



# PRIVACY NOTICE OF SMART CAPITAL LTD.



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In order to comply with current legislation on data protection, we inform you that **SMART CAPITAL LTD**, a legal entity identified with Registration Number 2024-0016 and domiciled in the city of Santa Lucia, considered responsible and / or responsible for the processing of personal data, has developed its **PERSONAL DATA PROCESSING POLICY**, which embodies the corporate policies according to which the processing of your data is performed, the purpose of processing, your rights as owner, as well as the mechanisms provided by law for the exercise of such rights. This policy will be made available to you on the company's website at the link: <https://smartcapitalbroker.com> or upon written request to the e-mail address provided in this document.

Likewise, **SMART CAPITAL** informs that you, as the owner of the personal data, have the right to the privacy of the same, therefore, you are also informed that the personal and financial data collected are stored through secure and reliable technological means, which ensure to prevent and avoid the involuntary leakage of information, and to which the following treatments will be carried out: (i) Collect, store and verify personal data (name, identification, telephone, email, contact address); (ii) Use or circulate personal data for as long as reasonable and necessary; (iii) transfer to third parties personal data for marketing purposes, as well as transmit data to third parties and contractors for the proper provision of the service; (iv) perform verification of data to ensure their suitability and/or make collections, and share/consult information with credit bureaus if necessary; (v) delete the information in case it is no longer necessary.

The information collected may also have the following purpose, application or objectives: (i) for storage in **SMART CAPITAL**'s databases (ii) to establish, maintain and feedback the commercial relationship; (iii) to procure the effectiveness and security of the transactions carried out in **SMART CAPITAL** (iv) to procure the protection and exercise of your rights as well as those of **SMART CAPITAL** and/or its contractors to the extent possible in accordance with the treatment carried out by **SMART CAPITAL**; (v) to fully comply with the contracted services; (vi) to carry out activities necessary to manage the queries and claims submitted and direct them to the responsible area; (vii) to send information on commercial offers of **SMART CAPITAL** services as well as to develop marketing activities, statistics, research, commercialization, and/or other commercial service purposes provided or that may be provided or offered, as long as they do not contravene the legislation in Colombia; (viii) for the remission of any information of a financial, commercial, credit or service nature; (ix) to strengthen commercial relations by sending relevant information, taking orders, attending to requests, complaints and claims, as well as to carry out quality evaluations; (x) to verify

balances, proceed to invoice and collect contracted services; (xi) to verify compliance with legal and/or contractual obligations; (xii) to improve and promote the service provided by the company; (xiii) to comply with judicial or administrative requirements, and to comply with judicial or legal mandates; (xiv) to transmit personal data to third parties with whom contracts have been entered into in order to perform and comply with the service offered through **SMART CAPITAL**; (xv) to manage all the information necessary to comply with tax obligations and commercial, corporate and accounting records; (xvi) to send information about new products or services, news and other information that **SMART CAPITAL** deems convenient; (xvii) to send information about new products or services, news and other information that **SMART CAPITAL** deems convenient; (xviii) to send information about new products or services, news and other information that **SMART CAPITAL** deems convenient; (xviii) to send information about new products or services, news and other information that **SMART CAPITAL** deems convenient; (xvii) to share personal data with service companies or outsourcing companies that contribute to facilitate operations through **SMART CAPITAL**, including means of payment, insurance or payment management intermediaries; (xviii) for any requirement made by the Superintendence of Finance in compliance with the circulars issued for the processing of personal data; (xix) to corroborate with any other financial, commercial, civil, national or foreign entities, the credit rating or before credit bureaus at national or foreign level; (xx) to execute mandate activities in accordance with any contracts entered into by the owner of the data with **SMART CAPITAL**; (xxi) to bring it to the attention of contractors or employees of **SMART CAPITAL** for the purpose of carrying out activities related to the provision of education services; (xxii) to bring it to the attention of third parties who control matters related to hosting, software, source code and any other elements necessary for the development of the Platform; (xxiii) to analyze the behavior of information holders who have purchased services provided by **SMART CAPITAL** in order to provide a better service or develop commercial campaigns under the understanding of the holders on the Platform; (xxiv) to make phone calls, send text messages to cell phones, send emails or contact by the means and mechanisms provided on the Platform to the holders to offer the purchased services or new services of **SMART CAPITAL**; (xxv) if necessary, to transmit or transfer the personal data of the owners, who accept in advance that **SMART CAPITAL** may carry out or execute such legal acts; (xxvi) to share the personal data of the owners to legal entities abroad, shareholders, legal representatives or any other persons who so require in the development and execution of the services that were contracted by the owner and for the use of the Platform; (xxvii) to communicate with the owners of the information to know the user's experience and receive complaints, opinions, claims, as well as to make calls aimed at solving such experience in the education platform or any other platforms produced or created by **SMART CAPITAL**; (xxviii) to communicate with the owners of the information to know the user's experience and receive complaints, opinions, claims,

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In relation to sensitive data, **SMART CAPITAL** will only collect this type of data with prior authorization, when such authorization is necessary and proportional to the execution of the contractual relationship between you and third parties where the products and / or services required are purchased and offered, provided that the law allows access to sensitive information of this. You acknowledge and agree that your personal data may be made available to personnel in charge of the corresponding work, within the company, without excluding the possibility of being transferred to managers, consultants, advisors, persons and external offices as necessary to fulfill the aforementioned purposes.

At any time, you may exercise the rights granted by law, among which are: (i) know, update and rectify your personal data against the data controllers or data processors; (ii) request proof of the authorization granted to the data controller except when expressly excepted as a requirement for the processing, in accordance with the provisions of current legislation; (iii) be informed by the data controller or data processor, upon request, regarding the use that has been made of your personal data; (iv) revoke the authorization and/or request the deletion of the data when the processing does not respect the constitutional and legal principles, rights and guarantees; (v) file complaints with the Superintendence of Industry and Commerce for violations of the provisions of Law 1581 of 2012; and, (vi) access free of charge to their personal data that have been the subject of the processing.

