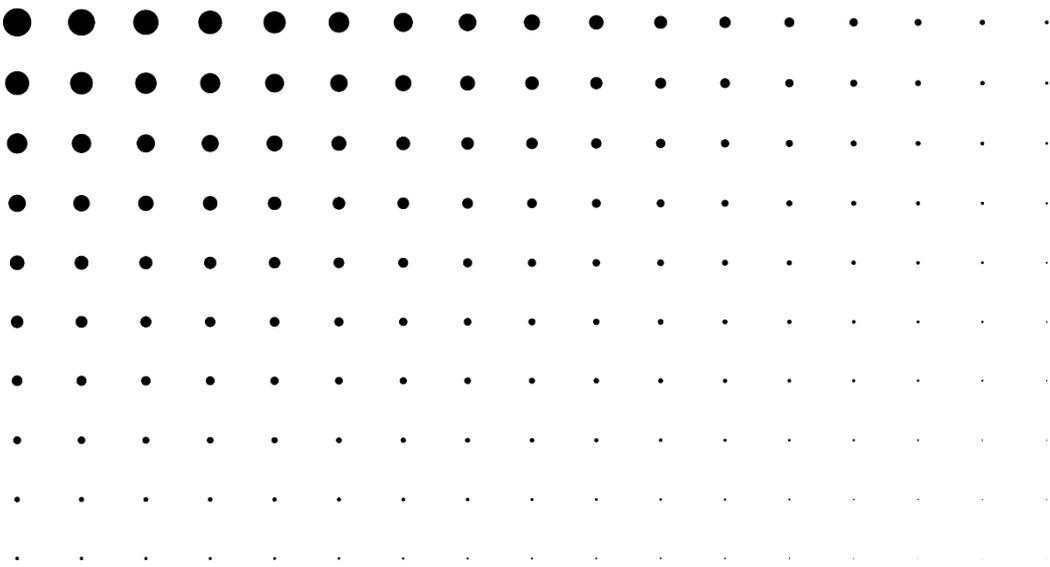


ANDINO

Global

PERSONAL DATA PROTECTION POLICY



PERSONAL DATA PROTECTION POLICY

Approved by the Board of Directors – 2025 Version

1. Purpose and Objective

This Personal Data Protection Policy aims to establish the principles, procedures, and responsibilities that ensure compliance with Regulation (EU) 2016/679 (General Data Protection Regulation – GDPR) and Organic Law 3/2018 on Personal Data Protection and the Guarantee of Digital Rights (LOPDGDD). Its purpose is to protect individuals' fundamental rights, in particular the right to privacy, and to ensure the lawful, fair, and transparent processing of personal data managed by Andino Inversiones Global S.A. and its group of companies.

2. Scope of Application

This Policy applies to all personal data processing activities carried out by Andino Inversiones Global S.A., as well as by its subsidiaries and affiliated companies in Spain, Peru, and Mexico. It is mandatory for directors, executives, employees, contractors, and data processors involved in the processing of personal data subject to the GDPR under the responsibility of the Andino Group.

3. Regulatory Framework

This Policy is based on and aligned with the following regulations and guidelines, among others:

- Regulation (EU) 2016/679 on the protection of personal data (GDPR).
- Organic Law 3/2018 on Personal Data Protection and the Guarantee of Digital Rights (LOPDGDD).
- Law 2/2023 on the protection of whistleblowers.
- Royal Decree 311/2022 regulating the National Security Framework (ENS).
- Guidelines and recommendations issued by the Spanish Data Protection Authority (AEPD).

4. Data Processing Principles

Personal data shall be processed in accordance with the following principles:

- **Lawfulness, fairness, and transparency:** data shall be processed lawfully and in a transparent manner in relation to the data subject.
 - **Purpose limitation:** data shall be collected for specified, explicit, and legitimate purposes.
 - **Data minimization:** only data that is adequate, relevant, and limited to what is necessary shall be processed.
 - **Accuracy:** data shall be kept accurate and up to date.
 - **Storage limitation:** data shall be retained only for the period necessary to fulfill the purposes of processing.
 - **Integrity and confidentiality:** appropriate technical and organizational measures shall be applied to ensure data security.
 - **Accountability:** the Group shall be able to demonstrate effective compliance with the GDPR.
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5. Data Subject Rights

Any individual whose personal data is processed by Andino Inversiones Global S.A. has the right to:

- **Access:** obtain confirmation as to whether personal data concerning them is being processed and for what purposes.
- **Rectification:** request the correction of inaccurate or incomplete data.
- **Erasure:** request the deletion of their data (“right to be forgotten”).
- **Objection:** object to certain processing activities.
- **Portability:** receive their data in a structured, commonly used, and machine-readable format.
- **Restriction:** request the suspension or limitation of processing.

Requests shall be addressed within a maximum period of one month, which may be extended by up to two additional months in complex cases. The Data Protection Officer (DPO) shall act as the primary contact point for the exercise of these rights.

6. Roles and Responsibilities

- **Data Controller:** Andino Inversiones Global S.A.

- **Data Processors:** group companies, external advisors, technology service providers, and suppliers.
 - **Data Protection Officer (DPO):** oversees GDPR compliance, provides advice, and reports directly to the Board of Directors.
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7. Record of Processing Activities (RoPA)

Andino Inversiones Global S.A. maintains an up-to-date Record of Processing Activities (RoPA) that includes processing purposes, categories of data and data subjects, recipients, international transfers, and retention periods. The DPO shall oversee its annual review and any updates resulting from new processing activities or technological changes.

8. International Data Transfers

Where processing activities involve transfers of personal data outside the European Economic Area, including to Group subsidiaries in Peru or Mexico, appropriate safeguards pursuant to Article 46 of the GDPR shall be implemented, such as Standard Contractual Clauses or adequacy assessments, as applicable. Such transfers shall be duly documented in the RoPA and supervised by the DPO.

9. Security Measures and Incident Management

The Andino Group implements appropriate technical and organizational measures to ensure the security, integrity, and confidentiality of personal data, including:

- Access control and user authentication mechanisms.
- Data encryption and backup systems.
- Password policies and mobile device management.
- Incident logging and a data breach response plan.

In the event of a personal data breach, the Spanish Data Protection Authority (AEPD) shall be notified within a maximum period of 72 hours, and affected data subjects shall be informed where required, in accordance with Articles 33 and 34 of the GDPR.

10. Training and Awareness

All employees and collaborators of the Andino Group shall receive periodic training on data protection, information security, and confidentiality. The DPO shall coordinate training activities, simulations, and annual awareness campaigns.

11. Oversight and Review

Compliance with this Policy shall be subject to internal or external audits at least every two years. The DPO shall submit an annual report to the Board of Directors outlining review results, recorded incidents, and corrective measures implemented.

12. Approval and Entry into Force

This Personal Data Protection Policy has been approved by the Board of Directors of Andino Inversiones Global S.A. and enters into force on the date of its approval. It is mandatory for all employees, executives, and collaborators of the Group.

The effective implementation of this Policy contributes to ensuring the trust of clients, partners, and authorities, reinforcing the Andino Group's commitment to ethics, transparency, and international regulatory compliance.