

ANNEX – PERSONAL DATA PROCESSING THROUGH ARTIFICIAL INTELLIGENCE SYSTEMS

1. Purpose

The Companies, within the framework of their operational, commercial, administrative, and, in general, any activity aimed at fulfilling their corporate purposes, may develop and/or implement artificial intelligence systems ("AI Systems"). In the context of implementing the referred AI Systems, the Companies aim to optimize their processes and generate automated processing or administrative support of information or tasks (partially) in their organizational procedures. During this process, the Companies will collect, store, use, and circulate the personal data of data subjects so that it may be processed by the corresponding AI System and/or used to train it. This will be done in accordance with the activities and purposes of the processing described in this annex.

Consequently, this Annex to the Privacy Policy aims to describe the terms under which the Companies, through the tools listed below, as Controllers, carry out the Processing of personal data collected and/or processed through the AI Systems implemented by them, in order to ensure the protection of such information, proper handling of personal information, and the safeguarding of data subjects' rights.

Notwithstanding the above, for any matter not regulated in this Annex, all provisions of the Privacy Policy, as well as the country-specific Annexes applicable to the jurisdiction in which the data subject is located (or applicable to the data processing of the subject), shall apply.

2. Scope

The guidelines established in this Policy apply to the Processing of all personal data processed by the Companies through AI Systems, at any stage, either directly, by all their Employees, or indirectly, through their Processors, Joint Controllers, or Partners.

3. Data collected and/or processed by the Companies through AI Systems

The Companies, through the AI Systems they have implemented, will collect and/or process different categories of personal data, according to the operation of the AI Systems and the applicable data protection laws (as set forth in the Privacy Policy and country-specific annexes). Among the personal data that may be processed through AI Systems are:

a) Name, type, and identification number. b) Contact details (i.e., phone number and email address). c) Physical address. d) Job title or profession. e) Demographic, social, and/or geolocation/home data. f) Credit, asset, tax, or financial information. g) Interests

or preferences. h) Voice data, images, and/or videos. i) Electronic identification data or web credentials and website information, including technical information about connection means or internet service provider number. j) Data related to health status, physical condition, and similar. k) Biometric data. l) Data regarding vulnerability status.

4. Legal basis for processing

The Companies, through the AI Systems they implement, will only process personal data that has been previously, expressly, and informedly authorized by the data subject, either in writing, verbally, or by unequivocal conduct of the data subject, or such personal data that, in accordance with applicable data protection laws, may be processed under another legal basis. Such legal bases may include, without limitation: (i) the performance of a contract or agreement at the request of the data subject; (ii) the legitimate interest of the Companies to improve their services; and (iii) compliance with legal obligations by the Companies.

At the time the data subject grants authorization or their data is collected (when no authorization is required), the Companies will inform them of the purposes and processing to which their personal data will be subjected, as well as their rights and the means to exercise them. The data subject may revoke their authorization and/or request the immediate deletion of their personal data through the channels established in the Privacy Policy, unless there is a contractual or legal obligation to retain such data.

5. Purposes

The Companies will process Personal Data for the following purposes:

a) To provide, improve, and personalize the services offered through the AI Systems implemented by the Companies. b) To analyze data subjects' interactions with the Companies' various channels and tools to enhance the accuracy and efficiency of the AI Systems. c) To carry out activities aimed at identity validation and/or fraud prevention. d) To conduct market research, statistical, data analytics, and marketing activities, as well as business intelligence, customer service, including those that use artificial intelligence and big data tools, to analyze the viability of new products or services, improve service delivery, personalize service delivery, and improve commercial strategies. e) To process orders, requests, or any type of petition, claims, or inquiries submitted by the data subject through any available contact channels. f) To conduct satisfaction campaigns, statistical studies, and follow-up to measure data subjects' satisfaction, understand their preferences, and validate the quality of products and/or services provided by the Companies. g) To obtain information about

the data subject's browsing and search activity on websites and applications (managed or not by the Companies), to improve their experience in future interactions. h) To send communications by physical mail, email, mobile device, or any other communication means with commercial, advertising, or promotional information about products, services, events, promotions, and/or contests of a commercial or advertising nature, related to the Companies. i) To combine online information obtained from various digital platforms with information collected about the data subject to create a profile that can be used to provide personalized services. j) To determine the geographical location of the data subject. k) To provide information to oversight and supervisory authorities. l) To transfer or transmit Personal Data to third parties, who may be located inside or outside the country, in the context of strategic transaction structuring and completion. m) To verify and update Personal Data. n) To inform about changes in the Policy. o) To comply with legal and regulatory obligations.

6. ¿How are Children's and Sensitive Personal Data Processed?

Where absolutely necessary, the Companies may collect and/or process personal data of minors and/or sensitive personal data, informing data subjects (or their legal representatives in the case of minors) that, due to the sensitive nature and/or the minor's status, they are not obliged to provide such data unless required by law. Likewise, regarding sensitive data, the Companies will inform which sensitive data will be processed and the specific purposes of its processing through AI tools.

7. Access to and circulation of personal data

Access to personal data under the Companies' responsibility will only be granted to employees who need to access and process such data to perform their duties. The Companies will not share or disclose personal data to third parties with whom they have no relationship.

However, without prejudice to the provisions on transmission and/or transfer included in the Privacy Policy, where necessary to achieve the stated purposes, personal data collected and/or processed through AI Systems may be lawfully transmitted or transferred to third-party Providers or Partners, who may be located inside or outside the country and even in jurisdictions with different and inadequate levels of data protection. Usual recipients of personal data include Providers, Partners, Joint Controllers, and Processors, such as those providing software services, including cloud storage, AI system providers, and all entities with which the Companies have a contractual relationship.

Likewise, the Companies may transfer personal data to third parties, including their business partners, located in Colombia or abroad (including jurisdictions without adequate levels of personal data protection), for them to process it as independent Controllers or Joint Controllers. This may occur within strategic partnerships, asset sales involving personal data, marketing of databases, development of platforms or applications, and other activities stated in the authorization.

For all purposes, in response to access requests, the Companies may only disclose information to the data subjects, their successors, or legal representatives, public or administrative entities acting in the exercise of their legal functions or by court order, and third parties authorized by the data subject or applicable data protection laws. The Companies reserve the right to request additional documentation to verify the identity and authority of the requesting party.

8. ¿How long is personal data processed?

The Companies will store personal data for as long as necessary to fulfill the purposes and/or their legal or contractual obligations. After that period, the Companies will destroy or delete the personal data from their databases.

However, once the purposes for processing have been fulfilled, the Companies may anonymize the data. Once anonymization processes are completed—making the data unidentifiable and protecting data subjects' privacy and identity—the Companies may retain and use the anonymized information indefinitely, as it would no longer be subject to applicable data protection laws.

9. AI Systems implemented by the Companies

The Companies have implemented the following AI Systems, through which personal data processing is carried out:

AI SYSTEM NAME	DESCRIPTION	PURPOSE OF PROCESSING	START DATE
CXQI	Call and interaction analysis service with Users and Customers through Concentrix.	Improving customer service and support processes by identifying negative interactions or unresolved concerns.	April 2025