



# Privacy Policy

This policy and privacy rules are based on the applicable legal framework to protect the information that has been entrusted to us by you through the website <https://www.polluxcapitals.com/> and/or its mobile application. The objective of Polux Capitals S.A. (the "Company"), entity responsible for the processing of personal data, is to collect the information that the user provided voluntarily and for the indicated purposes. This privacy policy establishes how this information and the user's personal data will be treated.

**You must read these Privacy Policies carefully.** By accessing, connecting and/or using the services provided by the Company, you accept and give your free, express and informed consent with (i) the terms of these Privacy Policies; (ii) the inclusion of all your personal data provided through the website and/or mobile application in the databases that are the property and responsibility of the Company, as well as the processing of all your personal data for the purposes described in the following sections.

## 1. General rules

For the purposes of Law 25,326 on the Protection of Personal Data, it is understood as:

- Personal data: Information of any kind referring to determined or determinable individuals or legal entities (the "information")
- Sensitive data: Personal data that reveals racial and ethnic origin, political opinions, religious, philosophical or moral convictions, union affiliation, income and information regarding health or sexual life.
- File, registry, database or database: Indistinctly, they designate the organized set of personal data that is subject to treatment or processing, electronic or not, whatever the modality of its formation, storage, organization or access.
- Data processing: Operations and systematic procedures, electronic or not, that allow the collection, preservation, ordering, storage, modification, relationship, evaluation, blocking, destruction, and in general the processing of personal data, as well as its transfer to third parties through communications, inquiries, interconnections or transfers.

- Responsible for the file, registry, database or data bank: individual, or public or private legal entity, who is the owner of a file, registry, database or database.
- Computerized data: Personal data subjected to electronic or automated treatment or processing.
- Owner of the data: Any individual or entity with legal domicile or delegations or branches in the country, whose data is subject to the treatment referred to in Law 25,326.
- Data user: Any person, public or private, who performs data processing at their discretion, whether in their own files, registers or data banks or through a connection with them.
- Dissociation of data: All processing of personal data in such a way that the information obtained cannot be associated with a specific or determinable person.

The Company is obliged to comply with the applicable legal framework, including but not limited to Article 43 of the Argentine National Constitution, Law 25326 on the protection of personal data, Decree 1558/2001 regulating

the law on personal data protection, resolution 47/2018 of the Agency for Access to Public Information ("AAIP"), on recommended security measures for the treatment and conservation of personal data in computerized and non-computerized media, and all those regulations complementary to those indicated.

The Company will request the necessary data so that you can use the services offered by the Company. You may request and process the data listed below, without it being an exhaustive list: Contact data (such as name and surname; addresses, telephone, email); DNI, CUIT or CUIL; Demographic data (such as nationality; date and place of birth, age, gender); a "selfie" type photograph; social media information provided by you; condition of politically exposed person; statement on the origin and legality of funds; and information that the user provides us in relation to their queries or comments.

You will be solely responsible for the veracity, accuracy, completeness, validity, authenticity and certainty of the information provided, and must notify the Company of any update or modification immediately. The Company may, however, verify the personal data and/or information provided – by itself or through third parties – by resorting

to public entities, specialized companies or credit bureaus, among others, to which you expressly consent.

In case of not providing the personal data that is mandatory for the registration and use of the services, falsehood and/or inaccuracy is detected in the personal data provided, the Company may suspend and/or cancel the user and/or totally or partially disable their access to the mobile application and/or its services. The foregoing shall not prevent the Company from reporting such falsehoods and/or inaccuracies to third parties and/or competent authorities.

Additionally, the information object of this policy can be obtained through these means, among others: (i) commercial or professional relationships; (ii) provision of services; (iii) labor relations; (iv) personnel selection processes; (v) attendance at training, events, seminars or courses; (vi) sending emails requesting information; and/or (vii) Company website and/or mobile application.

The Company may also access data of its users and/or relevant counterparties, based on consultations in public/private databases (eg databases of the National Registry of Persons, AFIP, the Central Bank of the Argentine Republic, Veraz, and any other that by its nature could be relevant with respect to the commercial relationship with the owner of the data).

The Company does not collect or form and/or manage files, banks or registries that store information related to personal data, except to be able to contact their owners, comply with the legal or contractual obligations in charge of the Company or to send information of interest or invitations to the activities carried out by the Company in compliance with its corporate purpose, or for the purpose indicated in each case (for example, but not limited to sending communications, marketing in general, invitations to events, employment opportunities).

The Company's website manages the information in order to provide the best possible service and for the purpose for which it was given at the time of collection. This information may be used to maintain a record of users and/or orders, if applicable. E-mails may be sent periodically through our site with special offers, new products and other advertising information that we consider relevant to the user or that may provide some benefit. These emails will be sent to the address the user provides and may be canceled at any time upon request.

Nothing in this privacy policy implies or can be interpreted as an obligation of the Company to provide a specific service.

From time to time, the Company website or

mobile application may contain links to other websites for your convenience and information. Those websites may be operated by companies that are not affiliated with the Company. Linked websites may have their own privacy policies or notices, which we recommend that you read if you visit any such linked website. The Company assumes no responsibility for the content of websites other than ours, nor for the use that is made of such websites, nor for their privacy practices.

## 2. Cookies

A cookie refers to a file that is sent with the purpose of requesting permission to be stored on your computer. By accepting said file, the cookie is created and then serves to have information regarding web traffic, and also facilitates future visits to a recurrent website. Cookies can help websites to recognize the user individually and therefore provide the best personalized service on their website.

Our website uses cookies to be able to identify the pages that are visited and their frequency, among other usual uses of cookies. This information is used only for statistical analysis and then the information is permanently deleted. The user can delete

cookies at any time from his computer. However, most browsers automatically accept cookies as it serves to have a better web service. The user can also change the configuration of his computer to decline cookies. If cookies are declined, the user may not be able to use some of the Company's services.

## 3. Provision of sensitive data

No person can be forced to provide sensitive data. Sensitive data can only be collected and processed when there are reasons of general interest authorized by law. They may also be processed for statistical or scientific purposes when their owners cannot be identified. We will not store information that directly or indirectly reveals sensitive data, except with the agreement of its owners.

## 4. Data collection and storage

The information will not be collected by unfair, fraudulent means or contrary to legal provisions. It will be stored in a way that allows the exercise of the right of access of its owner, and will be destroyed when they are no longer necessary or relevant to the purposes for which they were collected.

## 5. Consent and/or authorization to obtain or transfer the data

By registering, using the website and providing data to the Company by any of the indicated means, the user gives express consent for the storage, processing of information and/or use by the Company.

The Company requires prior authorization from its customers, suppliers and employees, for the processing of personal data that is provided within the framework of the contractual relationship reached with them.

At any time the user can restrict the collection or use of personal information that is provided to our website. Every time you are asked to fill in a form, such as the user registration form, you can check or uncheck the option to receive information by email. If you have marked the option to receive our newsletter or advertising, you can cancel it at any time.

The Company will not sell, assign or distribute the personal information that is collected without your consent, unless required by a judge with a court order.

The Company uses the personal data it collects for lawful purposes, seeking continuous improvement in the activities it carries out and in the relationship it maintains with its customers, suppliers, employees, control bodies and other third parties.

## 6. Transfer of information

The personal data collected by the Company may be communicated/transferred to (i) any company related, affiliated, controlled, controlling, subsidiary, representative or related to the Company, (ii) sponsors, patrons and/or strategic partners of the Company, through business collaboration agreements, temporary union of companies or other associative mechanism allowed by law, (iii) third-party providers of data processing and treatment services and (iv) other third parties that may correspond according to the relationship of the Company with the owner of the data or to the lawful reasons and purposes for which they were collected by the Company.

You agree that personal data may be transferred to countries or international or supranational organizations that do not provide adequate levels of protection.

The Company requires those who transfer personal data to comply with adequate standards of confidentiality, protection and security, and especially when said third

parties are located in countries that do not have adequate data protection legislation in accordance with the parameters established by the authorities and regulations of Argentina.

The Company may disclose your personal data (i) if it is required to do so by applicable regulations (including but not limited to the Central Bank of the Argentine Republic ("BCRA"), the Financial Information Unit ("UIF"), the Federal Public Revenue Agency (AFIP), the National Social Security Administration (ANSES), among others); (ii) within the framework of a judicial process or in compliance with a requirement of a competent authority, (iii) to the security forces and bodies or to other public officials when legitimately requested, (iv) when it considers that said disclosure is necessary or convenient to avoid physical harm or economic loss, or (v) in the context of an investigation of fraudulent or illegal activities, or that are suspected of being fraudulent or illegal. You also authorize us to transfer your personal data in the event of the sale or transfer of all or part of our company or our assets (including in cases of restructuring, dissolution or liquidation)

## 7. Rights of the holder of personal data

### Right of information

Any person may request information from the enforcement body regarding the existence of personal data files, records, databases or

banks, their purposes and the identity of those responsible. The record kept for this purpose will be open to the public and free of charge.

### Right of Access

The owner of the data, after proof of their identity, has the right to request and obtain information on their personal data included in public or private data banks intended to provide reports.

The person in charge or user must provide the requested information within ten (10) calendar days of having been irrefutably required to do so.

Once the term has expired without the request being satisfied, or if the report has been evacuated but it is deemed insufficient, the action for the protection of personal data or habeas data provided for by law will be expedited.

The right of access can only be exercised free of charge at intervals of no less than six (6) months, unless a legitimate interest to that effect is proven.

The exercise of the right to which this section refers, in the case of data of deceased persons, will correspond to their universal successors. The petitioner must prove the link by means of the corresponding declaration of heirs, or by reliable document that verifies the character of universal successor of the interested party.

The request referred to in this point does not require specific formulas, provided that it guarantees the identification of the owner of the data. It can be done directly, by presenting the interested party to the person in charge or user of the file, registry or database, or indirectly, through the irrefutable notice in writing that leaves a record of receipt. Other direct or semi-direct access services can also be used, such as electronic means, telephone lines, receipt of the claim on screen or other suitable means for this purpose. In each case, media preferences may be offered to find out the required response.

The right of access will allow to:

- Know whether or not the owner of the data is in the file, registry or database;
- Know all the data related to the person that appears in the file;
- Request information about the sources and means through which the data was obtained;
- Request the purposes for which they were collected;
- Know the intended destination of personal data;
- Know if the file is registered in accordance with the requirements of Law No. 25,326.

Once the deadline to answer has expired, the interested party may take action to protect personal data and report the fact to the Agency for Access to Public Information for the purposes of the pertinent control of this body.

## **Content of the information provided to the owner of the personal data**

The information must be provided in a clear manner, free of coding and, where appropriate, accompanied by an explanation of the terms used, in language accessible to the average knowledge of the population.

The information must be comprehensive and relate to the entire record belonging to the owner, even when the request only includes one aspect of the personal data. In no case may the report reveal data belonging to third parties, even when they are linked to the interested party.

The information, at the option of the owner, may be provided in writing, by electronic, telephone, image, or other suitable means for this purpose.

## **Right of rectification, update or deletion**

Every person has the right to have the personal data of which they are the owner, which are included in a database, rectified, updated and, when appropriate, deleted or made confidential.

The person in charge or user of the database must proceed to rectify, delete or update the personal data of the affected party, carrying out the necessary operations for this purpose within a maximum period of five (5) business days after receiving the claim from the owner

of the data, or the notification regarding its error or falsehood.

Failure to comply with this obligation within the term agreed in the preceding paragraph, will enable the interested party to promote without further action the protection of personal data or habeas data provided for in Law 25,326.

In the event of assignment or transfer of data, the person in charge or user of the database must notify the rectification or deletion to the assignee within the fifth business day after the processing of the data.

The deletion does not proceed when it could cause damage to the rights or legitimate interests of third parties, or when there is a legal obligation to keep the data.

During the process of verification and rectification of the error or falsity of the information in question, the person in charge or user of the data bank must either block the file, or record when providing information about the circumstance that it is subject to review.

Personal data must be kept for the periods provided in the applicable rules or, where appropriate, in the contractual provisions between the person in charge or user of the data bank and the owner of the data.



## 8. Doubts, complaints and suggestions

In all cases in which the owner of the data intends to address to the Company a doubt and/or a request and/or a complaint and/or a claim and/or a request for rectification, updating or deletion of data, they must send a note to the following email box: [helpdesk@polluxcapitals.com](mailto:helpdesk@polluxcapitals.com) or to the following address:

### POLUX CAPITALS S.A.

**Address:** Juncal 1635, Floor 1 "B", CABA

**Att:** Privacy Policy

The Company will process said note or email within ten (10) days of receiving it and will process its response through the contact information contained in the note or email.

The Agency for Access to Public Information, in its capacity as the enforcement body of Law No. 25,326, has the authority to deal with complaints and claims filed by those who are affected by their rights due to non-compliance with current regulations regarding the protection of personal data.

The Agency for Access to Public Information has its offices at Av. Pte. Gral Julio A. Roca 710, 3rd floor, City of Buenos Aires.  
<https://www.argentina.gob.ar/aaip>.

## 9. Commitment of clients, suppliers and personnel

Customers and suppliers who contract with the Company, as well as its employees, must act in full accordance with these policies and with the Personal Data Protection Law No. 25,326 and other regulations that complement or replace it in the future.

Likewise, the Company, its suppliers and its clients must adjust their actions to the recommendations contained in Provision 47/2018 of the AAIP for the treatment and conservation of personal data in computerized and non-computerized media.

The Company will make its best efforts to maintain the security of the personal information of its customers, suppliers and employees, contemplating the practical, technical and internal organizational measures necessary to guarantee the security, integrity and confidentiality of the data, diligently trying to avoid unauthorized access, as well as the destruction, use, modification or disclosure of data, in accordance with the provisions of art. 9 of Law 25,326, as amended, and in particular in the recommendations contained in Provision 47/2018 of the AAIP, which establishes the different security measures for the treatment and conservation of personal data contained in private data banks.

The Company will make its best efforts to prevent unauthorized access to the personal

information of its customers, suppliers and employees.

## 10. Continuous improvement

In order to guarantee the dissemination of these policies and their correct understanding by the staff, the Company carries out periodic awareness and training activities concerning the protection of personal data.

The Company performs internal controls in order to ensure compliance with these policies and suggest possible changes to improve the mechanisms for collecting, securing and processing personal data.

## 11. Validity

This policy is effective as of the date of its publication. The Company reserves the right to change the terms of this Privacy Policy at any time. Any dispute will be settled by the competent courts of the City of Buenos Aires, expressly waiving any other jurisdiction.

Last update: December 2021