

 		
Daikin Applied Latin America, L.L.C. & Subsidiaries in Latin America ("Daikin Applied" or Company")	Policies and Procedures	
Section: Legal	Subject No: 011-02	Pages No:
	Changes: Update of Definitions	6
Affair: Privacy and Protection of Personal Data	Date of issue:	It replaces:
	03-28-2024	5/22/2023
	Approved by:	Diana Marietti, Esq. Legal Director/Senior Counsel Secretary

DAIKIN APPLIED LATIN AMERICA, L.L.C., and its subsidiaries and affiliates, including entities of SAEG INTERNATIONAL GROUP, INC., in Latin America, hereinafter jointly referred to as "DAIKIN APPLIED", in accordance with the laws and regulations governing Personal Data protection matters, in force in the jurisdictions in which it operates (hereinafter, the "Laws"), hereby issues the following **Privacy and Personal Data Protection Policy** (hereinafter, the "Policy") through which it regulates the collection, storage, use, circulation, deletion, transmission and transfer of Personal Data or that Personal Data that can reasonably identify a person ("Owner" of Personal Data), such as the name, the person's signature, address, telephone number, date of birth, social security, identification number, credit information, and other sensitive information. Personal Data that you receive from the Owners of the information or from third parties through the different information collection channels that you have made available to the general public. Capitalized words within this Policy will have the meaning attributed to them in this document and / or in the applicable Laws in the corresponding jurisdiction.

This Policy is mandatory and of strict compliance for DAIKIN APPLIED and applies to all Personal Data registered in DAIKIN APPLIED databases.

1. Information collected, processing and purpose.

The Personal Data provided by the Owner, as well as those that will be collected and / or processed by DAIKIN APPLIED, may include the following: name, address, identification, telephone, email, bank account data and/or financial information, among other Personal Data required in relation to its commercial activity.

DAIKIN APPLIED will carry out the processing of Personal Data in accordance with the provisions of the Laws, as well as the provisions of the authorizations that may be granted, if applicable. The collection of Personal Data will be limited to those relevant and appropriate data for the purpose for which it is collected or required in accordance with the Laws. The Responsible (or Data Controller) and Data Processors may only collect, store, use or circulate Personal Data for as long as is reasonable and necessary, in accordance with the purposes that justified the Processing, taking into account the provisions applicable to the matter in question and the administrative, accounting, fiscal, legal and historical aspects of the information. Additionally, DAIKIN APPLIED may corroborate the veracity of the information provided, by any legitimate means.

DAIKIN APPLIED will process Personal Data with the purposes of:

1. Complying with its contractual obligations.

2. Making invitations to events and offering new products and services.
3. Managing procedures (requests, complaints, claims).
4. Providing contact information to the sales force and / or distribution network, telemarketing, market research and any third party with which DAIKIN APPLIED has a contractual relationship for the development of its activities.
5. Contacting the Owner of the information through telephone means to carry out surveys, studies and / or confirmation of Personal Data necessary for the execution of a contractual relationship.
6. Contacting the Owner through electronic means - SMS or chat to send news related to loyalty campaigns or service improvement.
7. Contacting the Owner via email to send statements, account statements or invoices in relation to the obligations arising from the contract between the parties.
8. Complying with the obligations contracted by DAIKIN APPLIED with the Owner of the information, in relation to the payment of wages, social benefits and other remuneration enshrined in the employment contract or as provided by law.
9. Analyzing applicants for employment and its compatibility with the profile of the available position.
10. Complying with control internal policies, audit processes, anti-money laundering and anti-corruption regulations that apply to it, among any other company policies.
11. Analyzing and evaluating the credit and financial history in order to approve credit under the contractual relationship.
12. Transmitting Personal Data outside the country to third parties with whom DAIKIN APPLIED has signed a data processing contract and it is necessary to deliver it to fulfill the contractual purpose.
13. Providing the services and / or supply the products offered by DAIKIN APPLIED.
14. Providing the information to third parties with which DAIKIN APPLIED has a contractual relationship and that it is necessary to provide it for the fulfillment of the contracted purposes.

DAIKIN APPLIED may disclose or use your Personal Data if the Law indicates it or to respond to requests from public and governmental authorities.

Processing of Sensitive Data:

The Owners of Personal Data will not be obliged to supply and / or authorize the processing of Sensitive Data (includes but is not limited to data related to racial or ethnic origin, political opinions, health, sexuality, among others). In the event that the Owners of the information supply any Sensitive Data and expressly authorize its use, the Sensitive Data collected will be processed in accordance with the provisions of the respective authorization, this Policy and the Laws.

2. Security measures in the Processing of Personal Data and / or Sensitive Data.

DAIKIN APPLIED, as Responsible (or Data Controller) and / or Data Processor of the of the Personal Data and / or Sensitive Data, will observe at all times the principles of legality, purpose, freedom, veracity, transparency, access and restricted circulation, security and confidentiality provided by the Laws. Likewise, DAIKIN APPLIED will comply at all times with the administrative, technical and physical security measures that allow the protection of Personal Data and / or Sensitive Data against damage, loss, alteration, destruction or unauthorized use, access or Processing of said Personal Data and / or Sensitive Data.

3. Transfer and Transmission of Personal Data and / or Sensitive Data

DAIKIN APPLIED may share with third parties, national or foreign, some or all of your Personal Data. Said third parties may be companies that are part of the DAIKIN APPLIED economic group, external professional advisers and / or other service providers that act as Data Processors in the name and on behalf of DAIKIN APPLIED. The Owner, by providing its Personal Data and / or Sensitive Data to DAIKIN APPLIED by any means, gives its consent for its transfer and transmission in the terms described above.

DAIKIN APPLIED will ensure that said third parties maintain adequate administrative, technical and physical security measures to protect their Personal Data and / or Sensitive Data, as well as that said third parties use their Personal Data and / or Sensitive Data solely and exclusively for the purposes for which were obtained and in accordance with this Privacy Policy and the Laws.

DAIKIN APPLIED may transfer your Personal Data and / or Sensitive Data to third parties in the cases and under the terms established by the Laws.

4. Rights of the Owners:

The Owners of the Personal Data have the right to:

1. Access free of charge to the data provided that have been processed;
2. Know, update and rectify its information against partial, inaccurate, incomplete, fractional, misleading data, or data whose processing is prohibited or has not been authorized;
3. Request proof of the authorization granted;
4. Present to the competent public authorities, complaints for infractions of the provisions of current regulations;
5. Revoke the authorization and / or request the deletion of the data, provided that there is no legal or contractual duty that prevents deletion;
6. Refrain from answering questions about Sensitive Data. The responses that deal with Sensitive Data or data on children and adolescents will be optional.
7. Any other right stipulated in the Laws.

Resources to exercise your rights:

The Owner of the information may request DAIKIN APPLIED the right to Know, Update, Rectify, Delete and Revoke its Personal Data and / or Sensitive Data ("Owner's Rights") by sending an email to the address privacy.latam@daikinapplied.com.

The request for Owner's Rights, must contain and be accompanied by the following:

1. Name of the Owner and address or other means to communicate the response to your request;
2. Documents that prove the identity or, where appropriate, the legal representation of the Owner;
3. Clear and precise description of the Personal Data and / or Sensitive Data with respect to which it seeks to exercise any of its Owner's Rights; and
4. Any other element or document that facilitates the location of the Personal Data and / or Sensitive Data of the Owner.

In the event that any of the Personal Data and / or Sensitive Data of the Owner is inaccurate or incomplete, the Owner, in addition to indicating the aforementioned, must indicate the modifications to be made and provide the necessary documentation that supports its request. The requests will be responded in chronological order of receipt, and within the time periods established by the Law. The response will be sent using the same method of contact unless another means is more expeditious and safer in the specific case.

For the above purposes, DAIKIN APPLIED, will always proceed in accordance with the provisions established by the Laws.

5. Conservation Period.

DAIKIN APPLIED will keep your Personal Data and / or Sensitive Data for the period that is reasonable and necessary to fulfill the purposes that justified the Processing thereof, unless the Laws require or allow a longer retention period. Once the purpose or purposes of the Processing have been fulfilled and without prejudice to legal regulations that provide otherwise, DAIKIN APPLIED will proceed to the deletion and / or elimination of

Personal Data and / or Sensitive Data in its possession.

6. Approval of Use

By providing your Personal Data and / or Sensitive Data to DAIKIN APPLIED by any means, you accept and consent to the use of the same as described herein. In case you do not agree with this Privacy Policy, please do not provide your Personal Data and / or Sensitive Data to DAIKIN APPLIED; however, you can exercise this right by sending an email to the address: privacy.latam@daikinapplied.com.

7. Modification of the Policy

DAIKIN APPLIED reserves the right to modify or update this Policy at any time, without prior notice, and to comply with changes to the Laws or to comply with any other applicable internal Policy or provision. Any modification will come into effect and will take effect against third parties from its publication in the corresponding media or from the date on which it is efficiently communicated to the Owner.

8. Entities of DAIKIN APPLIED Responsible for Processing de Personal Data, according to the applicable jurisdiction:

1. United States:

Daikin Applied Latin America, L.L.C.
7255 Corporate Center Drive, Suite # A
City: Miami; Country: FL, U.S. 33126

SAEG Engineering Group, L.L.C.
7255 Corporate Center Drive, Suite # A
City: Miami; Country: FL, U.S. 33126

2. Chile:

Daikin Airconditioning Chile, S.A.
Av. Del Valle Sur 577 - Oficina 603
Huechuraba
Citi: Santiago; Country: Chile.

SAEG International Group, SpA.
Av. Del Valle Sur 577 - Oficina 603
Huechuraba
Citi: Santiago; Country: Chile.

3. Colombia:

Daikin Airconditioning Colombia, S.A.S.
Calle 113 No. 7-45 Oficinas 1210-1214
Torre B Edificio Teleport Business Park P.H.
City: Bogota D.C. Country: Colombia

SAEG Engineering Group S.A.S.
Calle 113 No. 7-45 Oficinas 1210-1214
Torre B Edificio Teleport Business Park P.H.
City: Bogota D.C. Country: Colombia

4. Costa Rica:

SAEG Engineering Group S.A.
Centro Corporativo El Cedral

Torre 1, Edificio 1, San Rafael Escazu
City: San Jose; Country: Costa Rica

5. Dominican Republic:

SAEG Engineering Group, S.R.L.

Av. Tiradentes, #25
(Building) Torre Hipotecaria (Oficina) Local 101B.
Ensanche Naco
City: Santo Domingo; Country: Dominican Republic

6. Panamá:

SAEG Engineering Group Panamá, Inc.

PH Sortis Business Tower - Piso 15, Oficina I
City: Panamá City; Country: Panamá

SAEG International Group, Inc.

PH Sortis Business Tower - Piso 15, Oficina I
City: Panamá City; Country: Panamá

7. Perú:

Daikin Airconditioning Perú, S.A.C.

Ave. El Derby 250, Oficina 1403
El Derby de Monterrico | (Building) Edificio Capital
Derby. Santiago de Surco.
City: Lima; Country: Perú

SAEG Perú, S.A.

Av. Javier Prado Este No. 476 Piso 17, San Isidro
City: Lima; Country: Perú

8. Puerto Rico:

Daikin Airconditioning Puerto Rico, Inc.

#45 Calle Diana
Amelia Distribution Center
City: Guaynabo; Country: PR 00969

APPLICABLE ANNEX PERU

If the Personal Data subject is a resident of the Republic of Perú, the following specific provisions for Perú apply to our processing of Personal Data instead of the relevant sections specified in the Privacy and Data Protection Policy Daikin Applied Latin America L.L.C. In the event of a conflict between the relevant sections of the Policy and the provisions of this Addendum, the provisions of this Perú Addendum shall govern.

In the case of the "Contact Us" section, the information will be processed by Daikin Airconditioning Perú, S.A.C., domiciled at Av. El Derby 250, Of. 1403, Santiago de Surco and SAEG Perú S.A., domiciled at Av. Javier Prado Este No. 476. Piso 17, San Isidro (hereinafter collectively as "Daikin Perú") for an indefinite period and will be stored in the bank of data of "Web Users."

Daikin Perú will process your Personal Data for the following main purposes:

- Establish a communication channel with Daikin Perú to respond to queries, complaints and claims

made.

- Incorporate it in the Daikin Perú registry for statistical and historical purposes

You are informed that Daikin Perú may share and entrust the processing of your Personal Data to directly related organizations or persons, cloud service provider companies and companies dedicated to advertising or marketing. In these cases, Daikin Perú will guarantee that the processing of your data is limited to the previously authorized purposes, that it remains confidential and that the appropriate security measures are implemented. When the information is shared, DAIKIN APPLIED will update this Privacy Policy to indicate who the third-party recipients are.

It is recorded that: (i) your authorization is necessary to fulfill the aforementioned purposes; and, (ii) may exercise the rights provided for in Law No. 29733, by submitting a request to the email privacy.latam@daikinapplied.com with the subject "Personal Data Rights."

In case, you consider that you have not been attended, you can file a claim with the National Authority for the Protection of Personal Data, by contacting the Parties Desk of the Ministry of Justice and Human Rights located at Calle Scipión Llona No. 350, Miraflores, Lima, Perú.

Date of the last update to this Policy: March 28, 2024