

PRIVACY POLICY- SUPPLIERS AND CONTRACTORS

At Softys ("Softys" or "Company") we are united under a single great purpose: develop brands that provide the best care that people need in their daily lives and at every stage of their lives.

This purpose inspires and mobilizes us to deliver the best care, through our brands and products and also through the way we operate and behave, which implies compliance with the applicable regulations on Personal Data Protection. For this reason, the Company adopts the following Personal Data Processing Policy ("Policy") of suppliers and/or contractors ("Holder" or "Holders"), in particular:

- Suppliers and contractors who are natural persons, and
- Representatives, contact persons, employees and, in general, any interlocutor of our suppliers and contractors who are legal entities and who have Softys as their Controller.

Below, Softys provides information about the type of personal data that may be processed and the purposes for which it will be used, as well as all the relevant and applicable information regarding the processing of personal data of the Holders.

Identification of the responsible for the processing of personal data:

Company: Softys S.A.

RUT: 77.460.467-7

Legal Representative: Gonzalo Darraidou

Address: Teatinos, 280, 6th floor, Santiago, Chile

E-mail address: misdatos@softys.com

I. Definitions

i) Data Controller or Data Processor: Any natural or legal person, public or private, who decides on the purposes and means of the processing of personal data, regardless of whether the data are processed directly by him/her or through a third party data processor.

ii) Data processing: Any operation or set of operations or technical procedures, whether automated or not, that make it possible in any way to collect, process, store, communicate, transmit or use personal data or set of personal data.

iii) International transfer of personal data: Processing involving the transfer of data outside the national territory.

iv) Personal data: Any information linked to or concerning an identified or identifiable natural person.

v) Personal data subject: Natural person, identified or identifiable, to whom the personal data concerns or refers to.

vi) Processor of personal data: Natural or legal person who processes personal data, on behalf of or in representation of the Data Controller.

vii) Sensitive personal data: This condition applies to personal data concerning the physical or moral characteristics of persons or to facts or circumstances of their private or intimate life, such as data revealing ethnic or racial origin, political, union or trade union affiliation, socio-economic situation, ideological or philosophical convictions, religious beliefs, data concerning health, human biological profile, biometric data, and information concerning to the sex life, sexual orientation and gender identity of a natural person.

viii) Transfer of personal data: Transfer of personal data by the Data Controller to another Data Controller.

II. Rights

1. Personal data owners have the following rights:

i) Right of access: To request and receive confirmation from the Data Controller, as to whether their personal data is being processed by the Data Controller, and if so, to have access to.

ii) Right of rectification: To request and obtain from the Data Controller to modify or complete your personal data when it is inaccurate, outdated or incomplete.

iii) Right to erasure: To request and obtain from the Data Controller to delete or eliminate your personal data, on the grounds provided in the regulations in force.

iv) Right to object: To request and obtain from the Data Controller, not to carry out a specific data processing, in accordance with the grounds provided in the current regulations.

v) Right to Block: To request the temporary suspension of the processing of your personal data if you have provided your data voluntarily .

vi) Right to portability of personal data: To request and receive from the Company a copy of their personal data in a structured, generic and commonly used electronic format, capable of being operated by different systems, and to be able to communicate or transfer it to another Data Controller. The Data Subject shall have the right to have his or her personal data communicated directly from Data Controller to Data Controller if it is technically possible and if the reasons are in accordance with the regulation in force.

2. Procedure for exercising rights

The Data Subject, or as appropriate, through his or her legal representative or agent,, may submit a request to the following e-mail address: misdatos@softys.com

3. Application requirements

The request must contain, at least, the following information:

i) Individualisation of the Holder and his legal representative or agent, if any, and authentication of her or his identity (copy of his identity card on both sides, with the National Identification Numervisible and the document number obfuscated).

ii) Provide an address or e-mail address or other equivalent means to communicate the response.

iii) Identification of the personal data or of the specific processing, in respect of which the right is being exercised, except in cases where the Data Subject exercises her or his right of access by requesting confirmation from the Company as to whether his data is being processed by the Company.

4. Compliance with the following mentions depends on the type of right exercised by the Data Subject:

- i) Requests of rectification must specify the precise modifications or updates to be made and, if applicable, include the background information supporting them.
- ii) Requests of erasure, must specify the reason invoked and attach the background information supporting it, as the case may be.
- iii) In the event of an objection, the data subject must state the grounds on which the objection is based.

5. Response to the request

Upon receipt of the request, the person in charge shall acknowledge receipt of the request and shall make a decision within the legal term.

The requests or requirements may be rejected or limited according to what is established in current regulations; including when the Holder cannot sufficiently prove his or her identity.

However, if Softys does not respond to the request within the time established in the Law or if the request is denied, the Data Subject may file a claim before the competent authority.

III. Basis of legality of the processing of personal data:

Softys will process the personal data of the Data Subjects with their consent or that of their representative or agent, as the case may be.

In addition, the Company may process the data of the Data Subjects without their consent when it is necessary to comply with legal or regulatory obligations. In this case, the processing carried out by Softys will be limited to that necessary for the fulfillment of these purposes.

IV. Type of personal data and purposes of processing

1. Types of personal, sensitive and special categories of data subject to processing.

Softys may collect, store, communicate, transmit, use or otherwise process the following categories of data:

- i) Identification data (e.g. first names, last names, signature, identity card number).
- ii) Contact data (e.g. telephone or cell phone number, e-mail address).
- iii) Financial, banking or commercial data.
- iv) Employment or professional data, such as position or profession.

Softys may also have access to and process sensitive or special categories of personal data, either by legal obligation or as part of the contractual relationship, namely:

- a) Health data, in cases of an incident or accident.
- b) Health data related to the existence of a disability when it is necessary to comply with legal obligations.
- c) Geolocation data related to the location of the Data Subject.
- d) Image regarding CCTV (closed-circuit television) recordings in the Company's facilities or meetings by digital means.

In the event that personal data of third parties must be provided in order to fulfill a specific purpose, if the Data Subject does not have the representation of the respective third party, he or she must previously obtain the consent of the respective Data Subject so that Softys may process such data in accordance with the applicable regulation and this Processing Policy, and assures Softys that he or she has obtained such consent.

The Company shall take measures to ensure that this information is accurate and up to date. To this end, the Company may ask Data Subjects to review and update the personal data it processes. In any case, the Holders must inform Softys about any change in their personal information, such as, for example, their address or marital status.

These data will be those:

- Provided directly by the Holders (e.g., information provided by suppliers or natural person contractors when entering into service provision contracts with the Company).
- Provided by third parties in accordance with personal data regulations (e.g. information provided by suppliers or contractors who are legal entities, regarding their representatives, employees, contact persons and/or, in general, any interlocutor acting on their behalf or representation).

2. Purposes of data processing of data subjects:

Softys processes the personal data of the Data Subjects to carry out the following purposes:

- i) To adopt pre-contractual measures of due diligence, evaluation, selection and certification of suppliers. For example, accrediting that the supplier is up to date in the payment of its social security obligations, that the company is duly incorporated; verifying that the person acting on behalf of the Supplier has sufficient representation; verifying the non-existence of possible conflicts of interest.
- ii) To enter into contracts that regulate the contracting relationship with the Company.
- iii) Manage the contractual relationship and ensure compliance with the contract signed between the parties.
- iv) Sending invitations to participate in bids, quotations or participate in events scheduled by Softys.
- v) Linking processes and creation of the supplier in Softys' information systems.
- vi) Establish business relationships to acquire goods and/or services through purchase/service orders or contracts.
- vii) Manage and control payments made for goods and/or services received.
- viii) Qualitative and quantitative evaluations of service levels received from suppliers.
- ix) Performing business operations, including the management and protection of its assets and/or other entities of the business group to which it belongs, strategic planning, project management, record keeping related to business activities, budgeting, accounting and, in general, the preparation of reports and documentation within the framework of the Company's operations.
- x) Review of tax and legal compliance with authorities.
- xi) Sending Softys communications.
- xii) Follow-up and management of pre-contractual, contractual and post-contractual stages.

xiii) Keeping control of the income of workers of suppliers to Softys' facilities for security purposes and control of the Company.

xiv) Perform reports and manage internal or third party audits.

xv) Manage queries, requirements, claims and/or complaints made through the channels enabled by the Company.

xvi) Conduct internal investigations in accordance with the provisions of the law and the Special Regulations for Contractors.

xvii) Management of judicial and administrative procedures.

xviii) Manage first aid attention if required.

xix) To satisfy legitimate needs of the Company, including the use of personal data to the extent necessary in the context of a merger, acquisition or sale of our assets; actions aimed at maintaining security measures in our computer systems, as well as actions aimed at maintaining the physical security of our offices, establishments and premises; the prevention of crime and fraud (compliance); the protection of the rights, property or safety of the Company or a third party; the exercise of legal rights and remedies, defense in court and management of any complaint or claim.

xx) Others specifically established in the authorizations granted by the representatives or workers of Suppliers and Contractors.

V. Conservation periods

The processing of personal data will be carried out for the entire period necessary for the fulfillment of the purposes outlined in this Policy. In particular, the Company will process data during the contractual relationship with suppliers and/or contractors.

The specific retention periods will depend on each of the categories of data that are subject to processing, but, in any case, **they will be stored and used after the contractual relationship with the supplier and/or contractor has ended in the following cases:**

i) In compliance with legal or regulatory obligations, or instructions from administrative authorities and/or judicial, arbitral or administrative rulings or resolutions; including compliance with legal or regulatory retention periods.

ii) In compliance with the statute of limitations of the legal actions that may be applicable (5 years as a general rule) to answer or present writings, documents and/or defense allegations before any requirement, claim, demand or action deducted against them, either from the Holder or from a third party.

When applicable, Softys shall take the necessary measures to effect the safe disposal of the personal data of the Data Subjects, by means of their destruction or anonymization.

VI. Safety measures

All processing of personal data has the appropriate security and confidentiality measures determined by the Information Technology (IT) area of Empresas CMPC and Softys, which are necessary and appropriate according to their categorization, in order to protect them against unauthorized or unlawful processing and against their loss, leakage, accidental damage or destruction, and to mitigate possible damages, in accordance with current regulations.

If, in accordance with the provisions of the following section of this document, the Company communicates certain personal data of the Data Subject to third parties, the data delivered shall

be those strictly necessary for the specific purpose that justifies the communication or assignment. Softys shall require that such third parties undertake to protect the confidentiality of your data and to treat them with at least the same level of diligence with which Softys treats and protects them, seeking to maintain the integrity, security and confidentiality of the personal data communicated or transferred to them.

VII. Communication, Assignment and International Transfers

1. Communication to Data Processors

In order to comply with the purposes mentioned in this Data Processing Policy, Softys may share the personal data of the Data Subjects with its third party providers (Data Processors), which may be located in Chile or abroad.

The data communicated shall be limited to what is necessary to comply with the services provided by the Data Processor. Softys will verify that these third parties meet the standards that guarantee an adequate level of personal data protection, in accordance with the provisions of the applicable regulations, and shall include in their contracts clauses that regulate the assignment and due confidentiality. For example, the Data Controllers' data may be shared with the following types of providers:

- i) Information technology service providers.
- ii) Cloud service providers.
- iii) Providers that provide security services to us.
- iv) Consultants, lawyers, accountants and other professional service providers.

2. Transfer of personal data to third parties

Likewise, the Company may transfer the personal data of the Data Subject to the following third parties, in Chile or abroad, who will act as Responsible Parties:

- i) Companies of the CMPC Group to which Softys belongs, including the parent company, subsidiaries and affiliated companies, which may be in Chile or abroad. The details of these companies can be found [in this link](#). In this case, the other companies of the CMPC Group may process the data of the Data Subject for the same purposes as those authorized to Softys as indicated in this Policy.
- ii) Regulatory, judicial or administrative authorities to comply with legal obligations and orders that they may give us in accordance with the law.
- iii) Corporate reorganization in the event of the sale or transfer of all or part of the Company's business or assets to a third party, or in the event of a corporate reorganization, we will transfer your personal data to the transferee of the business or assets, in which case we will make reasonable efforts for it to treat your personal data in accordance with the purposes of this Policy.

3. International transfers

In accordance with the above, Softys may internationally transfer the personal data of the Data Subject to Data Processors and to the third parties to whom it transfers the data.

Thus, for example, Softys may transfer personal data to jurisdictions where Softys and/or other companies of the CMPC Group operate, including Argentina, Brazil, Peru, Uruguay, Mexico, Colombia and Ecuador.

The international transfer may be carried out even when the third parties are located in countries where the levels of data protection are not equivalent to those offered by Chilean standards. Softys will contractually ensure that the third parties provide adequate levels of data protection in compliance with the applicable regulations.

VIII. Modification and Validity of the Policy

Softys may modify the Policy. However, when the modifications to this Policy are substantial (e.g. if they involve the processing of new categories of data, the use of data for new purposes or the transfer of data to other third parties), these shall be communicated in a timely manner to the Data Subjects at least thirty (30) calendar days prior to their entry into force, so that they may accept them.

In the event that a Data Subject does not agree with the changes to the Policy, he or she may revoke his or her consent and request Softys to delete his or her data through the channels indicated in the point **Procedure for exercising rights**. However, the right to revoke consent or request deletion will not proceed when Softys has a legal or contractual duty to process the data, in which case it will store them for the time necessary to fulfill such purposes.

Validity: This Policy is effective as of January 1, 2024, version No. 1.