

VYRTIUM INTERNATIONAL PRIVACY POLICY AND PERSONAL DATA PROCESSING.

1. **SCOPE:** This policy applies to the processing of personal data collected by VYRTIUM through its websites, mobile applications, digital platforms, customer service channels and contact points, as well as in online or offline forms. It also covers information collected through applications operated on third-party sites or platforms, as long as it is processed directly by VYRTIUM.

Data collected directly by VYRTIUM is protected under this policy.

2. **DATA CONTROLLER:** Vyrrium, with address at Calle 99 # 49 - 50. Office 702. CENTUM Building. Bogotá. Colombia, is responsible for the processing of personal data collected through this website and other related digital channels.

For any matter related to this policy, you can contact our Data Protection Officer (DPO) at the email address: aplicaciones@vyrrium.com

3. **TYPES OF INFORMATION WE OBTAIN:** We collect the following types of personal data:

- First and last name
- Email address
- Phone number
- Shipping address
- Payment information (processed through secure platforms)
- Product and service preferences
- IP address, device identifiers, and browsing data (cookies)
- Any other information voluntarily provided for the provision of our services.

We do not collect sensitive personal data unless strictly necessary and with your explicit consent.

4. **HOW WE OBTAIN YOUR INFORMATION:** We collect your personal data through various sources and means, including:

- Directly from you, when you register on our platforms, request products or services, participate in surveys, forums or other interactive activities, or when you communicate with us through our digital, telephone or physical channels. This information can be provided through writing, voice or other means available on the devices you use.
- Through automated technologies, such as cookies, tracking pixels, tags, SDKs (software development kits), APIs (application programming interfaces) and web beacons. These technologies are used when browsing our sites or using our applications, including on third-party platforms, whether you are registered or not.

- Analysis and monitoring tools, which allow us to record usage patterns, performance, approximate location and browsing behavior, in order to improve the user experience and optimize our services.
- Authorized external sources, such as identity verification services, address validation or other trusted providers, which complement or validate the information you have provided to us. When required by law, we ensure that we have your authorization or that of the third party to receive such data.

5. **PURPOSE OF DATA PROCESSING.** Your personal data will be processed by VYRTIUM and, when necessary, by authorized third parties on commission, for the following purposes:

a) Contractual execution:

Process orders for products or services.

Manage your registration and authentication as a user.

Provide assistance, technical support or attention related to the products and services acquired.

b) Legal compliance:

Respond to legal or judicial requirements.

Comply with fiscal, commercial, accounting and record keeping obligations.

c) Legitimate interest:

Prevent fraud, misuse and protect the security of the site and users.

Improve the user experience, as well as the design, functionality and quality of our digital services.

Conduct internal analysis and market studies to optimize operations and business strategies.

d) Express consent:

Send commercial or promotional communications about our own products or those of third parties, if you authorize it.

Use non-essential cookies and technologies to personalize your browsing.

Develop automated profiles based on your usage behavior, browsing and preferences, for personalized marketing purposes.

e) Operational and technical management:

Operate, maintain, develop and improve our websites, applications, products, services and systems.

Conduct satisfaction surveys, analytical measurements, statistics and functionality tests.

Detect, investigate and prevent activities that may violate our policies or be illegal.

6. LEGAL BASIS FOR PROCESSING: The processing of your personal data is based on:

- Your prior express and informed consent
- The execution of a purchase/sale contract for products or services.
- Compliance with legal obligations.

7. RIGHTS OF DATA SUBJECTS: VYRTIUM provides you with the possibility to exercise various controls and decisions about the collection, use and processing of your personal information, in compliance with applicable legislation. Your options include:

- Access, correct, update or delete your registration account.
- Modify your newsletter, notification or commercial communication subscription preferences.
- Decide if you want to receive offers and promotions about our products and services, or from third parties with whom we have commercial relationships, when you have authorized it.
- Manage the use of cookies and similar technologies through the configuration panel or the "Manage cookie settings" option available on our sites.
- Control interest-based advertising through the opt-out mechanisms enabled in your browser, device.
- Request the removal of your personal information from public forums or interactive spaces managed by VYRTIUM.
- Request access to, rectification or deletion of the personal data we hold about you.
- Limit, when possible, the use of your information for statistical, advertising or profiling purposes.

You can exercise these controls by sending a request to [privacy email] or by postal mail to the address indicated in point 1.

- The configuration options available on our platforms.
- The links included in our electronic communications.

Note: In certain cases, the lack of authorization to process your personal information may prevent us from providing certain services or functionalities. If data collection is mandatory for a specific purpose, you will be clearly informed so that you can make an informed decision.

You also have the right to file a complaint with the supervisory authority in your country.

8. DATA TRANSFERS: Your data will not be shared with third parties, except:

- Technology service providers (hosting, payment processing) under confidentiality agreements.
- Legal obligations or judicial requirements of the countries where we operate.

Your data may be transferred outside the state of its owner, only if adequate protection measures are applied, such as:

- Contractual clauses approved by the data subject
- Countries recognized with an adequate level of protection.
- Explicit consent of the data subject

9. **DATA RETENTION.** We retain your data for:

- The time necessary to fulfill the purposes of the processing
- The mandatory legal period to comply with accounting, tax or contractual regulations
- Until you request its deletion, when there is no legal obligation to retain it

DATA SECURITY: At VYRTIUM we value the security, confidentiality and integrity of your personal information. Therefore, we implement reasonable and proportionate technical, administrative and physical measures to the level of risk, in order to protect your data against unauthorized access, loss, alteration, disclosure or misuse.

These measures include:

- Encryption of data in transit and at rest.
- Access and authentication controls.
- Periodic monitoring and review of vulnerabilities.
- Internal privacy and confidentiality policies.
- Security incident response protocols.

We regularly review our security procedures and adopt new technologies or practices when appropriate.

10. **USE OF COOKIES AND TRACKING TECHNOLOGIES:** We use our own and third-party cookies to improve your browsing experience, offer personalized content and analyze activity on the site.
11. **EXPRESS CONSENT** By registering on our site and accepting this Privacy Policy through the corresponding form, you grant your free, specific, informed and unequivocal consent for the processing of your data. You may withdraw your consent at any time through the indicated channels.
12. **MODIFICATIONS TO THIS POLICY:** We reserve the right to modify this Privacy Policy to adapt it to regulatory changes or new business practices. In case of substantial modifications, we will notify you through the website or by email.