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PURPOSE

Through this policy, the criteria and procedures on the use, collection, handling, treatment, processing, exchange and transfer of personal data are established. Likewise, the obligations that the Controllers are under to process personal data.

SCOPE

This policy is applicable to the Grupo STT corporation, collaborators, clients and suppliers, for the processing of personal data collected and managed by the Grupo STT corporation.

RESPONSIBILITY AND AUTHORITY

It is the responsibility of the Legal Director:

- Review and approve possible modifications or updates to this document.
- Ensure that this document is communicated to interested and involved parties

It is the responsibility of the Corporation:


- Follow the guidelines described in this document.

DESCRIPTION

We recognize the importance of the security, privacy and confidentiality of personal information. This manual will apply to all databases compiled by Grupo STT corporation (hereinafter, "STT"), and contains all information related to our Privacy Policies and data protection.

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2. Definitions and Rights established by Law
3. Standards
4. Authorization
5. Notice of Privacy
6. Obligations of STT Group corporation in relation to the Processing of Personal Data
7. Acceptance of this Privacy Policy


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9. Information and personal data we obtain
10. Purposes of the processing of personal data
11. What personal data will we use for these purposes?
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14. Protection, security and confidentiality of information and personal data
15. Procedure to exercise the rights of the data subjects
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17. The use of tracking technologies on our website through Cookies
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1. About Us

1.1 STT GROUP identifies a group of companies called:

STT GROUP LATIN AMERICAN, SA a corporation incorporated and existing in accordance with the Laws of the Republic of Costa Rica, STT GROUP DE CR, SA a corporation incorporated and existing in accordance with the laws of the Republic of Costa Rica, SERVICE TOTAL TALENT, SA, a corporation incorporated and existing in accordance with the laws of the Republic of Costa Rica, STT CENTROAMERICA, SA, a corporation incorporated and existing in accordance with the laws of the Republic of Costa Rica, PAYROLL OUTSOURCING, SA, a corporation incorporated and existing in accordance with the laws of the Republic of Costa Rica, INFORMATION TECHNOLOGY OUTSOURCING IN CLOUD SA, a corporation incorporated and existing in accordance with the laws of the Republic of Costa Rica, GRUPO STT PANAMÁ, SA a corporation anonymous constituted and existing in accordance with the laws of the Republic of Panama; STT SURAMERICA, SA, a public limited company constituted and existing in accordance with the laws of the Republic of Panama, GRUPO STT, SA also known as ENCUENTRE TU TRABAJO, SA a public limited company constituted and existing in accordance with the laws of the Republic of Guatemala , STT GROUP GUATEMALA, SA, a public limited company constituted and existing in accordance with the laws of the Republic of Guatemala, STT GROUP DE EL SALVADOR, SA DE CV, a public limited company


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constituted and existing in accordance with the laws of the Republic of Savior; GRUPO STT EL SALVADOR, SA DE CV, a corporation incorporated and existing in accordance with the laws of the Republic of El Salvador, STT GROUP DE HONDURAS, SA DE CV, a corporation incorporated and existing in accordance with the laws of the Republic of Honduras; STT GROUP DE LA REPÚBLICA DOMINICANA, SRL a limited liability company constituted and existing in accordance with the laws of the Dominican Republic; STT HOLDING, LIMITED. a company incorporated and existing under the laws of Jamaica, STT OF AMERICA, LLC. a company incorporated and existing under the laws of the State of Florida of the United States of America; SUPPLYING TOTAL TALENT MEXICO, SA DE CV, a corporation incorporated and existing in accordance with the laws of the United Mexican States, STT GROUP SUCURSAL COLOMBIA SA, a branch incorporated and existing in accordance with the laws of Colombia, STT GROUP DE NICARAGUA SA , a corporation incorporated and existing in accordance with the laws of Nicaragua, SUPPLYING TOTAL TALENT SOCIEDAD ANÓNIMA, a corporation incorporated and existing in accordance with the laws of Nicaragua, GLOBAL CONNECTIONS SOCIEDAD ANÓNIMA, a corporation incorporated and existing in accordance with the laws of Nicaragua , STT GROUP CHILE SPA, a public limited company incorporated and existing in accordance with the laws of Chile; SUPPLYING TOTAL TALENT EST SPA, a corporation incorporated and existing in accordance with the laws of Chile, GRUPO STT PERU, SAC, a corporation incorporated and existing in accordance with the laws of Peru, and TOTAL TALENT ECUADOR TOTAECUA SA, a corporation incorporated and existing in accordance with the laws of Ecuador.

2. Definitions and Rights established by Law

2.1 Definitions

- I. **Biometric Data:** in relation to an individual, means any information relating to the physical, physiological or behavioral characteristics of that individual, which allows the identification of the individual
- II. **Commissioner:** means the office of Information Commissioner
- III. **Court:** Means the Supreme Court
- IV. **data controller representative:** means a person or other entity appointed for the purposes
- V. **Data Processor:** in relation to personal data, means any person, other than an employee of the data controller, who processes the data on behalf of the data controller
- VI. **Data protection standards:** means the data protection standards as set out in the Data Privacy Act, 2020 and reference to any of those standards by number means the standard as numbered in the Act
- VII. **Data Subject:** means a named or otherwise identifiable individual who is the subject of personal data, and in determining whether an individual is identifiable account shall be taken of all means used or reasonably likely to be used by the data controller or any other person to identify the individual


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- VIII. **good practice:** means such practice as appears to the Commissioner to be desirable having regard to the interests of data subjects and others
- IX. **Minor:** in relation to an individual means an individual under the age of eighteen years
- X. **Personal Data:** Means information relating to a living individual or an individual who has been deceased for less than thirty years
- XI. **Process:** in relation to information or personal data means obtaining, recording or storing the information or personal data, or carrying out any operation or set of operations (whether or not by automated means) on the information or data
- XII. **Sensitive Personal Data:** means personal data consisting on genetic data or biometric data, filiation or racial or ethnic origin, political opinions, philosophical beliefs, religious beliefs or other beliefs of a similar nature, membership in any trade union, physical or mental health or condition, sex life, the alleged commission of any offense alleged to have been committed by the data subject.

2.2. Rights of the data subjects established by Law

- I. **Right of access to personal data:** data subjects have the right to be informed by the data controller, free of charge, whether personal data of which that individual is the data subject are being processed by or on behalf of that data controller, in accordance with the Data Privacy Act, 2020.
- II. **Right to consent to processing:** when required by law, means any informed, specific, unequivocal, freely given, expression of will by which the data subject agrees to the processing of that data subject's personal data
- III. **Right to prevent processing:** individuals are entitled at any time, by notice in writing to the data controller, to require the data controller, within a period which is reasonable in the circumstances, to cease or not to begin, processing, or processing for a specified purpose or in a specified manner, any personal data in respect of which the individual is the data subject.
- IV. **Rights in relation to automated decision taking:** Individuals are entitled at any time, by notice in writing to the data controller, to require the data controller to ensure that no decision to which this The Data Privacy Act, 2020 applies is based solely on the processing, by automatic means
- V. **Rectification of inaccuracies, etc:** An individual may in writing to a data controller request that the data controller rectify any inaccuracy in any personal data in the possession or control of the data controller; and of which the individual is the data subject.

Once the data subjects request access and information about personal data, STT will respond within a period of up to 30 (thirty) days after receiving the request, in compliance with the obligations on the The Data Privacy Act, 2020.

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➤ All requests and requests must be sent to the email: privacidadinformacion@grupostt.com

3. Standards


The Standards listed below are the guidelines that must be respected by the STT Group Corporation in the processes of collection, storage, use and processing of personal data.

- I. Personal data shall be processed fairly and lawfully
- II. Personal data shall be obtained only for one or more specified and lawful purposes, and shall not be further processed in any manner incompatible with those purposes
- III. personal data shall be adequate, relevant, and limited to what is necessary for the purposes for which they are processed
- IV. personal data shall be accurate
- V. personal data processed for any purpose shall not be kept for longer than is necessary for that purpose and the disposal of personal data by a data controller shall be in accordance with regulations made by the Data Privacy Act, 2020
- VI. personal data shall be processed in accordance with the rights of data subjects under the Data Privacy Act, 2020
- VII. Appropriate technical and organizational measures shall be taken against unauthorized or unlawful processing of personal data and against accidental loss or destruction of, or damage to, personal data, and to ensure that the Commissioner is notified, without any undue delay, of any breach of the data controller's security measures which affect or may affect any personal data.

4. Authorization.

The processing of personal data by the STT Group corporation requires free, prior, express and informed consent from the data subject. The STT Group corporation, in its capacity as responsible for the processing of personal data, has provided the necessary mechanisms to obtain the authorization of the data subjects, guaranteeing in all cases that the granting of said authorization is possible.

The STT Group corporation will use all appropriate and necessary mechanisms in order to maintain a record of when and how authorization was obtained from the data subjects of the personal data for their processing.


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For all databases indicated in the scope of this document, employees, suppliers, contractors and clients and general third parties with whom the Company has a commercial relationship, must comply with the following provisions:

- a. Only personal data that is strictly necessary for the purpose to which it is required may be processed, in accordance with the objectives defined in the relevant processes of the Grupo STT corporation.
- b. Personal data may not be collected without due authorization from the data subject, except when it involves public data.
- c. The collection of personal data through practices such as deception or fraud is expressly prohibited.
- d. If it is not possible to make this personal data processing policy available to the data subjects, they must be informed by means of a privacy notice, at the time of collecting the information, about the existence of this policy, the manner to access it, the purpose for which your data will be processed and the rights you have as the data subjects regarding the ability to know, update, rectify and delete data, in such a way that they satisfy the purposes of the treatment.
- e. The necessary controls must be included so that personal data collected by employees and contractors is true, complete, accurate, up-to-date, verifiable, understandable and not misleading.
- f. The personal information that is collected must have the technical, human and administrative measures that are necessary to provide security to the records, avoiding their adulteration, loss, consultation, use or unauthorized or fraudulent access.
- g. All employees, suppliers, contractors and clients are obliged to guarantee the confidentiality of the personal information collected, except for public data, even after the relationship with the STT Group corporation has ended. Therefore, the implementation of controls that allow compliance must be guaranteed.

5. Notice of Privacy.

The privacy notice is the physical or electronic document that will be made available to the data subjects in which he is informed of the existence of the information processing policies that will be applied to his personal data, the way to access them and the type of treatment that will be carried out.

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6. Obligations of STT Group corporation in relation to the Processing of Personal Data


The STT Group corporation will strictly comply, in its capacity as responsible for the information, with the obligations established by law; Likewise, it is aware of the importance of observing the policies and protocols aimed at protecting the personal data of the data subjects since it is aware that the data is the property of the data subjects and only the latter can decide on them. Consequently, the STT Group corporation is obliged to comply with the following duties in relation to the processing of personal data:

- a) Guarantee to the data subject, at all times, the full and effective exercise of the rights of Access, Rectification, Cancellation and Opposition (ARCO Rights);
- b) Guarantee to the data subject, at all times, the full and effective exercise of the right of habeas data;
- c) Request and keep, under the conditions provided by law, a copy of the respective authorization granted by the data subject;
- d) Duly inform the data subject about the purpose of the collection and the rights granted to them by virtue of the authorization granted;
- e) Keep the information under the security conditions necessary to prevent its adulteration, loss, consultation, unauthorized or fraudulent use or access;
- f) Guarantee that the information provided is true, complete, accurate, updated, verifiable and understandable;
- g) Update the information, with respect to all new developments regarding the data that has previously been provided and adopt the other necessary measures so that the information provided remains updated;
- h) Rectify the information when it is incorrect;
- i) Provide only data whose processing is previously authorized in accordance with the provisions of the law;
- j) Demand respect for the security and privacy conditions of the data subject information;
- k) Process queries and claims made in the terms indicated in the law;
- l) Inform when certain information is under discussion by the data subject, once the claim has been submitted and the respective process has not been completed;
- m) Inform at the request of the data subject about the use given to their data.

7. Acceptance of this Privacy Policy

7.1 Express acceptance of this Privacy Policy and the processing of information and personal data in accordance with its terms occurs when the client, supplier and/or collaborator provides their data, when they acquire, provide or use any of our services, have access to our electronic media and/or products, when you are browsing our websites or when you use any of our mobile applications and/or electronic services in any version; Proof of any of these facts will be unequivocal proof of acceptance of this Privacy Policy and the processing of the Personal Data of the data subject thereof.


7.2 By accepting this General Privacy Policy, each of our clients, suppliers and/or collaborators and applicants, in their capacity as data subject of the information and personal data collected, expressly authorizes STT to process them, in accordance with partially or

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totally, including the collection, storage, recording, use, circulation, processing, deletion, and transfers under the terms of this Privacy Policy within the country or to third countries of the data provided for the purposes described in the Privacy Policies of the third parties to whom said personal data is transferred. With the acceptance of this Privacy Policy, each of our clients or users, in their capacity as data subject of the information and personal data collected, authorizes the processing of said data for all the purposes established in this document and especially for:

- Use the information and personal data provided to send to the registered emails, client or user, as well as any information related to the product or service purchased.
- Use the information received for marketing purposes of our products and services, and the products and services of third parties with whom STT maintains a business relationship.
- Share information and personal data with commercial representatives, tour operators including hotels, vehicle rental companies, insurance companies, among others.
- Provide information and personal data to national and international control and surveillance, administrative, police and judicial authorities, pursuant to a legal or regulatory requirement and/or use or disclose this information and personal data in defense of rights and/or the property of STT, its clients, our websites or its users, for the detection or prevention of fraud, for the prevention, detection, apprehension or prosecution of criminal acts or when STT in good faith considers that The provision of information and personal data is in the best interest in accordance with the law.
- Allow access to information and personal data to auditors or third parties hired to carry out internal or external audit processes specific to the commercial activity we carry out.
- Consult and update personal information.
- Contract with third parties the storage and/or processing of information and personal data for the correct execution of the contracts entered into with us, under the security and confidentiality standards to which we are obliged.
- Transfer your information and personal data in the event of a change of control of one or more of STT or any of the business units through merger, acquisition, bankruptcy, spin-off, or creation, to the new entity in control of STT or of the business unit. If, as a consequence of the change of control, there is a change in the person responsible for processing the information and personal data, said situation will be informed to the data subjects of the information and personal data, so that they can exercise their rights in accordance with the applicable law. The conditions under which the data subjects may exercise their rights will be indicated at the time of reporting the change of control.

7.3 With the acceptance of this Privacy Policy, each of the **Candidates** and/or **Aspirants** and **hired collaborators** in their capacity as data subject of the information and personal data

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provided authorizes the processing of said data for all the purposes established in this document and especially for:

- Use the information and personal data provided to send to emails, information related to the processes and procedures of Human Talent, such as: administration of vacancies available in the Company, information related to and referring to the selection process, hiring, and/or any other type of information related directly and indirectly to the fulfillment of the obligations derived from the employment contract, civil or commercial contract and with the administration of Human Talent. Likewise, the management of payroll or payment tickets, benefits derived from an employment contract, request for relevant information for the Company, withholding certificates at source, request to update data, information of interest, request for documents, scheduling of shifts of work, circulars, policies, manuals, training and education courses, reservations and pre-reservations in the use of benefit tickets, corporate agreements, confirmation of voucher to the use of transportation and/or any other type of information directly and indirectly related to the compliance with the obligations derived from the existence of an employment contract.
- Verify the veracity of the information provided, consult references, as well as consult official portals as appropriate.
- Consult and update information and personal data, at any time, in order to keep said information updated.


8. Purpose of the Privacy Policy

8.1 The purpose of the Privacy Policy is to communicate to clients, suppliers and/or collaborators what information and personal data we collect, for what purposes, how we use it, when we share it and how we protect it, as well as the rights that assist you.

8.2 This privacy policy and processing of personal data is prepared in accordance with the provisions of applicable local regulations regarding the collection, storage, use, circulation, deletion and all those activities that constitute processing of personal data.

8.3 The information and personal data are provided by our clients, suppliers and/or collaborators, to make the provision of our services possible. STT recognizes the importance of security, privacy and confidentiality of the information and personal data that our clients, suppliers and/or collaborators provide through the various marketing channels of our products and services (including websites, offices, call centers , mobile applications and emails), and we are committed to the protection and adequate processing of the same, in accordance with the legal regime for the protection of personal data applicable in each territory where we operate.

9 . Information and personal data we obtain

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9.1 In STT we may collect information and personal data from our clients, suppliers and/or collaborators, which may vary due to requirements of local authorities, technological facilities, nature of the product and/or service to be supplied, among others, for such purposes. We may collect the following information and personal data, which may be stored and/or processed on servers located in computer centers, whether our own or contracted with third parties, located in different countries.

9.2 Additionally, for security purposes, STT may collect, store, share and compare with different administrative, control and surveillance authorities, police authorities and judicial authorities, national and international, personal information and data, clients, suppliers and/or collaborators, obtained through image, audio or video recording devices, located in our facilities. STT informs the general public of this fact by publishing Privacy Notices located in the places where this information and personal data are collected.


10 . Purposes of the processing of information and personal data

10.1 The information and personal data collected are used, in general, to process, confirm, fulfill and provide the services and/or products acquired, attention to queries, complaints and claims, payment of salary, provisions, compensations and indemnities, accounting records, correspondence, processing, promoting and advertising our activities, products and services, training and seminars, carrying out financial transactions of payments, collections or refunds, attending to legal procedures, making reports or meeting requirements from the different national or international administrative control and surveillance authorities, police authorities or judicial authorities, banking entities and/or insurance companies, for internal administrative and/or commercial purposes, including market research, audits, accounting reports, statistical analysis, billing, offering our services and/or products, and others complementary services and activities, identification of fraud and prevention of money laundering and other criminal activities and other purposes indicated in this document. However, the purposes of the processing will depend on the type of databases in question.

10.2 The processing of information and personal data by those responsible and in charge is framed in the guarantee and respect of the treatment principles defined by the applicable law. These principles are the principles of legality, truthfulness, purpose, prior informed consent, data security, confidentiality and responsibility.

10.3. We inform you that third parties may be involved in these activities, including system providers, security tools for processing banking transactions, call centers, banking entity service operators, insurers, our representatives or agents, and that these activities may be carried out in different countries. to the place where the service is contracted or the product is purchased, and without prejudice to other purposes that have been informed in this document and in the terms and conditions of each of the products and services of each of our business units and/or under the Privacy Policies of said third parties.

10.4. STT does not sell or transfer the information and personal data of our clients, suppliers and/or collaborators to third parties for a price.

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10.5. In STT, the different databases that exist are registered and updated as necessary in compliance with legal obligations.


The specific policies for each of the indicated databases are detailed below, but not without first highlighting that the acquisition of personal databases from sources external to STT is not permitted if there is no guarantee that each and every one of the data subjects of the databases in question, have previously authorized their treatment for the purposes for which they intend to be acquired and that after these databases remain in the custody of STT, they have the minimum information security controls to prevent unauthorized or fraudulent use or access.

10.5.1. Clients

This database is made up of the information we have about people who have expressed their interest in getting our products and/or services through any of our service channels. It is made up of current clients, that is, those who purchased our products and services.

The purposes for which we process the personal data of current clients, as long as we have obtained their authorization, are:

- Client Management
- Training and education
- Internal statistics management
- Provision of services in favor of clients of the Company
- Administrative procedures
- Check out documents
- Publications
- Sending information to the data subjects, related to the purpose of the organization
- Data update campaigns and information on changes in the processing of personal data
- Legal and Financial Management
- Sending communications
- Carrying out consulting, auditing, advisory services and related services
- Inventory control
- Administrative management
- Accounting, fiscal and administrative management, collections and payments, billing, fiscal management, history of commercial relations, economic,
- Requirement by control body, judicial or administrative authority
- Deliver commercial references and confirmation of issued certificates


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- Data and reference verification
- Verification of legal, technical and/or financial requirements
- Management of commercial relations abroad
- Verification of disciplinary, judicial, and police records
- Commercial prospecting, offering products and services of the Company, allies or third parties
- Control of compliance with obligations by the Client
- Measures to control theft, other crimes, conduct not permitted by the Company
- Compliance or non-compliance with financial obligations
- Verify and report financial, banking or credit information to credit risk databases or any other nature
- Capture, store and verify business and employment references, location and contact information, credit history, property and own assets.
- Update, delete, deactivate, suspend or terminate the processing of personal data to the extent that the technological means and contractual obligations between the parties allow it.
- Allow the Company to configure a database that can be transferred or transmitted nationally or internationally to third parties under any title or object of another legal transaction.
- Efficiently communicate STT's own information, as well as that of our subsidiaries and/or commercial allies, about products, services, offers.
- Inform about new products or services that are related to the purchased service(s).
- Evaluate the quality of the service(s).
- Inform about changes to our products or services.
- Participate in loyalty programs with benefits.
- Conduct market studies on consumer habits.
- The other purposes closely associated and necessary to fulfill the marketing purposes.


10.5.2. STAFF

This personal database is made up of the information that STT has on active workers, former workers, whether retired or pensioned, and beneficiaries of workers and pensioners.

In the case of workers, the purposes for which the Company processes their personal data are the following:

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- Protect the personal information of active and inactive workers, pensioners and beneficiaries and guarantee the confidentiality of the information provided to public and private companies for the execution of the obligations derived from the employment relationship.
- Society's welfare programs,
- Administration of conventional benefits for workers and pensioners
- Registration, control and monitoring of the management of disciplinary investigations
- Payroll management and compliance with obligations associated with social security and occupational health
- Administration of conventional benefits for workers and pensioners
- Administrative management, Compensation Fund and events
- Capture and process personal data of minors represented by the Worker in response to the fulfillment of a higher interest that ensures respect for the fundamental rights of the minor(s) and only when necessary to comply with local legislation.
- Capture and process personal data of third parties provided by the Worker to process affiliations, contact in case of emergency or transfer of information.
- Provide employment references, confirm or certify employment relationships with the Company
- Registration, control and monitoring of the management of disciplinary investigations
- Wellness programs
- Conduct health and safety studies
- Carry out performance evaluations and apply disciplinary and sanctioning procedures
- Verify the authenticity of the data and safeguard the security of the Company. Verify and report financial, banking or credit information to credit risk databases or any other nature
- Management of permits, licenses and authorizations, management of sanctions, reprimands, warnings, exclusions, administrative procedures, reservations and issuance of transport tickets, personnel management, social benefits, prevention of occupational risks, promotion and employment management
- Carry out internal and external audit processes
- Know the person's health status, which includes: results of laboratory tests, medical studies, medical diagnoses, general or specialized, psychological or psychiatric, when required by law.
- Capture and process photographs and videos so that they can be published in printed media (cards), audiovisual media, institutional social networks.

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- Collect information about the candidate by contacting their work and personal references and studying their publications on the Internet and other media (newspapers, magazines, newsletters, television, etc.).
- Provide, share, send, deliver personal data to headquarters and/or linked to the Company located in Jamaica or any other country in which said Companies require the information for the purposes described.
- Promotion and selection of personnel
- Staff training
- Delete or deactivate data from the database
- For business benefits management
- Historical, scientific and statistical purposes
- Compliance with contractual obligations towards the Company and the Company towards clients and suppliers
- Allow you to acquire and/or access the products of the Company, its commercial allies or third parties
- Verify authenticity of the data and safeguard the security of the Company
- Allow the Company to maintain a database that can be transmitted and transferred nationally or internationally to third parties in any capacity and without discrimination between countries.
- Other purposes and work obligations set on the Authorization of Processing of Personal Data Annexes

10.5.3. Suppliers


This database is made up of the information available on current and potential suppliers registered as natural persons. Additionally, it contains information on natural persons who have any debt with STT, except for those who are clients and workers, since these cases are part of the databases referred to in the previous paragraphs.

The purposes for which STT processes the personal data of suppliers are the following:

- Management of actions necessary to fulfill the administration purposes of suppliers and third parties that have already signed a contract with the Company.
- Management of actions necessary for the identification of possible suppliers for the company's supply tasks, while facilitating data management and administration of the documents required internally to register as a supplier of the company.
- Management of actions necessary to fulfill the administration purposes, derived from the payment of an obligation or that for any other reason, the company owes you some debt.

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- Supplier and contractor management
- Training and education
- Internal statistics management
- Provision of services in favor of clients of the Company
- Administrative procedures
- Check out documents
- Publications
- Sending information to the data subjects, related to the purpose of the organization
- Data update campaigns and information on changes in the processing of personal data
- Legal and Financial Management
- Information systems administration, key management, user administration
- Operational development
- Sending communications
- Carrying out consulting, auditing, advisory services and related services
- Inventory control
- Administrative management
- Accounting, fiscal and administrative management, collections and payments, billing, fiscal management, history of commercial relations, economic,
- Requirement by control body, judicial or administrative authority
- Deliver commercial references and confirmation of issued certificates
- Data and reference verification
- Verification of legal, technical and/or financial requirements
- Health Risk Verification
- Management of commercial relations abroad
- Information on employees of the supplier or contractor and payment of social benefits
- Verification of disciplinary, judicial, and police records
- Commercial prospecting, offering products and services of the Company, allies or third parties
- Control of compliance with obligations by the supplier or contractor
- Measures to control theft, other crimes, conduct not permitted by the Company

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- Promotion and prevention programs
- Compliance or non-compliance with financial obligations
- Inspection and control of security and social protection
- Verify and report financial, banking or credit information to credit risk databases or any other nature
- Capture, store and verify business and employment references, location and contact information, credit history, property and own assets.
- Update, delete, deactivate, suspend or terminate the processing of personal data to the extent that the technological means and contractual obligations between the parties allow it.
- Allow the Company to configure a database that can be transferred nationally or internationally to third parties under any title or object of another legal transaction.


10.5.4. Other databases

The provisions of this section of this Personal Data Processing Policy will apply to other databases that exist, such as the visitor database.

Additionally, we will use your personal information for the following secondary purposes, **which are not necessary for the requested service** , but which allow and facilitate us to provide you with better service:

- If you are a collaborator of the STT Group, your image may be used, royalty-free, for: internal use in reports and manuals of the STT Group and for the dissemination of activities and events of the STT Group, to advertise its services, through web pages and social networks of Grupo STT and in documents and graphic material (such as posters, brochures or others). Likewise, data about your children may be used for welfare activities.
- Profiling to offer you other services offered by Grupo STT; and sending commercial information regarding services of Grupo STT, subsidiaries and affiliates.
- Comply with our obligations as employers to assign the tasks assigned to you as a worker; for the prevention of occupational risks; profile analysis; security and access control to buildings; associative, cultural, recreational and sports activities; and labor audits, occupational medical examinations
- Commercial prospecting


If you do not want your personal data to be used for these secondary purposes, please indicate this through a request to the Data Protection department Email or business location information is described in chapter 16 of this document.

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11. What personal data will we use for these purposes?

To carry out the purposes described in this privacy notice, we will use the following personal data:

- Name
- Civil status
- Birthdate
- Nationality
- Address
- Personal phone
- Cell phone
- Email
- Electronic signature
- Age
- Position or position held
- Work address
- Institutional email
- Institutional telephone
- Job references
- Information generated during the recruitment, selection and hiring processes Job training
- Photography for STAFF
- Educational career of applicants and STAFF
- Titles of applicants and STAFF
- Professional ID for applicants and STAFF
- Certificates of applicants and STAFF
- Recognitions of applicants and STAFF
- Number of children and/or dependents of STAFF
- Name and date of birth of minors dependent on STAFF
- Hobbies, sports and games of interest to the STAFF
- Other information that is included in the applicant's CV

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- Applicant References
- No. Bank accounts
- Clients and Supplier ID Number (Legal Representative)
- Certificate of legal representative of Clients
- Contract, Statute or Commercial Minutes of clients
- Affidavit of the person regarding Client companies
- Commercial and Client Billing Management
- Other data collected in the Contract and/or Authorizations

12 . Veracity of the information


12.1. Clients, suppliers and/or collaborators must provide us with truthful information about their information and personal data to make possible the provision of the services contracted for STT or by STT, as well as for other services that they require and under whose conditions they agree to deliver the information. required.

12.2. At STT we presume the veracity of the information provided and we do not verify, nor do we assume the obligation to verify it. Therefore, we do not assume responsibility for damages and/or losses of any nature that may arise from the lack of veracity, validity, sufficiency or authenticity of the information and personal data, including damages that may be due to homonymy or impersonation. of identity.

13. Who do we share your personal information with and for what purposes?

We inform you that your personal data is shared outside the country with the following people, companies, organizations or authorities other than us, for the following purposes:

Recipient of personal data	Purpose	Requires consent
STT GROUP DE CR SA (COSTA RICA)	transfer made to holding companies, subsidiaries or affiliates under the common control of the controller	No
GROUP SUCURSAL COLOMBIA SA (STT BRANCH)	transfer made to holding companies, subsidiaries or affiliates under the common control of the controller	No

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14 . Protection, security and confidentiality of information and personal data

14.1. We have established information security policies, procedures and standards, which may change at any time at the discretion of STT, whose objective is to protect and preserve the integrity, confidentiality and availability of information and personal data, regardless of the medium or format where are located, their temporary or permanent location or the way in which they are transmitted. In this sense, we rely on technological security tools and implement security practices recognized in the industry, which include: transmission and storage of sensitive information through secure mechanisms, such as encryption, use of secure protocols, securing technological components, restriction of access to information only to authorized personnel, information backup, secure software development practices, among others.

14.2. In accordance with current legislation, only personnel authorized by STT, internal or external collaborators as required by STT, may access the data described above. In some cases, third-party STT service providers may use users' personal data to provide certain services. In this case, the suppliers will adopt all the necessary technical and administrative measures to prevent the use of confidential information for purposes other than the provision of services, its accidental or illicit destruction and/or its accidental loss, and are obliged to comply with this Privacy Policy and Personal Data Processing, as well as the security measures that STT has to safeguard the personal data it has in its databases and its processing.


14.3. Third parties hired by STT are also obliged to adhere to and comply with this Privacy Policy, STT's information security policies and manuals, as well as the security protocols that we apply to all our processes.

14.4. Every STT contract with third parties (contractors, external consultants, temporary collaborators, etc.) that involves the processing of information and personal data of our clients, suppliers and/or collaborators, includes a confidentiality agreement that details their commitments for the protection, care, security and preservation of confidentiality, integrity and privacy thereof.

15. Procedures to exercise the rights of the data subjects of the information

Clients, suppliers and/or users have the right to know their personal data that is under our control and to exercise the rights that assist them as data subjects thereof, in the terms of the data protection regulations that apply to them and in accordance with as established in this Privacy Policy.

16. How can you access, rectify or cancel your personal data, or object to its use?

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You have the right to know what personal data we have about you, what we use it for and the conditions of use we give it (Access). Likewise, it is your right to request the correction of your personal information if it is outdated, inaccurate or incomplete (Rectification); that we delete it from our records or databases when we consider that it is not being used appropriately (Cancellation); as well as oppose the use of your personal data for specific purposes (Opposition). These rights are known as ARCO rights. To exercise any of the ARCO rights, you must submit the respective request through the following means:

You can exercise your rights of access, rectification, cancellation and opposition, as well as revoke your consent, limit the use or disclosure of your personal information, for purposes not necessary for the execution of the contractual relationship, through the email privacidadinformacion@grupostt.com or in our offices located in 47-49 Trinidad Terrace, Kingston 5, in the parish of St. Andrew


We ask that you send us a copy of your identity document, power of attorney in case of mandate, the documents that are important to evaluate your case and the address to which you want us to respond to your request. This information is necessary to validate your identity and comply with the principle of confidentiality. The contact information is also used to know the procedure and requirements for the exercise of ARCO rights and other requests.

STT will respond within a period of up to 30 (thirty) days. In accordance with the Data Privacy Act, 2020.

17. The use of tracking technologies on our internet portal through Cookies

We inform you that on our website we use cookies, web beacons or other technologies, through which it is possible to monitor your behavior as an internet user, as well as provide you with a better service and experience when browsing our website. We will use the personal data that we collect through these technologies for the following purposes:

- Preserves user statuses across all page requests.
- to determine the visitor's preferred language and set the language accordingly on the website, if possible.
- to distinguish between humans and bots.
- Check if the user's browser supports cookies.
- Detect if the visitor has accepted the marketing category in the cookie banner. This cookie is necessary for the website to comply with the GDPR.
- Store the user's cookie consent status for the current domain
- Record statistical data on the visitor's behavior on the website. This is used for internal analysis by the website operator.

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- Register a unique ID that is used to generate statistical data about how the visitor uses the website. Used to check if the user's browser supports cookies.
- Ensure the visitor's browsing security by preventing cross-site request forgery, which is essential for the security of the website and the visitor.
- Provide, through third parties, such as Facebook, a series of advertising products such as real-time bidding from third-party advertisers.
- Used by third parties, such as Google DoubleClick to record and report the user's actions on the website after viewing or clicking on one of the advertiser's ads for the purpose of measuring the effectiveness of an ad and presenting specific ads to the user.
- Used by third parties, such as Google AdSense to experiment with advertising efficiency across websites using their services.
- Trying to calculate user bandwidth on pages with embedded YouTube videos.
- Register a unique ID to keep statistics of which YouTube videos the user has watched.
- Record user's video player preferences when viewing embedded YouTube videos
- Collect data on the number of times a user has visited the website as well as the dates of the first and most recent visit. Used by third parties, such as Google Analytics.
- Synchronize data with third-party analysis service.
- Required for web chat functionality.

The personal data we obtain from these tracking technologies is the following:

- Identifiers, username, and passwords for a session
- User preferred language
- Date and time of the start and end of a user session
- Web pages visited by a user

Likewise, we inform you that your personal information will be shared with the following people, companies, organizations or authorities other than us, for the following purposes:

Recipient of personal data	Purpose
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<p align="center">STT GROUP DE CR SA (COSTA RICA)</p>	<p align="center">transfer is made to holding companies, subsidiaries or affiliates under the common control of the person responsible</p>
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It is possible to disable Cookies on Grupo STT's own website <https://grupostt.com/> or, if you prefer, send an email to privacidadinformacion@grupostt.com and we will provide you with all the information regarding cookies and/or how to disable them.

18. Modifications to the Privacy Policy

18.1. STT reserves the right to make modifications or updates to this Privacy Policy at any time, to address legislative developments, internal policies or new requirements for the provision or offering of its services or products. If the data subjects of the personal data does not agree with the new conditions, he or she may revoke the informed consent granted in writing or through our email: privacidadinformacion@grupostt.com.

18.2. These modifications will be available to the public through the following means: on our websites, smartphone applications or through the last email provided.

18.3. Subject to applicable laws, the Spanish version of this Privacy Policy will prevail over any version disclosed in another language. In the event that there is any inconsistency between the Spanish version and any translation of this Privacy Policy in another language, the Spanish version will prevail.

19 . Validity

18.1 This General Privacy Policy is effective from the day of its publication. The first published review is from 01/02/2024.


19. Annexes

STT understands and accepts that in addition to the policy established here, it must be governed by the legal provisions of each of the countries:

ANNEXES

19.1. Mexico Annex

In the case of information and personal data whose processing is carried out in Mexico, the procedures for the exercise of the rights of the data subjects will be those provided for in the

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Federal Law on Protection of Personal Data Held by Private Parties (DOF 05-07 -2010), with its respective Regulations (DOF 12-21-2011).

For this country, STT has designated the Compliance area as the area responsible for ensuring compliance with this policy, where they will be attentive to resolve requests, queries and complaints from the data subjects and to carry out any update, rectification and deletion of personal data. , through the email privacidad.mx@grupostt.com

Likewise, the contact information of the person responsible for processing the information is as follows: Address: Boulevard Manuel Avila Camacho Núm 5 Torre B Piso 24 Office 3 Colonia Lomas de Sotelo, in Naucalpan State of Mexico cp 53390 Telephone: (+55) 41656660 or (+55) 41656661

20.2. Nicaragua Annex

The Data Protection Law (Law No. 787 dated March 21, 2012) of Nicaragua.

For this country, STT has designated the Compliance area as the area responsible for ensuring compliance with this policy, where they will be attentive to resolve requests, queries and complaints from the data subjects and to carry out any update, rectification and deletion of personal data. , through the email privacidadinformacion@grupostt.com.


Likewise, the contact information of the person responsible for processing the information is as follows: Address: Los Robles 3era Etapa adjacent to the south side of La Marsellesa restaurant, house R-7 Telephone: (505) 2223-1880 / 2223-1881

20.3. Costa Rica Annex

The Law on the Protection of the Person Against the Processing of their Personal Data (Law No. 8968 dated November 5, 2011) of Costa Rica and its Regulations (Executive Decree No. 37554-JP dated March 5, 2013 and the reform through Executive Decree No. 40008 dated December 6, 2016), establish the rights that holders of personal data have with respect to their processing.

For this country, STT has designated the Compliance area as the area responsible for ensuring compliance with this policy, where they will be attentive to resolve requests, queries and claims by the data subjects and to carry out any update, rectification and deletion of personal data. , through the email privacidadinformacion@grupostt.com.

Likewise, the contact details of the person responsible for processing the information are as follows: Address: Zona Franca del Este. Building B9, San José, Costa Rica. Tibás, from the

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Fire Department, 100 m West GBS Building, San José, Costa Rica. Telephone: (506) 2527-3000

20.4. Colombia Annex


In the case of information and personal data whose processing is carried out in Colombia, and in development of the security principle established in Law 1581 of 2012, STT will adopt the technical, human and administrative measures that are necessary to provide security to the records. avoiding its adulteration, loss, consultation, unauthorized or fraudulent use or access. The personnel who process personal data will execute the established protocols in order to guarantee the security of the information. Likewise, the procedures for the exercise of the rights of the data subjects will be those provided for in Law 1581 of 2012 and its regulatory decrees.

In compliance with Article 10 of Decree 1377 of 2013, STT will request your authorization to continue processing your information and personal data, in accordance with this Privacy Policy. Likewise, in compliance with literal a) of article 26 of law 1581 of 2012, we inform you that with the express acceptance of this Privacy Policy, you grant us your authorization to transmit and/or transfer your information and personal data to third parties. countries in which we operate, which may have levels of personal data protection different from those required in Colombia, including El Salvador, Peru, Ecuador, Bolivia, Guatemala, Brazil, Costa Rica, USA, Uruguay, Paraguay and Argentina. Likewise, we reiterate that the information contained in the Company's databases will be subject to different forms of treatment, such as collection, exchange, updating, processing, reproduction or compilation, storage, use, systematization and Company, all of them in a manner partial or total in compliance with the purposes established here. The information may be delivered, transmitted or transferred to public entities, business partners, contractors, affiliates, subsidiaries, solely for the purpose of fulfilling the purposes of the corresponding database. It should be clarified that the transmission or transfer will be made in accordance with the commitments that are necessary to safeguard the confidentiality of the information.

For this country, STT has designated the Compliance area as the area responsible for ensuring compliance with this policy, where they will be attentive to resolve requests, queries and complaints from the data subjects and to carry out any update, rectification and deletion of personal data. , through the email privacidadinformacion@grupostt.com.

Likewise, the contact information of the person responsible for processing the information is as follows: Address: Calle 100 No. 8A-49 World Trade Center, Tower A, Floor 5 and Tower B Floor 11 Office 1, in the city of Bogotá. Telephone: (+57) (601) 7048908.

20.5 Peru Annex

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In the case of information and personal data whose processing is carried out in Peru, the procedures for the exercise of the rights of the data subjects will be those provided for in Law 29733 and Supreme Decree 003-2013-JUS (hereinafter the Law and its Regulations).

For this country, STT has designated the Compliance area as the area responsible for ensuring compliance with this policy, where they will be attentive to resolve requests, queries and claims by the data subjects and to carry out any update, rectification and deletion of personal data. , through the email [**privacidadinformacion@grupostt.com**](mailto:privacidadinformacion@grupostt.com).

Likewise, the contact information of the person responsible for processing the information is as follows: Address: Av. Ricardo Palma 341, office 802, Miraflores district. Telephone: (+51) 496-8665

20.6 Ecuador Annex

In the case of information and personal data whose processing is carried out in Ecuador, and in development of the principle of proactive and demonstrated Responsibility, the procedures for the exercise of the rights of the data subjects will be those provided for in the Organic Law for the Protection of Personal Data (LOPD).


For this country, STT has designated the Compliance area as the area responsible for ensuring compliance with this policy, where they will be attentive to resolve requests, queries and claims by the data subjects and to carry out any update, rectification, elimination, opposition, portability and suspension of processing of personal data, through the email [**privacidadinformacion@grupostt.com**](mailto:privacidadinformacion@grupostt.com).

Likewise, the contact information of the person responsible for processing the information is as follows: Address: Guayaquil, Puerto Santa Ana edif the point floor 2 office 202 Telephone: (506) 2527-3000.

20.7 Panama Annex

In the case of information and personal data whose processing is carried out in Panama and in development of the principle of proactive and demonstrated Responsibility, the procedures for the exercise of the rights of the data subjects will be those provided for in Law No. 81 of 2019 on Protection of Personal Data and in Executive Decree No. 285 of 2021, which regulates the Personal Data Protection Law.

For this country, STT has designated the Compliance area as the area responsible for ensuring compliance with this policy, where they will be attentive to resolve requests, queries and claims by the data subjects and to carry out any update, rectification, elimination, opposition, portability and suspension of processing of personal data, through the email [**privacidadinformacion@grupostt.com**](mailto:privacidadinformacion@grupostt.com).

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Likewise, the contact information of the person responsible for processing the information is as follows: Address: PANAMÁ PACIFICO, EDIFICIO Panama Pacifico Edificio 3845 Piso 3 Local 318.

20.8 Argentina Annex

In the case of information and personal data whose processing is carried out in Argentina and in development of the principle of information and confidentiality, the procedures for the exercise of the rights of the data subjects will be those provided for in Law 25,326/2000, which deals with provides protection of personal data and Decree 1,558/2001 that regulates the Personal Data Protection Law.

For this country, STT has designated the Compliance area as the area responsible for ensuring compliance with this policy, where they will be attentive to resolve requests, queries and claims by the data subjects and to carry out any update, rectification, elimination, opposition, portability and suspension of processing of personal data, through the email [**privacidadinformacion@grupostt.com**](mailto:privacidadinformacion@grupostt.com).

Likewise, the contact information of the person responsible for processing the information is as follows: Address: Av Corrientes 800, C1008, Capital de Buenos Aires.

20.9 Dominican Republic Annex

In the case of information and personal data whose processing is carried out in the Dominican Republic, the procedures for the exercise of the rights of the data subjects will be those provided for in Law 172 of 2013.


For this country, STT has designated the Compliance area as the area responsible for ensuring compliance with this policy, where they will be attentive to resolve requests, queries and complaints from the data subjects and to carry out any update, rectification and deletion of personal data. , through the email [**privacidadinformacion@grupostt.com**](mailto:privacidadinformacion@grupostt.com).

Likewise, the contact information for the person responsible for processing the information is as follows: Address: Winston Churchill Street, Acropolis Tower corporate building, 8th floor Spatium, telephone: (809) 227 6222 and/or (829) 619 0103.

20.10 Uruguay Annex

In the case of information and personal data whose processing is carried out in Uruguay, and in development of the principle of proactive and demonstrated Responsibility, the procedures for the exercise of the rights of the data subjects will be those provided for in Law No. 18331/2008. which deals with the Protection of Personal Data and Decree No. 414/2009 that regulates said Law.

For this country, STT has designated the Compliance area as the area responsible for ensuring compliance with this policy, where they will be attentive to resolve requests, queries and

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claims by the data subjects and to carry out any update, rectification, elimination, opposition, portability and suspension of processing of personal data, through the email **privacidadinformacion@grupostt.com**

Likewise, the contact information of the person responsible for processing the information is as follows: Address: MONTEVIDEO PLAZA INDEPENDENCIA DOOR NUMBER 838 OF. 201

20.11 Jamaica Annex

In the case of information and personal data whose processing is carried out in Jamaica, and in development of the principle of proactive and demonstrated Responsibility, the procedures for the exercise of the rights of the data subjects will be those provided in the Data Privacy Act, 2020.

For this country, STT has designated the Compliance area as the area responsible for ensuring compliance with this policy, where they will be attentive to resolve requests, queries and claims by the data subjects and to carry out any update, rectification, elimination, opposition, portability and suspension of processing of personal data, through the email **privacidadinformacion@grupostt.com**

Likewise, the contact information of the person responsible for processing the information is as follows: Address: 47-49 Trinidad Terrace, Kingston 5, in the parish of St. Andrew

STT is in absolute compliance with all the regulations cited above.