

1. AIM

Inform the interested parties of Alphalegal Law and Tech Advisory SAS of its objectives, direction, principles and basic rules for managing the protection of personal data in the different processes that are executed in Alphalegal Law and Tech Advisory SAS

2. SCOPE

In this document you will find information of interest to you regarding the processing of personal data carried out by Alphalegal Law and Tech Advisory SAS and the rights that assist you under the Organic Law on Personal Data Protection of Ecuador published in the Official Registry Supplement 459 of May 26, 2021, its regulations and other applicable regulations.

The personal data protection policy applies to all Alphalegal Law and Tech Advisory SAS departments, parent company and branches, its observation and compliance is mandatory for permanent or occasional internal collaborators, internal and external interested parties, who are related to the personal data processing activities carried out by Alphalegal Law and Tech Advisory SAS.

3. PERSON RESPONSIBLE FOR THE PROCESSING OF PERSONAL DATA.

Alphalegal Law and Tech Advisory SAS informs its contact information as an actor responsible for the processing of personal data through the information shared below, the information in this policy does not replace the informative clauses derived from the processing of personal data, which may be expanded according to the personal data processing activity carried out by Alphalegal Law and Tech Advisory SAS.

Contact information:

Entity:	Alphalegal Law and Tech Advisory SAS Cía. Ltd.
RUC:	1793208514001
Legal representative:	Mgtr. Paulina Pineda Ordóñez.
Address:	Av. América and Diego Méndez, Quito, Pichincha, Ecuador
Email:	info@alphalaw.ec

The personal data processing activities carried out by Alphalegal Law and Tech Advisory SAS are managed through a catalogue and reviewed at least once a year or when necessary due to regulatory or legal issues that may update their status [in case of publishing the policy, a link must be generated and the catalogue of processing activities published]

4. PURPOSE

Alphalegal Law and Tech Advisory SAS informs that it processes personal data for different purposes and that they correspond to one or more processing activities that it carries out. These activities are accessible to the owners and are reviewed at least once a year or when necessary due to regulatory or legal issues that may update their status.

5. LEGITIMATION

The processing of personal data is carried out to comply with legal obligations of Alphalegal Law and Tech Advisory SAS, or when the purpose of the processing of personal data requires the consent of the owner, which will be granted through a clear affirmative action and free of defects.

The legal, regulatory, contractual, technical and information security requirements will be documented and included in the adaptation process that Alphalegal Law and Tech Advisory SAS carries out and will permanently improve.

6. DATA RETENTION

The personal data processed by Alphalegal Law and Tech Advisory SAS will be kept for the time necessary to fulfill the purpose for which they are collected, in addition to the periods established in the current legal regulations for the conservation of documents or records for legal obligations in Ecuador.

7. DATA TRANSFER

Alphalegal Law and Tech Advisory SAS generally does not transfer personal data to third parties, except for legal obligations identified and communicated to the owners, which may include reports from control entities, information required by a legal authority or a Public Entity within the scope of its powers.

Alphalegal Law and Tech Advisory SAS establishes as a fundamental principle the protection of personal data and therefore its treatment is protected by the principles

established in the current Legal regulation, but above all in loyalty, transparency and confidentiality, establishing adequate levels of security of personal data through controls based on analysis of information security risks of each personal data processing activity.

8. RIGHTS OF THE OWNERS

The rights that Alphalegal Law and Tech Advisory SAS recognizes to the holders are the following:

- Right of access
- Right to rectification and updating
- Right to erasure
- Right to object
- Right to suspension of treatment

Whenever the cases established in the current legal norm or its regulations occur, you can direct your request using the information provided in section 3.

For the establishment of controls, the following documents will be considered:

9. GENERAL DATA PROTECTION POLICY

Alphalegal Law and Tech Advisory SAS is committed to identifying, analyzing and maintaining a clear and transparent relationship with the owners of personal data, to respond to their exercise of rights and to meet their information security requirements so that all activity in which personal data is processed by Alphalegal Law and Tech Advisory SAS is legally based.

Alphalegal Law and Tech Advisory SAS will adopt international best practices or duly recognized and documented standards regarding personal data protection, will make its decisions based on an information security risk management approach, will establish action plans to design and implement effective and efficient controls in its processes that allow providing products and services with adequate levels of confidentiality, integrity and availability, investing the necessary resources to preserve a level of security in accordance with the needs and expectations of relevant stakeholders; fostering customer trust; and committing to continuous maintenance and improvement.

10. CONTINUOUS IMPROVEMENT

Alphalegal Law and Tech Advisory SAS is committed to maintaining and, where appropriate, continuously improving the security levels for the different personal data processing activities.

Furthermore, Alphalegal Law and Tech Advisory SAS is committed to increasing the level of proactivity and culture, with respect to the protection of personal data;