

## **PERSONAL DATA TREATMENT POLICY**

### **1. Introduction:**

In compliance with regulations aimed at regulating the treatment of personal data and promoting the respect for the rights of the data subject (the "Data Subject"), Qantto, LLC, LLC adopts the following personal data treatment policy (the "Policy"), which is mandatory for all activities carried out by Qantto, LLC, involving the processing of personal data by its administrators, employees, and collaborators. This policy specifically addresses the handling of acceptance requests, inquiries, and requests related to the treatment of this type of information.

### **2. Purpose:**

Qantto, LLC carries out operations that require the collection of personal data from individuals and legal entities, with whom Qantto, LLC maintains various contractual and/or commercial relationships. Therefore, the collection and processing (the "Processing") of such information regarding all individuals, such as customers, suppliers, contractors, as well as employees and individuals undergoing any type of contractual relationship with Qantto, LLC, is necessary to execute its social, administrative, and commercial activities in the most appropriate manner. Under legal guidelines and as determined by the applicable laws, particularly Law 1581 of 2012, National Decree No. 1377 of 2013, and other regulations that modify, complement, or repeal them, Qantto, LLC may modify this policy as necessary.

### **3. Definitions:**

- Authorization: the prior, express, and informed consent of the Data Subject to carry out the processing of personal data.
- Personal data: any information related or that can be associated with one or more identified or identifiable natural persons.
- Private data: data of an intimate or reserved nature that is only relevant to the Data Subject.
- Semi-private data: data that is not of an intimate, reserved, or public nature and may be of interest not only to the Data Subject but also to a certain sector, individuals, or society in general, such as financial and credit data.
- Public data: data that is not semi-private, private, or sensitive. Public data includes, among others, data related to the civil status of individuals, their profession or occupation, and their status as merchants or public servants. Public data may be contained in public records, official documents, gazettes and official bulletins, and duly executed judicial decisions that are not subject to confidentiality.
- Sensitive data: data that affects the privacy of the Data Subject or whose misuse could lead to discrimination, such as data revealing racial or ethnic origin, political orientation, religious or philosophical beliefs, membership in trade unions, social organizations, human rights organizations, or promotion of the interests of any political party or guaranteeing the rights and guarantees of opposition political parties, as well as data relating to health, sexual life, and biometric data.
- Data Controller: a natural or legal person, public or private, who, either alone or jointly with others, decides on the database and/or the processing of data.

- Data Processor: a natural or legal person, public or private, who, either alone or jointly with others, processes personal data on behalf of the Data Controller.
- Data Subject: a natural person whose personal data is subject to processing.
- Processing: any operation or set of operations performed on personal data, such as collection, storage, use, circulation, or deletion.
- Transfer: occurs when the Data Controller and/or Data Processor of personal data, located in Colombia, sends information or personal data to a recipient who is, in turn, a data controller and is located inside or outside the country.
- Transmission: the processing of personal data involving the communication of such data within or outside the territory of the Republic of Colombia when it has the purpose of processing by the Data Processor on behalf of the Data Controller.

#### **4. Principles:**

- Principle of legality: the processing of personal data is a regulated activity that must comply with the provisions of Law 1581 of 2012, Decree 1377 of 2013, and other regulations that develop them.
- Principle of purpose: the processing of personal data must serve a legitimate purpose in accordance with the constitution and the law, which must be informed to the Data Subject.
- Principle of freedom: the processing of personal data can only be carried out with the prior, express, and informed consent of the Data Subject. Personal data cannot be obtained or disclosed without prior authorization, or in the absence of a legal or judicial mandate that exempts consent.
- Principle of truth or quality: the information subject to processing must be truthful, complete, accurate, updated, verifiable, and understandable. The processing of partial, incomplete, fragmented, or misleading data is prohibited.
- Principle of transparency: the Data Subject's right to obtain information from the Data Controller or Data Processor, at any time and without restrictions, about the existence of data concerning them, must be guaranteed during processing.
- Principle of restricted access and circulation: the processing is subject to limits arising from the nature of personal data, the provisions of the law, and the constitution. In this regard, the processing can only be carried out by persons authorized by the Data Subject and/or by those provided for by law. Personal data, except for public information, cannot be available on the internet or other mass communication or dissemination media, unless access is technically controlled to provide restricted knowledge only to the Data Subjects or authorized third parties under the law.
- Principle of data temporality: once the purpose for which the personal data was collected and/or processed has been fulfilled, the Data Controller or Data Processor will cease its use.
- Principle of security: personal data processed by the Data Controller or Data Processor must be handled with the technical, human, and administrative measures necessary to provide security to the records, preventing their alteration, loss, consultation, use, or unauthorized or fraudulent access.
- Principle of confidentiality: all individuals involved in the processing of personal data that is not of a public nature are obliged to guarantee the confidentiality of the

information, even after their relationship with any of the tasks involving the processing has ended, and may only supply or communicate personal data when it corresponds to the development of activities authorized by law and under the terms of the same.

- Duty of information: Qantto, LLC will inform the Data Subject of their personal data, as well as the Data Controllers and Data Processors, of the data protection regime adopted, as well as the purpose and other principles governing the processing of such data. Furthermore, it will inform about the existence of personal data databases that it keeps, the rights, and the exercise of habeas data by the Data Subjects, proceeding to register as required by law.

#### **5. Processing:**

The information requested by Qantto, LLC from the Data Subject will have the primary purpose of updating the databases and tools available to Qantto, LLC for the development of its activities and the commercial and/or contractual relationship with the Data Subjects, who must grant their consent, prior, free, and voluntary, through any means, as long as it can be consulted in the future.

#### **6. Exclusions:**

It is important to clarify that such authorization will not be necessary when it concerns:

- Information required by a public or administrative entity.
- Processing for historical, statistical, or scientific purposes.
- Data of a public nature.
- Data related to the civil registry of individuals.
- Cases of medical or health emergencies.

#### **7. Means**

The processing of personal data may be carried out through physical, automated, or digital means, depending on the type and form of personal information collection.

#### **8. Other Purposes**

In addition to the purposes stated in Chapter Two, Qantto, LLC may also process personal data for the following purposes:

- Manage procedures (requests, complaints, claims, and inquiries) and conduct satisfaction surveys for Qantto, LLC's clients and business partners.
- Exercise the right to adequately know the Data Subject with whom Qantto, LLC intends to establish relationships, provide services, and assess present or future risks related to those relationships and services.
- Use the logos and/or names of clients on the website to showcase their experience and reputation resulting from work carried out by Qantto, LLC. This is solely for informational purposes to indicate that they contracted a service or product from the company.

- Conduct marketing activities, customer service, brand activation events, prizes, and promotions, directly or through third parties resulting from commercial alliances or any other link.
- The collected information may also be used by third parties for commercial purposes or database purposes, among other uses.
- Carry out relevant actions for the development of pre-contractual, contractual, and post-contractual stages with contractors, suppliers, and employees.
- Disclose, transfer, and/or transmit personal data within and outside the country to Qantto, LLC's parent or subsidiary companies or third parties due to a contract, law, or legitimate relationship that requires it or for implementing cloud storage or remote server services.
- Obtain, store, and process all information provided by Data Subjects in one or several databases in the format that is deemed most convenient.
- Perform all tax, accounting, fiscal, and billing management.
- Data collected or stored regarding Qantto, LLC employees will have the following purposes:

1. Execute the employment contract.
2. Fulfill the employer's labor obligations, such as:
  1. Affiliation to the social security integral system and payment of contributions.
  2. Affiliation to the compensation fund and payment of parafiscal contributions.
  3. Ensure the safety and health of employees at the workplace, in accordance with applicable occupational health and safety regulations.
  4. Withhold taxes according to the provisions of applicable tax laws and make payments to the DIAN for the amounts withheld.
  5. Issue employment, income, and withholding certificates requested by the employee.
  6. Provide information required by a national entity or authority that requires personal data in accordance with current regulations.
  7. Make necessary payroll payments as directed by the employee.
3. For the contracting of life insurance and medical expenses or to grant any other fringe benefit derived from the employment relationship with the employer.
4. To notify family members in case of emergencies that occur during work hours, on the employer's premises, or while performing work-related duties outside the premises.
5. Create identification cards and access to the employer's premises.
6. Maintain and safeguard the safety of the employer's personnel and property.
7. Any other activity related to the employment relationship between the employer and its employees, necessary for the normal development of said relationship. After the employment contract between the parties has terminated, the employer will continue processing the personal data received to maintain historical and/or statistical information regarding compliance with

its legal obligations, particularly labor-related, and exercise its right of defense if necessary.

## **9. Transfers and International Transmissions of Personal Data**

The transfer of personal data to third countries will be subject to the same authorization granted by the Data Subject for the processing of such data. In any case, Qantto, LLC will ensure compliance with the standards established by the Superintendence of Industry and Commerce if required.

## **10. Data Subject's Rights**

The rights of Data Subjects regarding the collected personal data will be those established in Article 8 of Law 1581 of 2012:

- Know, update, and rectify their personal data in front of the data controllers or data processors. This right may be exercised regarding partial, inaccurate, incomplete, fractional data, data that induces error, or data whose processing is expressly prohibited or unauthorized.
- Request evidence of the authorization granted to the data controller unless expressly exempted as a requirement for processing, in accordance with the provisions of Article 10 of this law.
- Be informed by the data controller or data processor, upon request, about the use given to their personal data.
- Lodge complaints before the Superintendence of Industry and Commerce for violations of this law and other regulations that modify, add, or complement it.
- Revoke the authorization and/or request the deletion of the data when the principles, rights, and constitutional and legal guarantees are not respected in the processing. The revocation and/or deletion will proceed when the Superintendence of Industry and Commerce has determined that the data controller or data processor has engaged in conduct contrary to this law and the constitution.

## **11. Area Responsible for Personal Data Processing**

The departments responsible for handling matters related to the processing of personal data will be the XXXXX department of Qantto, LLC, which can be contacted as follows:

- Qantto, LLC
- Address: 651 N Broad St. Suite 201. Middletown, DE 19709. United States
- Phone: (57) 3133846633
- Email: h@qantto.io

## **12. Authorization for Data Processing**

Qantto, LLC must obtain prior, express, and informed authorization from the Data Subject to collect and process their personal data, except for exclusions outlined in this chapter. The Data Subject must be clearly and expressly informed of the following in order to grant authorization:

- The purposes for which their personal data will be processed.

- The optional nature of responding to questions related to sensitive data or data concerning girls, boys, and adolescents.
- Their rights as Data Subjects.
- The identification, physical or electronic address of Qantto, LLC.

### **13. Authorization for Processing Sensitive Data**

When collecting sensitive data, the following requirements must be met:

- The authorization must be explicit.
- The Data Subject must be informed that they are not obligated to authorize the processing of such information.
- The Data Subject must be explicitly and priorly informed of which data will be subject to processing, its sensitivity, and the purpose for which it will be used.

### **14. Authorization for Processing Data of Children and Adolescents**

When collecting and processing data of children and adolescents, the following requirements must be met:

- Authorization must be given by individuals authorized to legally represent them.
- The Data Subject must be informed that responding to questions about their data is optional.

### **15. Biometric Data - Surveillance Systems:**

Qantto, LLC utilizes various surveillance means, such as video or monitoring, in its offices, which are notified through visible notices. Qantto, LLC will use the collected information solely for the purpose of protecting the integrity of its personnel, visitors, clients, assets, and facilities. The Data Subject understands and accepts this purpose and consequently its use. This information may be used as evidence in any type of proceedings before any authority and organization.

### **16. Applicable Law and Jurisdiction:**

You accept that these Terms of Use will be governed and interpreted in accordance with the laws of the Republic of Colombia. You agree that all legal proceedings arising from or related to these Terms of Use or the Service must be brought before the Colombian jurisdiction, and you expressly submit to the exclusive jurisdiction of such courts and consent to extraterritorial service of process.

### **17. Validity:**

This policy was approved after the issuance of the regulations related to habeas data, modified in accordance with the regulatory provisions issued in 2015 and 2016 and published on the website qantto.io.

The validity of the database will be the reasonable and necessary time to fulfill the purposes of the processing, considering the provisions of Article 11 of Decree 1377 of 2013.