NOUSWARE S.A.S. Personal Data Processing Policy

OBJECTIVE

NOUSWARE S.A.S. (hereinafter NOUSWARE) seeks to guarantee the protection of personal data or any other type of information that is used or stored in its databases and files, guaranteeing the constitutional right of all persons to know, update, and rectify the information that has been collected about them in databases or files. All of this is in development of the provisions of Article 15 of the Political Constitution, Law 1266 of 2008, Law 1581 of 2012, and other regulatory decrees.

In accordance with the foregoing, NOUSWARE adopts this personal data processing policy, which will be informed to all data subjects from whom data has been collected or may be obtained in the future in the exercise of the company's activities in developing its corporate purpose, thereby guaranteeing the constitutional right of Habeas Data, privacy, intimacy, and the right to good standing in the processing of personal data.

NOUSWARE declares that this policy complies with the standards required by international reference norms on personal data processing, such as the GDPR (General Data Protection Regulation of the European Union) and the sectoral laws HIPAA (Health Insurance Portability and Accountability Act), COPPA (Children's Online Privacy Protection Act), and GLBA (Gramm-Leach-Bliley-Act) in the United States of America.

DATA CONTROLLER

Nousware S.A.S., domiciled in the city of Medellín, Antioquia, Colombia, with its main headquarters located at Calle 18 sur 39 A 235 Int. 1004.

PHONE: +57 3108218773

EMAIL: legal@nousware.ai

OFFICIAL WEBSITE: www.nousware.ai

SCOPE

This Personal Data Protection Policy will apply to all Databases and/or Files containing Personal Data of natural persons that are subject to Processing by NOUSWARE. This policy will apply to all employees, third parties, clients, distributors, suppliers, or contractors who carry out Personal Data Processing in the development of their commercial or employment relationship with NOUSWARE, or to whom a general or specific task has been entrusted, from which a particular Personal Data Processing derives.

This policy will not be applicable when NOUSWARE acts as a Data Processor, as this role implies that the purposes are delimited by the third party who contracts and transmits its databases to NOUSWARE, giving precise instructions regarding the processing that must be

given to the Personal Data. In this sense, when NOUSWARE is the Data Processor, it will be subject to the data Processing policy of the Data Controller and will guarantee the Controller that it will only process the personal data for the objectives or purposes communicated by the Controller in agreements or contracts concluded with NOUSWARE.

This policy will apply to third parties with whom NOUSWARE has signed a contract for the transmission or transfer of Personal Data or delivers information for the development of particular activities, provided that NOUSWARE acts as the Controller.

DEFINITIONS

- **Authorization:** Verbal or written communication generated by NOUSWARE directed to the Data Subjects to inform them of the existence of this Policy, how to access it, and by which, through an unambiguous action such as clicking, they authorize the Processing of their Personal Data for the purposes and in the terms of this Policy.
- **Authorized Person:** Individuals who can exercise the rights of the Data Subject, such as the Data Subject, proving their identity by the means available; their successors-in-interest who prove such quality; the representative and/or attorney-in-fact, proving their status through legal power of attorney or representation; and those who, by stipulation in favor of another or for another, are accredited.
- **Database:** Organized set of Personal Data that is subject to processing by NOUSWARE.
- **Personal Data:** Any information linked or that can be associated with one or several specific or identifiable natural persons. Some examples of personal data are: name, citizenship ID, address, email, phone number, marital status, health data, fingerprint, salary, assets, financial statements, etc..
- **Private Data:** Data that, due to its intimate or reserved nature, is only relevant to the Data Subject.
- **Public Data:** Data classified as such according to the mandates of the law or the Political Constitution, and all data that is not semi-private, private, or sensitive. Data related to the civil status of persons, their profession, ID number, and other data contained in public records, public documents, duly executed court rulings that are not subject to confidentiality, official gazettes, and bulletins are considered public data.
- **Semi-Private Data:** Data that is not of an intimate, reserved, or public nature, and whose knowledge or disclosure may be of interest not only to its Data Subject but also to a certain sector or group of people or society in general, such as financial and credit data from commercial activity.
- **Sensitive Data:** Information that affects the Data Subject's intimacy or whose improper use could generate discrimination, such as data revealing racial or ethnic origin, political orientation, religious or philosophical convictions, membership in unions, social or human rights organizations, or that promotes the interests of any political party or guarantees the rights and guarantees of opposition political parties, as well as data related to health, sexual life, and biometric data, among others, such as the capture of still or moving images, fingerprints, photographs, iris, voice, facial, or palm recognition, etc..

- **Data Subject:** A natural person whose Personal Data is subject to Processing.
- **Data Processor:** The natural or legal, public or private person, who by themselves or in association with others, performs the Processing of Personal Data on behalf of a Controller.
- **Data Controller:** The natural or legal, public or private person, who by themselves or in association with others, decides on the Database, the Processing of Personal Data, and/or the purposes and conditions of the Processing. For these purposes, the Controller will be NOUSWARE; however, taking into account NOUSWARE's commercial activities, it will act as a Processor when it performs any Processing on the Databases sent to it by clients who contract its services, provided that these clients determine the purposes and guidelines of the processing.
- **Processing:** Any operation or set of operations on Personal Data, such as collection, administration, storage, use, circulation, transmission, transfer, or deletion.
- **Transfer:** Takes place when the Data Controller and/or Processor located in Colombia sends the information or Personal Data to a recipient, who in turn is a Data Controller and is located within or outside the country.
- **Transmission:** The Processing of Personal Data that involves the communication of such data 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.
- **Information Processing Policy:** This is the present document, which contains the guidelines for the Processing of Personal Data that arise in any type of Processing that NOUSWARE performs on Personal Data. Particularly, this includes the purposes, the types of Processing, the rights of the Data Subjects, the procedures to guarantee those rights, and the persons within NOUSWARE in charge of handling queries, complaints, and/or claims.
- **Privacy Notice:** Verbal or written communication generated by the Controller, addressed to the Data Subject for the processing of their personal data, by which they are informed about the existence of the information processing policies that will be applicable, the way to access them, and the purposes of the processing intended for the personal data.
- **Claim:** Request from the data subject or persons authorized by them or by law to correct, update, or delete their personal data, or to revoke the authorization in the cases established by law.

PRINCIPLES

NOUSWARE will apply all the principles regarding the processing of personal data described in Article 4 of Law 1581 of 2012 and declares that it will act in accordance with the principles for the processing of personal data described and developed in the General Data Protection Regulation of the European Union.

PURPOSES

- Allowing the participation of Data Subjects in marketing and promotional activities carried out by NOUSWARE.
- Executing the existing contractual relationship with its clients, suppliers, and employees, including the payment of contractual obligations, as well as the

assistance, consulting, and support necessary to fulfill the obligations arising from the commercial relationship.

- Materializing potential commercial and/or legal relationships with persons interested in being clients, suppliers, or employees of NOUSWARE.
- Carrying out its own administrative, accounting, and fiscal management, including, but not limited to, billing management, collections and payments management, supplier management, client management, and reports to tax authorities.
- Evaluating the quality of the service, conducting market research, and statistical analysis for internal use.
- Responding to queries, petitions, complaints, and claims made by Data Subjects and control bodies, and transmitting Personal Data to other authorities that, by virtue of applicable law, must receive the Personal Data.
- To eventually contact, via email, or by any other means, natural persons with whom it has or has had a relationship, such as, without this list being exhaustive, employees and their families, shareholders, consumers, clients, distributors, suppliers, creditors, and debtors, for the aforementioned purposes.
- Transferring the collected information to different areas of the company and to its related, subsidiary, affiliated, and controlled companies in Colombia and abroad when necessary for the development of its operations (portfolio recovery and administrative collections, treasury, accounting, among others).
- For attending to judicial or administrative requirements and complying with judicial or legal mandates.
- Registering your personal data in NOUSWARE's information systems and in its commercial and operational databases.
- Supporting internal or external audit processes.
- Any other activity of a nature similar to those previously described that is necessary to develop the corporate purpose of NOUSWARE.
- Those indicated in the authorization granted by the data subject or described in the respective privacy notice, as the case may be.
- To fulfill the obligations contracted by NOUSWARE with its Clients at the time of acquiring our products.
- To provide the services and/or products required and/or contracted by the clients.
- To know and use the necessary and required information owned by the client for the implementation, provision, development, and support of NOUSWARE's products and/or services contracted by the client.
- To supply usernames, passwords, and access codes to NOUSWARE's products and/or services contracted by the client.
- For the administration and control of accounting and financial information.
- To send to a physical address, email, cell phone, or mobile device, via text messages (SMS and/or MMS) or through any other analogous and/or digital communication medium, created or to be created, commercial, technical, advertising, or promotional information about products and/or services, events, and/or promotions, whether commercial or not, in order to boost, invite, direct, execute, inform, and generally, carry out campaigns, promotions, or contests of a commercial or advertising nature, conducted by: i) NOUSWARE; ii) NOUSWARE's related, subsidiary, affiliated, subordinate, or controlled companies, its distributors, and strategic allies located in Colombia or any other country; and/or iii) by third parties.

- For the determination of outstanding obligations, the consultation of financial information and credit history, and the reporting of unfulfilled obligations to credit bureaus, regarding its debtors.
- To train salespeople and agents in basic aspects of commercial management of the products offered by NOUSWARE.
- Invitation to training sessions.
- To supply, share, transmit, transfer, send, or deliver your personal data to related, subsidiary, affiliated, subordinate, or controlled companies of NOUSWARE, its distributors, and strategic allies located in Colombia or any other country, in the event that said companies require the information for the purposes indicated herein and to contact the Data Subject for the purpose of offering goods or services of interest.
- To inform about new products or services and/or about changes to them.
- To use the different services through NOUSWARE's websites, software, and applications, including downloading content, documents, and formats.
- To develop the selection, evaluation, and employment hiring process.
- To administer and operate, directly or through third parties, the personnel selection and hiring processes, including the evaluation and qualification of participants and the verification of work and personal references, and conducting medical, psychological, and security checks.
- To register the information of employees and/or pensioners, and their families (active and inactive) in NOUSWARE's databases.
- To carry out the typical activities of Human Resources management within NOUSWARE, such as payroll, affiliations to entities of the general social security system, welfare and occupational health activities for the employee and their family, exercise of the employer's sanctioning power, among others.
- To make the necessary payments derived from the execution of the employment contract and/or its termination, and other social benefits that may be applicable in accordance with the law.
- To comply with the labor obligations contracted by NOUSWARE as an employer.
- To execute academic, social, labor, recreational, and welfare agreements with public and private entities for the benefit of the group of employees and their families.
- To contract employment benefits with third parties, such as life insurance, medical expenses, among others.
- To notify authorized contacts in case of emergencies during working hours or in connection with the performance of work.
- To coordinate the professional development of employees, employee access to the employer's IT resources, and to provide support for their use.
- To plan business activities.
- To comply with contractual obligations.
- To process your payments and verify outstanding balances.
- For registration in NOUSWARE's accounting and administrative systems.
- For the administration and control of accounting and financial information.
- For the evaluation of the fulfillment of your obligations.
- To invite them to participate in selection processes and events organized or sponsored by NOUSWARE.

RIGHTS OF THE DATA SUBJECT

This policy informs and guarantees the right of habeas data to the Data Subjects, which is the power of the Personal Data Subject to demand from the Data Controllers access, inclusion, exclusion, correction, addition, updating, and certification of the data. In this sense, and in accordance with the applicable legislation on personal data processing, the Data Subject has the following rights:

- To know, update, modify, and rectify their Personal Data free of charge from the Data Controllers or Processors, in accordance with the provisions of Article 21 of Decree 1377 of 2013.
- To request proof of the authorization granted to NOUSWARE, or, failing that, the implementation of efficient or alternative communication mechanisms, in accordance with Article 10 of Decree 1377 of 2013. This authorization may be granted verbally, in writing, or by means of conclusive conduct such as clicking to accept the terms and conditions of use of the website and this Policy in the case of users; therefore, said copy may be a screenshot or other means that proves the granting of authorization.
- To request information about the uses and purposes to which their Personal Data is being subjected.
- To file complaints for infringements regarding Personal Data with the Superintendence of Industry and Commerce, after having submitted a request, query, or claim to NOUSWARE or the Data Processor.
- To revoke the authorization and/or request the suppression of their Personal Data and its storage in NOUSWARE's databases, provided there is no legal or contractual duty that prevents the exercise of this right of suppression.
- To access their personal data that has been processed, free of charge, at least once every calendar month, and every time there are substantial modifications to this policy that motivate new queries.
- Any other rights conferred by the Personal Data Protection Regime.

The above rights may only be exercised by those Data Subjects or Authorized Persons who sufficiently prove their identification with the relevant documentation or reliable credentials.

SOURCES OF INFORMATION

NOUSWARE collects information from the following sources:

Directly from the data subject.

Automatically when the data subject uses NOUSWARE's websites.

On NOUSWARE's websites, cookies and other tools are used that collect information from those who visit them; by the simple act of entering said websites, the following information may be obtained automatically:

- The hyperlinks you have clicked on.
- Information about the browser you use.
- Details of the pages you have viewed.

- Your IP address.
- The sites you visited before arriving at the Portal.

Given the above, if the Data Subject does NOT want this information to be collected automatically, they must disable the automatic acceptance settings in their Internet browser. There, they can block it, as well as detect when such information is being sent to their device. It should be noted that if cookies are disabled, the experience on the Website may be affected. NOUSWARE may obtain personal information from public databases or from third parties authorized by the data subject to share, transmit, or transfer information.

AUTHORIZATION

NOUSWARE will request prior, express, and informed authorization from the Data Subjects whose Personal Data it requires to Process. The authorization for NOUSWARE to process personal data will be granted by: i) The data subject, who must sufficiently prove their identity by the different means NOUSWARE makes available ; ii) The data subject's successors-in-interest, who must prove such quality ; iii) The data subject's representative and/or attorney-in-fact, upon accreditation of the representation or power of attorney ; iv) Another party in favor of whom or for whom the data subject has stipulated.

NOUSWARE will obtain the authorization through different means, including physical document, electronic, data message, Internet, Websites, Orally (through a phone conversation or video conference), or in any other format that in any case allows obtaining consent through unambiguous conduct from which it can be concluded that if the same had not been provided by the data subject or the person legitimized for it, the data would not have been stored or captured in the database.

PROCESSING OF SENSITIVE PERSONAL DATA AND DATA OF MINORS

The Processing of Personal Data of a sensitive nature is prohibited by law, unless there is express, prior, and informed authorization from the Data Subject, among other exceptions enshrined in Article 6 of Law 1581 of 2012.

In situations where NOUSWARE collects and Processes Sensitive Data, it will inform the Data Subject that granting consent in that case is completely voluntary and optional. Additionally, the Data Subject will be informed which of the collected information is considered sensitive.

As provided by Article 7 of Law 1581 of 2012 and Article 12 of Decree 1377 of 2013, NOUSWARE will only carry out the Processing corresponding to children and adolescents as long as this Processing responds to and respects the best interests of the children and adolescents and ensures respect for their fundamental rights.

Once the above requirements are met, NOUSWARE must obtain the Authorization of the legal representative of the child or adolescent, after the minor exercises their right to be heard,

an opinion that will be valued taking into account maturity, autonomy, and capacity to understand the matter.

SECURITY OF PERSONAL DATA

In compliance with the principle of security established in the current regulations, NOUSWARE will adopt the necessary technical, human, and administrative measures to provide security to the records, avoiding their adulteration, loss, consultation, use, or unauthorized or fraudulent access.

NOUSWARE's obligation and liability are limited to providing the appropriate means for this purpose. NOUSWARE does not guarantee the total security of your information nor is it responsible for any consequences derived from technical failures or from the improper entry by third parties into the Database or file where the Personal Data subject to Processing by NOUSWARE and its Processors are stored. NOUSWARE will require the service providers it contracts and its subsidiaries, affiliates, controlled companies, subordinates, its distributors, and strategic allies to adopt and comply with the appropriate technical, human, and administrative measures and those established herein for the protection of Personal Data in relation to which said third parties act as Processors.

PROCEDURE FOR HANDLING QUERIES AND CLAIMS

The terms and manner of submitting: (i) queries; (ii) complaints or claims; or (iii) requests for revocation of authorization or suppression of Personal Data are described below. Data Subjects may initiate these procedures to guarantee their habeas data rights or to report a non-compliance that, in their opinion, they consider serious in relation to NOUSWARE's obligations. Petitions submitted by data subjects or authorized persons will be answered within the legal terms established in Law 1581 of 2012 and its regulatory decrees.

The channels that NOUSWARE has implemented for the data subject to exercise their rights and submit respectful requests are the following:

Written communication sent to NOUSWARE's domicile and main headquarters located at Calle 18 sur 39 A 235 Int. 1004 in Medellín, Antioquia, Colombia.

Request submitted to the email: legal@nousware.ai

These channels may be used by Data Subjects, or third parties authorized by law to act on their behalf, in order to exercise the following rights:

Queries

Data Subjects or Authorized Persons may submit queries about any information held in the Databases administered by NOUSWARE. Once NOUSWARE receives the query, it will take the steps described below. Please note that the query may be sent and/or processed through

the channels provided by NOUSWARE to handle matters related to privacy and Personal Data protection.

1. NOUSWARE will verify the identity of the applicant (Copy of the identity document or passport; and power of attorney when through an authorized person) to determine if they are legitimized to make the query and if they are, under reasonable parameters, the same subscriber.
2. If the applicant has the credentials and/or authorizations to make the query, NOUSWARE will then proceed to respond to it within the following ten (10) business days, counted from the receipt of the query.
3. If the applicant does not have the corresponding credentials and/or authorizations to query certain Personal Data, they will be informed within ten (10) business days, counted from the receipt of the query. In this case, the applicant will be given the option to demonstrate the capacity or authorization to make the query, providing additional information.
4. If in points 3 and 4 the query cannot be answered within the ten (10) business days, the applicant will be contacted to inform them of the reasons why the status of the request is "in process." However, the final response may not exceed five (5) business days following the expiration of the first term.
5. Responses will preferably be sent by email or by a means similar to the one in which they were received. In any case, the final responses to all requests cannot take more than fifteen (15) business days from the date the initial request was received by NOUSWARE.
6. NOUSWARE will keep a copy of all queries, in case the Data Subjects or Authorized Persons wish to have a copy of them eventually.

Complaints or Claims

Data Subjects or Authorized Persons may file complaints or claims regarding Personal Data with NOUSWARE and its Processors. Please note that claims may be sent through the channels provided by NOUSWARE. Please note that the claims may concern:

- Incorrect information.
- Absence of authorization or consent under the terms of Law 1581 of 2012 or, failing that, Article 10 of Decree 1377 of 2013.
- Outdated or partial information.
- NOUSWARE's non-compliance with its duties or obligations in accordance with current regulations.
- Lack of information integrity or security (citing sufficient reasons).
- Information that is wished to be suppressed.
- Revocation of information.

The handling of complaints and claims will be processed under the following rules:

1. NOUSWARE will verify the identity of the applicant to determine if they are legitimized to file the claim (Copy of the identity document or passport; and power of attorney when through an authorized person).

2. The claim must contain the following points: (i) name and surname of the Personal Data Subject; (ii) brief description of the facts, and (iii) reason or purpose of the claim. Additionally, if applicable, the relevant documentation or evidence must be attached to support the claim.
3. If the claim is incomplete, NOUSWARE may request the claimant to remedy the claim within the following five (5) business days, counted from the date of receipt of the claim. The claimant will have a term of two (2) months to provide and submit the required documentation; otherwise, it will be understood that the claimant has withdrawn the claim.
4. NOUSWARE, within two (2) business days following the date of receipt of the claim, will include in its Database a legend that says "claim in process" on the Personal Data that is the subject of the claim.
5. NOUSWARE will respond to the claim within the following fifteen (15) business days counted from the day following the date of its receipt. If it is not possible to attend to the claim within that term, the interested party will be informed of the reasons for the delay and the date on which their claim will be addressed. In any case, the [response to the] claim may not exceed eight (8) business days following the expiration of the first term.

Revocation of Authorization or Suppression of Personal Data

The data subjects can at any time revoke the authorization granted to NOUSWARE for the processing of their personal data or request the suppression of the same, provided that a legal or contractual provision does not prevent it. The request for revocation of processing authorization or suppression of personal data must be made through the means provided here by NOUSWARE for handling petitions, complaints, and/or claims.

For the above, it should be taken into account that the revocation of consent can be expressed, on one hand, totally in relation to the authorized purposes, and therefore NOUSWARE must cease any processing activity of the data; and on the other hand, partially in relation to certain types of processing, in which case it will be these processing activities that will cease, such as for advertising purposes, among others. In the latter case, NOUSWARE may continue to process the personal data for those purposes for which the data subject has not revoked their consent.

The Data Subject also has the right, at all times, to request NOUSWARE to suppress their Personal Data, provided that:

- They consider that the Personal Data is not being processed in accordance with the principles, duties, and obligations provided in the current regulations.
- They are no longer necessary or relevant for the purposes for which they were collected.
- The period necessary for the fulfillment of the purposes for which they were collected has been exceeded.

Please note that if the suppression request is appropriate, because there is no legal or contractual duty to maintain the Personal Data, the direct consequence is the total or partial

elimination of your Personal Data, without which in some cases you will not be able to obtain our services.

The right of suppression is not absolute, and NOUSWARE may deny the exercise of it when:

- There is a legal or contractual duty to remain in the Database.
- The suppression may hinder judicial or administrative actions related to fiscal obligations, the investigation and prosecution of crimes, or the updating of administrative sanctions.
- The Personal Data is necessary to protect the legally protected interests of the Data Subject.
- An action is to be carried out based on the public interest.
- Action is taken to comply with a legally acquired obligation by the Data Subject.

Requests for revocation of processing authorizations or for suppression of personal data will be governed by the same procedure established here for complaints and claims.

TRANSFER AND TRANSMISSION OF PERSONAL DATA

NOUSWARE may disclose to its affiliated, subsidiary, controlled, or subordinate companies the Personal Data over which it performs Processing, for their use and Processing by said related companies in accordance with the purposes established herein, those provided in the processing authorizations, and according to this Personal Data Protection and Processing Policy.

Likewise, NOUSWARE may deliver the Personal Data to third parties not related to NOUSWARE when: i) It involves contractors and/or suppliers in the execution of contracts or the provision of services for the development of NOUSWARE's activities; ii) By transfer, for any reason, of any line of business with which the information is related.

In any case, when NOUSWARE sends or transmits data to one or more Processors located within or outside the territory of the Republic of Colombia, the data processors must carry out the processing in accordance with the purposes, scopes, legal principles, and conditions described in these policies, which they declare and accept with the simple receipt of the personal data.

In addition to the above, the Processor must:

Comply with the legal obligations and those established herein in their capacity as Data Processor with respect to the Data Subject and NOUSWARE.

Adequately protect the personal data and the databases, as well as maintain confidentiality regarding the processing of the transmitted data.

NOUSWARE will require processors and its subsidiaries, affiliates, controlled, and subordinate companies to adopt and comply with the appropriate technical, human, and

administrative measures for the protection of Personal Data in relation to which said third parties/providers act as Processors.

NOUSWARE will not request authorization when the international transfer of data is covered by one of the exceptions provided in the Law and its Regulatory Decrees.

VALIDITY

This personal data protection policy is effective as of November 4, 2025, and supersedes any regulations or special manuals that may have been adopted prior to this one.

Any non-substantive modification of these policies will not be notified directly to the Data Subjects. However, a material modification of the purposes, the channels for exercising the rights of the data subjects, or NOUSWARE's contact data will be informed through NOUSWARE's official website www.nousware.ai, or via email to the Data Subjects, or by any other available means.

APPLICABLE LAW

This Personal Data Protection Policy is governed by the provisions of the current legislation on the protection of Personal Data referred to in Article 15 of the Political Constitution of Colombia, Law 1266 of 2008, Law 1581 of 2012, Decree 1377 of 2013, Decree 1074 of 2015, Decree 1727 of 2009, and other norms that modify, repeal, or replace them.

COLLECTION AND USE OF LOCATION DATA

Our applications or software collect location data from devices to offer location-based functionalities, such as interactive maps, marking 'Check-in / Checkout' on a client visit, etc. This information may be collected while using the apps and software or, if the user allows, also in the background. We do not share this data with third parties, except when necessary for the operation of the service, by legal obligation, or for analysis and reporting. The user can revoke the location permission at any time from their device settings.