

Article 1. Purpose and scope

This Privacy and Personal Data Protection Policy (hereinafter, the “Policy”) sets out the principles, conditions and safeguards under which DILEXSA S.A. processes the personal data of the natural persons with whom it interacts, in compliance with Ecuador’s Organic Law on Personal Data Protection, its General Regulations and the resolutions of the Superintendence of Personal Data Protection.

The Policy applies to all processing of personal data carried out by DILEXSA S.A. as data controller, as well as to actions in which DILEXSA acts as data processor on behalf of its clients. It is a single, general instrument applicable to all data subjects whose personal data is processed by DILEXSA, including personnel, applicants, suppliers, clients and visitors.

Article 2. Identification of the data controller

The party responsible for processing the personal data is:

Legal name	DILEXSA S.A.
Tax ID (RUC)	0992155736001
Registered address	Mapasingue Oeste, Av. Primera #113, Guayaquil — Guayas, Ecuador
Contact channel for personal data matters	proteccion-datos@dilexsa-tech.com

DILEXSA S.A. is not required to appoint a Data Protection Officer, as none of the statutory circumstances giving rise to that obligation apply. Consequently, the content relating to the contact details of a Data Protection Officer does not apply, as expressly provided by the Law.

Article 3. Legal framework

The processing of personal data by DILEXSA is governed by the Constitution of the Republic of Ecuador, the Organic Law on Personal Data Protection, its General Regulations, the resolutions of the Superintendence of Personal Data Protection, and other applicable regulations.

Article 4. Principles governing processing

DILEXSA processes personal data in accordance with the principles established in Article 10 of the Organic Law on Personal Data Protection, namely: lawfulness; fairness; transparency; purpose limitation; relevance and minimization; proportionality of processing; confidentiality; quality and accuracy; storage limitation; data security; proactive and demonstrated accountability; application favorable to the data subject; and independence of oversight.

In particular, DILEXSA processes only the data strictly necessary for the declared purposes (minimization), does not use the data for purposes incompatible with those for which it was collected (purpose limitation), retains the data only for the time necessary (storage limitation), and maintains the ability to demonstrate compliance with the regulations to the Authority and to the data subject (proactive and demonstrated accountability).

Article 5. Definitions

For the correct understanding of this Policy, the following terms shall mean:

Personal data	Data that identifies or makes identifiable a natural person, directly or indirectly.
Data subject	The natural person to whom the personal data belongs.

Processing	Any operation carried out on personal data: collection, recording, storage, use, communication, deletion, among others.
Data controller	The party that decides on the purpose and the processing of the personal data; in this Policy, DILEXSA S.A.
Data processor	The party that processes personal data on behalf of and under the instructions of a controller.
Special-category data	Data that receives reinforced protection, such as sensitive data, biometric data, health data, data of children and adolescents, and data of persons with disabilities.
Transfer or communication	Disclosure or delivery of personal data to a person other than the data subject, the controller or the processor.
Authority	The Superintendence of Personal Data Protection of Ecuador.

Article 6. Processing activities, purposes and legal bases

DILEXSA processes personal data in the activities indicated below, with the purposes and legal bases stated for each, in accordance with Article 7 of the Organic Law on Personal Data Protection:

ACTIVITY	PURPOSE	LEGAL BASIS
Personnel management	Compliance with labor, social security and tax obligations; payroll management; access control; management of the employment relationship	Compliance with a legal obligation (Art. 7, item 2). For biometric data: explicit consent (Art. 7, item 1 and Art. 26)
Supplier management	Management of the contractual relationship and compliance with tax obligations	Contractual obligations (Art. 7, item 5) and legal obligation (Art. 7, item 2)
Client management	Management of the contractual relationship, operational and commercial communication, billing and after-sales	Contractual obligations (Art. 7, item 5) and legal obligation (Art. 7, item 2)
Video surveillance	Safety of people and property on DILEXSA's premises	Legitimate interest (Art. 7, item 8 and Art. 9)
Operational communications	Internal and external communication, document storage and collaboration	Contractual and legal obligations (Art. 7, items 5 and 2)
Client services	Provision of technical services on the systems of end clients	DILEXSA acts as processor; the basis corresponds to the responsible client

Article 7. Categories of personal data and of data subjects

DILEXSA processes identification and contact data, academic and employment data, financial data, images captured by video surveillance, and the content of communications, depending on the activity. The data subjects are personnel and applicants, the natural persons acting on behalf of suppliers and clients, and the persons who enter DILEXSA's premises.

DILEXSA processes one special-category data point: the fingerprint of personnel, used for access control, with the reinforced protection required by the Law (Article 13 of this Policy).

Article 8. Recipients, communications and international transfers

DILEXSA may communicate personal data to public entities where there is a legal obligation, to suppliers that provide services on behalf of DILEXSA under a processing agreement, and to the competent authority when it so requires in a duly substantiated manner and in accordance with the law.

Certain technology tools used by DILEXSA store information on servers located outside Ecuador, which entails international transfers of personal data. DILEXSA applies the safeguards required by data protection regulations for these transfers, in accordance with the legal regime in force on international transfers.

Article 9. Retention periods

DILEXSA retains personal data only for the time necessary to fulfill the purpose for which it was collected. Data protection regulations do not establish a single retention period; this is determined by the purpose of each processing activity and by the applicable legal obligations, including those of a tax and labor nature. Once the applicable period has elapsed, the data is securely deleted.

Article 10. Rights of data subjects

The data subject has the right to access their personal data, to rectify and update it, to request its deletion, to object to processing in the cases provided by law, to data portability, not to be subject to decisions based solely on automated processing that produce legal effects or significantly affect them, and to withdraw consent where this is the basis of processing, without affecting the lawfulness of processing carried out prior to the withdrawal.

DILEXSA will respond to requests to exercise rights within the fifteen (15) day period established by the Law, counted from receipt of the request. DILEXSA may require proportionate verification of the requester's identity in order to protect the data subject's own data.

Article 11. Channel for exercising rights and filing complaints

The data subject exercises their rights by contacting the channel indicated in Article 2 of this Policy. If the data subject considers that their request has not been properly handled, they may file a complaint with DILEXSA through the same channel and, in any case, file a complaint with the Superintendence of Personal Data Protection.

Article 12. Security measures

DILEXSA applies appropriate technical, administrative, physical, organizational and legal measures to protect personal data and ensure its confidentiality, integrity and availability, in accordance with Article 37 of the Law. The detail of these measures and the procedure for acting in the event of security incidents are developed in DILEXSA's internal security instruments.

Article 13. Processing of special-category data

The processing of personnel fingerprints for access control, being special-category data, is carried out on the basis of the employee's explicit consent, in accordance with Article 7, item 1 and Article 26 of the Law. Consent is collected through a specific instrument that clearly specifies its purposes. The employee may withdraw consent at any time, in which case DILEXSA will delete their fingerprint from the system and enable an alternative means of access control.

Article 14. Video surveillance

DILEXSA operates a video surveillance system on its premises for the purpose of ensuring the safety of people and property, on the basis of legitimate interest, in accordance with Articles 7, item 8 and 9 of the Law. At the capture points, DILEXSA posts visible informational signage warning of the existence of the video surveillance, identifying the controller and its contact channel, and indicating the possibility of exercising rights, referring to this Policy for full information. Images are kept only for the time necessary for the security purpose and are then securely deleted, except for any segment that must be retained as evidence of a specific incident.

Article 15. Amendments to the Policy

DILEXSA may amend this Policy when its processing activities, purposes, transfer regime, or applicable regulations change. The current version is the one identified by its version number and date. DILEXSA will make the updated version available through the same means by which it publishes this Policy.

Article 16. Entry into force and approval

This Policy enters into force upon its approval by the Legal Representative of DILEXSA S.A. and remains in force until it is replaced by a subsequent version.

Approved by	Miguel Alcívar García — Legal Representative of DILEXSA S.A.
Version	v2.1
Approval date	May 3, 2026
Signature	_____

PART II · PUBLIC INSTRUMENT — PRIVACY NOTICE

This is the summarized piece that fulfills the duty to inform at the time of data collection. It is inserted into forms, contracts, emails and any point where personal data is collected, and refers to the full Policy.

DILEXSA S.A. (RUC 0992155736001), with registered address in Guayaquil, processes your personal data to manage the corresponding employment, commercial or contractual relationship and to comply with its legal obligations, on the legal basis applicable to each case under Article 7 of the Organic Law on Personal Data Protection. Your data may be communicated to public entities by legal obligation and to suppliers that provide services on behalf of DILEXSA. Some communications are carried out using tools with storage outside Ecuador, with the safeguards required by law. You may exercise your rights of access, rectification, updating, deletion, objection, portability and withdrawal of consent by writing to proteccion-datos@dilexsa-tech.com, and file complaints with the Superintendence of Personal Data Protection. The full information is set out in DILEXSA S.A.'s Privacy and Personal Data Protection Policy, available at <https://dilexsa.com/en/data-protection/>.

For the processing of special-category data (personnel fingerprints), a separate, explicit consent instrument is used, in accordance with Article 13 of the Policy.