

**PROTECTION AND USE OF  
PERSONAL DATA BY RANSA**

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## 1. WHO IS RESPONSIBLE FOR THE PROCESSING OF MY PERSONAL DATA?

RANSA S.A. (hereinafter RANSA), with headquarters at Km 22 Vía a Daule Guayaquil; Guayas; In accordance with the provisions of the Organic Law on the Protection of Personal Data, it is responsible for the processing of the personal data that is the subject of this instrument and makes this policy for the protection and use of personal data available to you, in order to carry out the processing. of your personal data, with the purpose of guaranteeing your right to their protection.

This instrument will be applicable to all processing of personal data of Clients and/or Beneficiary or third parties with whom RANSA establishes or maintains a relationship of offering or providing services, among others.

## 2. HOW DO YOU COLLECT MY PERSONAL DATA?

The data that RANSA will process will be those provided by the Client themselves for the request of products and the maintenance of the contractual relationship, through any channel. In this sense, we obtain their data generated as a result of said relationship, as well as databases. publicly accessible data and finally we obtain your data when it is transmitted to us by other companies that we use to carry out the provision of our services.

When the Client provides data about third parties, these will be processed within the management of the request and for the maintenance of the contractual relationship when it begins. By accepting these conditions on the processing of personal data, you consent to this processing, declare that they are accurate and that you have proceeded to inform these third parties of their content and the corresponding rights that they are entitled to in terms of Data Protection. Notwithstanding the above, RANSA will make every effort to act appropriately in relation to the treatment of said third parties.

Likewise, the Client's personal data may be obtained through third parties, duly legitimized, for example through the relationship and confidentiality agreement existing between RANSA PERÚ and RANSA ECUADOR or companies such as those that can review the credit bureau such as Equifax, among other companies. In all cases we comply by notifying you about the origin of the data in a timely manner, expressly complying with the provisions of the personal data protection standard.

The Client acknowledges that the information provided is complete, correct and updated, and in the event of providing information from third parties, such as but not limited to their beneficiaries, they acknowledge that they previously obtained their consent to share their Personal and sensitive Data with the person responsible.

## 3. WHAT PERSONAL DATA IS BEING PROCESSED?

### 3.1. Non-sensitive Personal Data:

- 3.1.1. Identified data: Such as names, surnames, identification numbers, RUC.
- 3.1.2. Contact information: Such as, for example, email, landline, cell phone, address.
- 3.1.3. Data related to personal characteristics: Such as, for example, sex, marital

status.

- 3.1.4. Data on social circumstances: Such as, for example, housing accommodation characteristics.
- 3.1.5. Academic and professional data: Such as, for example, qualifications, position.
- 3.1.6. Economic and financial data: Such as, for example, credit/debit card number.
- 3.1.7. Contractual information: Such as, data derived from the contracted products and services.

### 3.2. Sensitive Personal Data:

- 3.2.1. Geolocation: Such as, for example, location coordinates.

In general, RANSA will only process the Personal Data of girls, boys and adolescents when their legal representative has given their consent for such processing, it is necessary for the execution of the services or for compliance with a legal obligation and/or for satisfaction. of a legitimate interest of RANSA.

However, in accordance with current regulations, adolescents over fifteen (15) years of age and under eighteen (18) years of age may exercise their rights directly before the person responsible for the personal data base for processing or before the Authority. of Personal Data Protection.

To this end, the person responsible has implemented special actions, measures and provisions, in order to safeguard the right to protection of Personal Data of girls, boys and adolescents.

## 4. HOW AND WHY IS MY PERSONAL DATA BEING PROCESSED?

RANSA will process personal data for the following purposes and bases of legitimacy:

- 4.1.** Based on compliance with contractual obligations.
  - 4.1.1. For the formalization, development and execution of the contracted services: RANSA uses your personal data, among others, to evaluate, select and establish price values in relation to the services and products sold in one of our points of sale, as well as to preparing and issuing quotes, invoices, managing orders and other activities related to the transaction.
  - 4.1.2. For the delivery of merchandise: We use your personal data to deliver the product to you or to a third party that you have authorized, the delivery may be at one of our commercial locations or a point selected by the client. Sometimes to deliver the products we must record your income and receipt of it. When you designate and authorize a third party, we will use their personal data in accordance with this policy.
  - 4.1.3. To carry out the collection process: Sometimes we will use your personal data to inform you about the collection process and send or contact you to organize payments of the expected price. This involves using your banking or credit or debit card information, the use of payment buttons, bank applications, gateways, among others, to perfect the contract for the sale of products.
  - 4.1.4. For the management of queries, problems and complaints: Sometimes we will use your personal data to resolve your doubts and complaints about the services provided. Also to solve tax problems that arise as a result of the business relationship.
- 4.2.** Based on compliance with a legal obligation applicable to RANSA.
  - 4.2.1. For the fulfillment of obligations that correspond to RANSA by legal mandate. Personal data of Clients is used to comply with certain legally established obligations. Among others, RANSA will process Personal Data in order to comply with the obligations established in the regulations relating to: tax laws, commercial code, company law and current regulations on the protection of personal data, among others. and payable to RANSA.
- 4.3.** On the basis of free, informed, unequivocal and specific consent:
  - 4.3.1. For data analysis and profiling. RANSA processes the Customer's Personal Data, the processing of which is explicitly consented to, with the aim that their purchasing experience with RANSA is as Customer-oriented as possible and that RANSA may be able to continue using it to analyze their purchasing behavior. This includes the analysis of purchasing behavior and additionally the risk analysis for the company in case you decide to pay in installments and RANSA must make a decision about the approval and execution of a credit in favor of one of our clients.
  - 4.3.2. To send commercial communications through any channel, including, but not limited to, electronically, in accordance with applicable regulations. RANSA will process your Personal Data to inform and advise you in a personalized way, taking into account your particular interests and needs in RANSA products and services. Thus, RANSA will process the Client's Personal Data to

send commercial communications, related to products and services in the industrial, transport and similar sectors, by any means, including electronically, about personalized offers that respond to their interests. The personalization of commercial communications means that personal data is processed to create customer profiles, according to their interests in products, and in no case are the profiles used to make automated decisions with legal effects for the owner.

4.3.3. To transfer your Personal Data to related Companies. RANSA may transfer the Client's Personal Data to related companies that may be part of the RANSA business group to fulfill the objectives determined in the service provision contract or as its effects.

4.3.4. To transfer Personal Data to third companies. RANSA may transfer the Client's Personal Data to any other entity with which it establishes links of collaboration, cooperation, strategic alliances or commercial partnerships for the effectiveness of contractual relations with the Client for the purpose of risk analysis, as well as for the sending of commercial information related to products and services for the sale of products.

#### 4.4. Based on legitimate interest:

4.4.1. To guarantee the security of the Web services, the information and the network, as well as the normal functioning of the same, RANSA will process your personal data in order to guarantee the security of the information and the network, as well as its normal functioning within digital tools.

4.4.2. For our continuous improvement of services and products, as well as for the improvement in the functionality of our offered services, our operation as an organization, the analysis for the design of our business strategy (financial analysis, costs, marketing, among others), in which RANSA has a legitimate interest to process personal data of Clients.

## 5. WHO CAN ACCESS MY PERSONAL DATA?

RANSA will only share personal data with third parties if there is a legal basis for it or in all those cases in which you have given us your consent. It will be understood that there is a legal basis for making such communications when a legal rule requires communication or it is necessary for the provision of the contracted service.

Among these recipients will be the following:

- Competent public sector entities and control authorities that have the power to request information about your data such as Superintendence of Securities and Insurance Companies, Financial and Economic Analysis Unit, Internal Revenue Service, Judges and Courts, State Attorney General's Office, Police National, Superintendence of Data Protection, among others.
- External auditors in compliance with applicable contractual and legal obligations RANSA.
- Likewise, it is reported that RANSA and other payment service providers, as well as the payment systems themselves and related technological service providers to which the data is transmitted to carry out each transaction, may be obliged by Ecuadorian legislation to facilitate information on monetary transactions to authorities or control bodies.
- To contest and marketing campaign managers, marketing consultants, among others.
- To the other companies that make up our RANSA business group.

If we share your Personal Information, we will ensure that adequate safeguards are in place to protect your personal information in accordance with data protection laws.

Finally, we inform you that RANSA uses the services of third parties to be able to provide the services contracted by the Client, for which said third parties may have to access personal data. These supplier companies may be classified into the following categories: technological and computer service providers, security companies, courier companies, transport services, systems, infrastructure and real estate management and maintenance companies, logistics services, appraisal services, collection management and portfolio recovery on behalf of third parties, payment method service providers, electronic invoicing services, banking or financial entities, legal and tax advisory services, advertising agencies and marketing and communication services as well as services general professionals. The previous relationship is provided as an example, with RANSA being able to use services from companies belonging to other sectors of activity to be able to provide quality services. RANSA will ensure the correct processing of personal data by said service providers.

Although we process your data mainly within Ecuador, in some situations we will send your personal data, some of our service providers are based in the United States, countries of the European Union, among others. This means that we will sometimes send your personal data to these companies in order to carry out all the activities described in this policy. Any transfer of your personal data outside of Ecuador will be carried out in accordance with current regulations and the provisions issued at the time by the Superintendency of Data Protection. Finally, we inform you that RANSA's headquarters are located in Peru.

Any transfer of your personal data outside of Ecuador will be carried out in accordance with current regulations and the provisions issued at the time by the Superintendency

of Data Protection.

## **6. WHAT RIGHTS DO I HAVE OVER MY PERSONAL DATA AND HOW CAN I EXERCISE THEM?**

The Client may exercise the following rights in relation to the processing of their personal data:

- (a) We provide you with more details about our use of your data.
- (b) We provide you with a copy of the personal data that you have provided to us in the LOPDP guidelines.
- (c) We will update any data that has been modified or changed and will rectify any inaccuracies in the personal data we process in accordance with the LOPDP guidelines.
- (d) We delete any personal data that we no longer have a legal basis to use.
- (e) When the treatment is based on consent, withdraw your consent so that we stop carrying out that specific treatment
- (f) Oppose any processing based on legitimate interest when 1) Fundamental rights and freedoms of third parties are not affected, the law allows it and it is not public information, of public interest or whose processing is ordered by law. 2) The processing of personal data is intended for direct marketing; The interested party will have the right to object at all times to the processing of personal data that concerns him or her, including the creation of profiles; in which case the personal data will no longer be processed for these purposes. 3) When your consent is not necessary for the treatment as a consequence of the concurrence of a legitimate interest, provided for in article 7, and it is justified in a specific personal situation of the Client, provided that a law does not provide otherwise, Unless our reasons for carrying out such processing outweigh any harm to your data protection rights.
- (g) Suspend the processing of your data while in the following situations: 1) When the Client disputes the accuracy of the personal data, while the data controller verifies its accuracy; 2) The processing is unlawful and the interested party opposes the deletion of the personal data and requests instead the limitation of its use; 3) The controller no longer needs the personal data for the purposes of the processing, but the interested party needs it for the formulation, exercise or defense of claims; and, 4) When the interested party has opposed the processing under article 31 of this LOPDP, while it is verified whether the legitimate reasons of the person responsible prevail over those of the interested party.
- (h) The portability of your data in a compatible, updated, structured, common, interoperable and machine-readable format, preserving its characteristics; or to transmit them to other people responsible in the guidelines of the LOPDP
- (i) Not be subject to fully or partially automated decisions, including profiling, that produce legal effects on him or that violate his fundamental rights and freedoms.

The exercise of these rights is subject to certain exceptions, in some cases established in the Organic Law on the Protection of Personal Data, to safeguard the public interest (e.g., prevent or detect an illegal act) and the interests of RANSA. If you exercise any



of these rights, the legitimacy of the request will be verified and you will receive a response within up to fifteen (15) days.

If you are not satisfied with the use that is made of your personal information or the response you have received when exercising your rights, you have the right to file a complaint with the Personal Data Protection Authority, through the channels that it enables to The effect

Likewise, you can request the revocation of the consent granted for the processing of your data.

To exercise the aforementioned rights or to raise any question regarding the processing of your personal data, you should contact RANSA, by request addressed to the Personal Data Protection Delegate, at RANSA's headquarters, located at Km 22 Vía a Daule, in front of Unilever (Pingüino Plant), Guayaquil; Guayas, as well as by e-mail with proof of your identity and addressed to [dpoec@ransa.net](mailto:dpoec@ransa.net).

## **7. HOW DO YOU PROTECT MY PERSONAL DATA?**

Because RANSA respects your privacy and values your trust, the only people we provide with access to your personal data are those who need to use it in order to provide you with our products and/or services, or to carry out carry out other activities described in this Personal Data Protection Notice.

We use technical, organizational, administrative and legal security measures to protect the security, as well as the confidentiality, integrity, and availability of your personal data. These measures have been implemented to protect your Personal Information against unauthorized access, disclosure, use and modification and are reviewed and tested periodically.

Despite this, and given that the Internet is not a 100% secure environment, we cannot guarantee or warrant the security of any information you provide to us. We cannot and do not guarantee the absolute security of communications to or from our websites or applications and digital tools, or that data transmitted or stored on or through them, is or will be completely secure against loss, misuse or unauthorized access by third parties.

## **8. WHO CONTROLS OR SUPERVISES ITS COMPLIANCE?**

The Client may file a claim with the Data Protection Authority through the means it has enabled for this purpose.

## **9. HOW LONG WILL WE KEEP YOUR DATA?**

RANSA considers different retention periods depending on the type of personal data processing involved and the regulation that regulates it.

The personal data processed will be kept as long as they are necessary for the offer or provision of the service, to satisfy any of the processing purposes indicated in this document or as long as the Client does not withdraw their consent, when the latter occurs, the data will be deleted, which implies its blocking, unless there is a legal obligation to preserve it.

To determine the period based on the legal obligation of conservation, by way of example, but not exhaustive or limiting, it may be established, for example:

The data you give us for billing management must be kept for at least 7 years according to the Internal Tax Regime Law.

Once these periods have elapsed, the processing will cease and the procedure will be carried out in accordance with those established in the Organic Law on the Protection of Personal Data.

## 10. WHEN IS THIS POLICY UPDATED?

To consult any modification to this Comprehensive Privacy Notice, we recommend that you frequently visit our website <https://www.ransa.biz/ecuador/> in the "The Company" section, "Privacy Notice" section.

Last updated: June de 2024.

If you are not interested in receiving communications with offers of products and services from RANSA, you can withdraw your consent through the previously indicated means.

## 11. ACCEPTANCE

By filling in the forms, checking the box "I accept the Privacy Policy" and clicking to send the data and/or join the groups or communities of social network applications, and/or by sending e-mails to the Company through the accounts provided for this purpose, the Customer declares to have read and expressly accepted this Privacy Policy, and gives his unequivocal and express consent to the processing of his personal data in accordance with the purposes indicated.

## 12. CHANGE CONTROL

Revision	Section/Paragraph Modified	Actual Change	Date
1	N/A	Initial Edition of the Document.	June/2024

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