

## Personal Data Processing Policy - Magneto Global S.A.S.

### 1. Legal Context

The processing of Personal Data is carried out in compliance with applicable regulations regarding personal data protection.

The Personal Data processing policy described herein (hereinafter the "Policy") shall be applicable to any relationship of a legal or contractual nature with Clients, Suppliers, Users, Employees, and other third parties whose data is subject to Processing by Magneto Global S.A.S.

### 2. Controller

The databases subject to this policy are the responsibility of:

Magneto Global S.A.S., identified with NIT 901.645.620-3, with headquarters at Carrera 43 a 5 A 113. Ed. One Plaza, Floor 20, North Tower, Medellín, email [habeasdata@magnetoglobal.com](mailto:habeasdata@magnetoglobal.com), and telephone (604) 6042328.

Magneto Tec S de RL de CV, identified with RFC MTE240321E10, with address at Av. Ferrocarril de Cuernavaca 214. Col. Los Morales Sección Palmas. Alc. Miguel Hidalgo, Int 525, C.P 11540, email [habeasdata@magnetoglobal.com](mailto:habeasdata@magnetoglobal.com), and telephone +52 5611992300.

Psyconometrics S.A.S., identified with NIT 900.535.995-4, with headquarters at Carrera 43 a 5 A 113. Ed. One Plaza, Floor 20, North Tower, Medellín, email [habeasdata@talenta365.com](mailto:habeasdata@talenta365.com), and telephone (604) 6042328.

Magneto IA LLC, identified with EIN 99-0788525, with headquarters at 8 The Green #19360, Dover, DE 19901, email [habeasdata@magnetoglobal.com](mailto:habeasdata@magnetoglobal.com).

For the management and claims regarding Personal Data, Valentina Mesa González is appointed as the person in charge of responding to and processing the exercise of the Rights of the Data Subjects and ensuring compliance with personal data protection regulations.

### 3. Definitions

The concepts defined below are essentially those contained in Decree 1377 of 2013.

Authorization: Prior, express, and informed consent of the Data Subject to carry out the processing of Personal Data.

Privacy Notice: Verbal or written communication generated by the Controller, addressed to the Data Subject for the processing of their Personal Data, through which they are informed about the existence of the information processing policies applicable to them, how to access them, and the purposes of the intended processing.

Database: Organized set of Personal Data subject to processing.

Client: Person, especially of a legal nature, who acquires or receives services offered by MAGNETO GLOBAL S.A.S. or by those Companies that commission the collection and processing of Personal Data under the purposes entrusted in the transmission and/or transfer contract. The Client will occasionally be the Data Controller, depending on the service acquired, and may be referred to as an Ally; they may also be referred as such in cases where MAGNETO GLOBAL S.A.S. acts as a Data Processor.

Chatbot: Virtual assistant that communicates with Clients, Suppliers, Users, Employees, and other third parties whose data is subject to Processing through Web Sites, WhatsApp lines, and/or text messaging, for the purpose of resolving inquiries, supporting registration to any of the platforms, creating or applying to vacancies, creating or resolving questionnaires, conducting interviews, producing video interviews, managing notification preferences, and updating personal information on the platforms, among others.

Company: Refers to MAGNETO GLOBAL S.A.S. or those companies that commission the collection and processing of Personal Data under the purposes entrusted in the transmission and/or transfer contract.

Personal Data: Any information linked to or that can be associated with one or more specific or determinable natural persons.

Public Data: Data that is not semi-private, private, or sensitive. Public data includes, among others, data relating to the civil status of individuals, their profession or trade, and their status as a merchant or public servant. By its nature, public data may be contained in public records, public documents, official gazettes and bulletins, and duly executed judicial sentences not subject to confidentiality.

**Sensitive Data:** Sensitive data are those that affect the privacy of the Subject or whose improper use may generate discrimination, such as those revealing racial or ethnic origin, political orientation, religious or philosophical convictions, membership in trade unions, social organizations, human rights organizations, or those promoting the interests of any political party or guaranteeing the rights and guarantees of opposition political parties, as well as data relating to health, sexual life, and biometric data.

**Employee:** Natural person who has a labor relationship with MAGNETO GLOBAL S.A.S.

**Data Processor:** Natural or legal person, public or private, who by themselves or in association with others, performs the processing of Personal Data on behalf of the Data Controller.

**Magneto:** Technological platform owned by MAGNETO GLOBAL S.A.S., through which Personal Data of the Subjects registered therein are captured, stored, and processed.

**MejoratuHv:** Technological platform owned by MAGNETO GLOBAL S.A.S., through which Personal Data of the Subjects registered therein are captured, stored, and processed.

**Knowledge 365:** Technological platform owned by MAGNETO GLOBAL S.A.S., through which Personal Data of the Subjects registered therein are captured, stored, and processed.

**Performance 365:** Technological platform owned by MAGNETO GLOBAL S.A.S., through which Personal Data of the Subjects registered therein are captured, stored, and processed.

**Platforms:** Shall be understood as the plural and collective expression of Magneto, Knowledge, Performance, and Potential.

**Potential 365:** Technological platform owned by MAGNETO GLOBAL S.A.S., through which Personal Data of the Subjects registered therein are captured, stored, and processed.

**Supplier:** Refers to natural or legal persons who provide professional or technical services as suppliers or contractors.

**Data Controller:** Natural or legal person, public or private, who by themselves or in association with others, decides on the database and/or the processing of the data.

Data Subject: Natural person whose Personal Data is subject to processing.

Transfer: Data transfer takes place when the Controller and/or Processor of Personal Data, located in Colombia, sends information or Personal Data to a recipient, who in turn is a Data Controller and is located inside or outside the country.

Transmission: Processing of Personal Data that involves the communication thereof within or outside the territory of the Republic of Colombia when its object is the performance of processing by the Processor on behalf of the Controller.

Processing: For the application of this manual, any processing of Personal Data shall be understood as any operation or set of operations on Personal Data, such as collection, storage, use, circulation, or deletion.

User: Individuals who register on any of the platforms owned by MAGNETO GLOBAL S.A.S. and/or who receive services through any digital channel.

Mandatory nature of the policy

These policies are mandatory and strictly followed by all employees of THE CONTROLLERS, contractors, and third parties acting on their behalf.

All employees of THE CONTROLLERS must observe and respect these policies in the performance of their duties. In cases where no labor link exists, a contractual clause must be included so that those acting on behalf of THE CONTROLLERS are obliged to comply with these policies.

Failure to comply with them will result in labor sanctions or contractual liability as the case may be. This is without prejudice to the duty to respond financially for damages caused to data subjects or THE CONTROLLERS due to non-compliance with these policies or the improper processing of personal data.

#### 4. Data We Collect

In order to create a profile on any of our Platforms or use any other type of solution we offer, it may be necessary for you to provide all or part of the following data:

Full name

Type and number of identity document

Gender

Personal or institutional email

Telephone number (landline and/or mobile)

Location

Date of birth

Marital status

Nationality

Residential address

Profession

Academic history

Work experience

Personal and/or professional references

Contact IP address

Additionally, if you have your resume registered with us, we store and process the information contained therein, the video presentation, pre-filter questions, and interview videos requested in the selection processes in which you participate with our Clients, as well as the results of psychometric tests you have applied for in selection processes where you are participating; these data are used so that our Allies and/or Clients can contact you and invite you to be part of their talent team.

Likewise, Clients using our services may send personal information to facilitate account management and invitations to use the services. Finally, if you are invited to the MAGNETO Platform, for example, as a referral due to finding characteristics of a specific vacancy in you, the person who invited you may send personal information about you.

Disclaimer: Personal Data of third parties provided to MAGNETO GLOBAL S.A.S. by a User, such as name, contact telephone, email of a friend, relative, referral, or professional and/or personal reference for the acquisition of a service offered by MAGNETO GLOBAL or for the confirmation of data provided in the User's resume, are understood to be covered by a prior Authorization that the User assumes to have previously obtained from the third party. Therefore, by accepting this Policy, the User declares to have the third party's authorization to deliver their data to Magneto Global.

If you have completed a selection process with one of our Allies or Clients and they perform psychometric tests on you, we store as processors the results of your tests, as well as the photograph or video recording of the test presentation, if applicable. These data are confidential and are only shared with employers or potential employers who are our Clients with whom you participate in selection processes or evaluations during your labor relationship; however, MAGNETO is not responsible for the misuse of information by different Users of the Websites, whether considered personal or not.

If you subscribed to our blogs and vacancy newsletters, you may receive information of interest not only regarding job offers but also regarding professional growth. You may also receive invitations to events held by the Company or in alliance with other companies through any means of notification you have shared with us, including, but not limited to, email, WhatsApp, SMS, phone calls, among others.

## 5. Sensitive Data

Additionally, in the provision of our services, we may collect, store, and process the following data of a sensitive nature:

Health status resulting from medical examinations necessary for the execution of labor obligations in favor of MAGNETO GLOBAL S.A.S. or its Clients or Allies, when applicable.

Existence of disabilities.

Membership in vulnerable populations.

Physical characteristics and biometric data such as image and/or voice, as a consequence of profile creation on the Platforms or telephone or virtual communications, or the performance of video presentations or video interviews, as well as the video recording of images obtained through video surveillance processes, among others.

IP Address.

When the processing involves sensitive data such as those mentioned above—that is, data affecting the Subject's privacy or whose misuse may generate discrimination, such as those revealing physical and mental health information, sexual life, biometric data, ethnic origin, political orientation, religious convictions, union affiliation, and political interests—the Controller will guarantee that its processing is carried out according to legal limitations and ensuring that:

- a) Prior, informed, explicit, and express authorization is always obtained to carry out said processing.
- b) The Subject has been informed of the voluntary nature of their authorization.
- c) No activity will be conditioned upon the request for this type of data.
- d) Its processing is explicitly regulated by law.

Based on the above, with the approval of the processing of your personal data, you expressly authorize the Controller, in a free, voluntary, and informed manner, to store your IP address, for the use and processing of your biometric data, physical characteristics, voice, health status, membership in vulnerable population groups, and existence of disabilities. Consequently, you freely allow the Controller to record your Image through photographs, videos, recordings, video surveillance systems installed in the Controller's offices, audiovisual procedures, interviews, appointments, or any other form that reproduces your image, and the use of your Voice in recordings, videos, audio reproductions, or any other form that reproduces your Voice (hereinafter the "Recordings"), and to perform, if necessary, corresponding security studies to comply with the purposes contained in the Policy. Likewise, you are informed that, as these are sensitive data, you are not obliged to authorize their processing.

## 6. Acceptance of the Personal Data Processing Policy

[Note: Section 6 in the provided text lists exceptions where authorization is not required, although the header implies acceptance.]

Data of a public nature.

Information required by authorities in the exercise of their functions through administrative acts, judicial sentences, or any other legal nature.

Data related to the Civil Registry of persons.

Cases of medical or health urgency.

Processing of information authorized by law for historical, statistical, or scientific purposes.

## 7. Purposes of Processing:

In the ordinary course of its business, the Controllers will carry out the automated processing of your Personal Data corresponding to its collection, storage, use, circulation, and/or deletion contained in Databases for legitimate purposes, complying with the Constitution and the Law. The Processing of Personal Data shall have the following purposes:

- (i) Execute commercial, financial, accounting, auditing, labor, administrative, contractual tasks and activities, among others, of the Controller companies.
- (ii) Allow the creation of accounts on the different Platforms.
- (iii) Allow the search for your profile as a candidate on the Platforms.
- (iv) Use your data for investigative, analytical, and statistical purposes for product development related to the execution of our social object.
- (v) Carry out labor intermediation management through the Magneto platform.
- (vi) Comply with the obligations of the Controller derived from commercial or legal relationships established with Users, Clients, Suppliers, Employees, and Subjects in general.
- (vii) Perform the due diligence of consulting and reporting information of Users, Clients, Suppliers, Employees, or Subjects in general regarding their financial, commercial, credit information and compliance with laws regarding the prevention of money laundering and terrorism financing.
- (viii) Analyze and store the responses given in the presentation of commercialized psychometric tests for the purpose of issuing reports of your results to our Clients and proposing product improvements.
- (ix) The transfer or transmission of personal data to Allies, Suppliers, and third parties, both national and foreign, including countries that do not have levels of protection equal to or higher than those of Colombia, will be carried out only for the purposes established in this Policy. Such transfers or transmissions will be carried out after signing the corresponding transmission or transfer agreements, as applicable, and based on the authorization granted by the Subject for the processing of their personal data, in accordance with the law.

(x) Send text messages (SMS and USSD), data messages, or make calls for advertising purposes, updating terms and conditions and policies, commercial prospecting, collection management, and invitations to participate in events, newsletters related to any of our services and/or management of the contractual relationship, within the hours established by the applicable norm, which may be carried out through any means such as SMS and USSD, WhatsApp, email, landline or mobile phone, social networks, or any contact method provided by the Subject.

(xi) Send messages—SMS, messages via chatbots, data messages—or make calls for informative purposes, create profiles for registration on the different Platforms, create vacancies, participate in own selection processes or those of Clients, update Personal Data, notify stages in selection processes or verify your identity for security reasons, recommend profiles with affinity for vacancies, among others, which may be carried out through any means such as SMS and USSD, WhatsApp, email, landline or mobile phone, social networks, or any contact method provided by the Subject.

(xii) Carry out security studies, either by transferring or transmitting the provided information to Allies or third parties. Likewise, wealth studies, selection processes, home visits, investigations of work accidents and disabilities, benefit segmentation, risk identification, public health monitoring, and age-related investigations.

(xiii) Prevent abuse and fraud in the use of our services.

(xiv) Make recommendations so that the profile and information established in the resume downloaded from LinkedIn are more attractive and visible to meta-search engines and selection analysts.

(xv) Perform pre-registration on the Magneto and Marble Head-hunter platforms.

(xvi) Carry out video surveillance activities, based on the analysis of biometric data that facilitate facial recognition and authentication of the Subject's identity, through video surveillance systems located in our facilities.

(xvii) Carry out activities such as applying for vacancies, answering pre-filter questions, conducting video interviews through the Chatbot.

(xviii) Use photographs and/or videos for public dissemination on pages, social networks, and/or platforms managed by the Controller, for advertising and informative purposes, in which activities of the social object are being developed.

(xix) Improve our Advertising and Marketing: we may process this information to send you promotional and marketing messages; administer referral programs, rewards, surveys, sweepstakes, contests, or other promotional activities or events sponsored or managed by MAGNETO GLOBAL; analyze characteristics and preferences to send you promotional messages, marketing information, advertising, and other information we believe may be of interest to you and invite you to relevant events and opportunities.

(xx) Offer training and/or formal and informal education programs of MAGNETO GLOBAL

or higher education institutions.

(xxi) Consult information managed by Information Operators of the Social Security System.

(xxii) Consult and share the results of my legal, disciplinary, labor, academic background, and consult my financial information with Credit Bureaus. These sources may come from public lists, direct contact with academic institutions and/or education secretariats, companies, the Integrated Contribution Liquidation Form (PILA) from authorized operators, credit bureaus, LAFT restrictive lists, among others.

(xxiii) Consult, request, supply, report, process, obtain, compile, confirm, exchange, analyze, receive, and send all information referring to my credit, financial, commercial, service behavior, and that coming from third countries of the same nature.

(xxiv) Establish technological and physical access controls to maintain security in the physical infrastructure of the facilities and Websites of MAGNETO GLOBAL and its affiliates, as well as monitoring the activities carried out therein.

(xxv) Conduct surveys, analyses, studies, and research for statistical purposes for strategic decision-making by MAGNETO.

(xxvi) Send through any electronic or physical means of communication, known or to be known, via SMS, emails, WhatsApp, or calls, general, institutional, commercial, and/or marketing information and notifications related to products and services offered by MAGNETO GLOBAL, as well as its branch entities, affiliates, subordinates, or controlled entities.

(xxvii) Publish and disclose images, personal data, voices, photos, sounds, films, among others, during events, programs, templates, newsletters, among others, conducted by MAGNETO GLOBAL.

(xxviii) Incorporate personal data into physical or digital folders and files where the Subject's labor history at MAGNETO GLOBAL is recorded.

(xxix) Use the User's personal data to evaluate their performance, competence, and skills in the development of their own functions at MAGNETO GLOBAL, as well as to carry out respective development and training plans.

(xxx) Update socio-demographic information in Family Compensation Funds as well as for MAGNETO GLOBAL clients who require it to carry out their selection processes.

## 8. Rights of the Data Subjects and Procedure for their Exercise:

### 8.1. Rights of the Data Subjects and who may exercise them:

Data Subjects possess the following rights regarding their Personal Data, which they can access free of charge:

**Right of access or consultation:** The right of the Subject to be informed by the Controller, upon request, regarding the origin, use, and purpose given to their Personal Data.

Rights of complaints and claims: The Law distinguishes four types of claims:

Claim to know, update, and rectify: The right of the Subject to know, update, rectify, or modify partial, inaccurate, incomplete, or fractionated data, those that lead to error, or those whose processing is expressly prohibited or has not been authorized.

Claim for deletion: The right of the Subject to have data deleted that are inadequate, excessive, or do not respect constitutional and legal principles, rights, and guarantees.

Claim for revocation: The right of the Subject to void the authorization previously granted for the processing of their Personal Data.

Claim for infringement: The right of the Subject to request that non-compliance with Data Protection regulations be corrected.

Right to request proof of the authorization granted: Except when expressly excepted as a requirement for processing in accordance with Art. 10 of Law 1581 of 2012.

Right to file complaints with the Superintendence of Industry and Commerce: This right may only be exercised once the consultation or claim process before the Data Controller or Data Processor has been exhausted.

These rights may be exercised by:

The Data Subject, who must sufficiently prove their identity.

Successors of the Subject, who must prove such status.

The representative and/or attorney-in-fact of the Subject, upon accreditation of representation or power of attorney.

By stipulation in favor of another and for another.

The rights of children or adolescents shall be exercised by persons empowered to represent them.

8.2. Channel for exercising the rights of the Subjects:

Subjects may exercise their rights only through a written communication sent to the following form. (Click here).

If the claim is incomplete, the interested party will be required within five (5) days following receipt of the claim to correct the faults. After two (2) months from the date of the requirement without the applicant presenting the required information, it will be understood that the claim has been abandoned.

### 8.3. Exercise of rights

Depending on the type of right being exercised, the Controller will follow these rules and procedures:

#### 8.3.1. Consultation

The Subject may make consultations a maximum of once every calendar month or whenever there are substantial modifications to the Controller's Data Processing Policies.

For consultations with a frequency higher than stated, the Controller may charge the Subject for shipping, reproduction, and, if applicable, certification of documents.

Consultations will be attended to within a maximum term of ten (10) business days from their filing date. The Controller may extend the response term once for a period no longer than five (5) business days, notifying the Subject of such determination before the expiration of the initial term.

Information requested through the right of consultation will only be sent via the same email indicated in the request form.

#### 8.3.2. Petitions or Claims

Every petition or claim must contain at least the information indicated in the form referenced in this Policy.

If it does not have complete information, the Controller will require the applicant within five (5) days following receipt to correct the faults. If not corrected within the following two months, the request will be deemed abandoned.

If the petition or claim was not addressed to the Controller, the latter will transfer it to the

appropriate party within two (2) business days, informing the applicant.

Once the claim is received, a legend stating "claim in process" and the reason for it will be included in the database within no more than two (2) business days.

Petitions or claims will be attended to within a maximum term of fifteen (15) business days from their filing date. The Controller may extend the term once for no more than eight (8) business days, notifying the Subject before the expiration of the initial term.

Once the claim process is exhausted, the Subject or successor may file a complaint with the Superintendence of Industry and Commerce.

## 9. Security Policies

THE CONTROLLER, in order to comply with the principle of security established in article 4 literal g) of Law 1581 of 2012, has implemented technical, human, and administrative measures necessary to guarantee the security of records, avoiding their alteration, loss, consultation, use, or unauthorized or fraudulent access.

Furthermore, through the signing of the corresponding transmission and transfer contracts, the Controller has required the Processors and Controllers they work with to implement the security measures necessary to guarantee the security and confidentiality of information in the processing of Personal Data.

## 10. International Data Transfer

Applicable regulations prohibit the transfer of data to countries that do not have the security conditions established in said Law. However, it may be carried out when the Subject expressly authorizes it.

Now, for the provision of our services of access, attraction, evaluation, analytics, and talent selection, we require that the Personal Data we capture be transferred to our developers and Clients domiciled abroad to issue the results; therefore, by accepting this Policy, you previously, expressly, and informedly authorize us to proceed with the international transfer of your data for the purpose contained herein.

On the other hand, our regulations indicate that when we transmit information to Processors domiciled outside the country, the consent or authorization of the Subject is not required; therefore, regarding this possibility, we do not request your authorization.

## 11. Video Surveillance

MAGNETO GLOBAL SAS uses various video surveillance means installed in different internal and external sites of our facilities or offices.

MAGNETO GLOBAL SAS informs about the existence of these mechanisms through advertisements in visible places.

The collected information will be used for the security purposes of persons, assets, and facilities. This information can be used as evidence in any type of process before any type of authority and organization.

## 12. Data Retention Period

Your Personal Data will be kept for the time required for MAGNETO GLOBAL S.A.S. to provide the services, until the Subject requests the deletion of their credentials, profiles, and Personal Data, as well as for the time necessary to comply with legal or contractual obligations to keep them under custody.

This policy and procedure manual for the processing of Personal Data enters into force on April 4, 2025.