

PRIVACY POLICY

1. Purpose

To establish the guidelines for protecting the personal data and sensitive information managed by the organization, ensuring its confidentiality, integrity and availability. This policy seeks to ensure compliance with the applicable legal and contractual requirements within the framework of the Information Security Management System (ISMS).

2. Policy

At Mindfactory, we firmly believe in the fundamental rights to privacy and personal data protection. Personal data is any information that identifies us directly (for example, a name) or indirectly (information that can also be used, in some way, to identify someone; for example, a home address, telephone number or IP address).

This Privacy Statement sets out how Mindfactory protects, safeguards and processes personal data in connection with the processes we carry out with our clients, prospective clients, suppliers, prospective suppliers and third parties and, where these are legal entities, with their legal representatives or contact persons (hereinafter, collectively, "Clients, Suppliers and Third Parties"). Accordingly, under the applicable personal data protection regulations in force (hereinafter, "Applicable Regulations"), please note that our relationship with our Clients, Suppliers and Third Parties involves Mindfactory accessing and processing personal data.

In this regard, we are committed to protecting the privacy and personal data of our Clients, Suppliers and Third Parties, and to ensuring compliance with the Applicable Regulations, in accordance with the regulations of the countries where Mindfactory companies are located. We process personal data lawfully, fairly and transparently, for specified, explicit and legitimate purposes, and the data processed is adequate, relevant, proportionate and limited to what is necessary in relation to those purposes. In addition, we are required to keep data accurate and up to date, and to store it in a form that allows easy identification, only for as long as necessary to fulfil the purposes of the processing.

Categories of Personal Data

We collect personal data through our internal onboarding processes for Clients, Suppliers and Third Parties and, where applicable, through contracting and during our relationship with them. Accordingly, and in order to comply with the principles of proportionality and data minimization, we collect only the personal data strictly necessary to fulfil our relationship with our Clients, Suppliers and Third Parties.

The categories of personal data used are as follows:

- Identification and contact data.
- Financial and asset data.
- Employment data.

If, for any reason, the personal data requested for a specific process cannot be shared with us, and such data is necessary to fulfil the contractual relationship or our legal obligations, we will not be able to provide our services or establish a business relationship. In addition, we ask our Clients, Suppliers and Third Parties to keep their personal data up to date whenever it changes, and to always provide us with complete, truthful and accurate information, so that the necessary processes can be managed in a timely and effective manner.

Purposes of Personal Data Processing

At Mindfactory, we are committed to the principle of purpose limitation; therefore, we only process the personal data strictly necessary to fulfil the legal relationship we have with our Clients, Suppliers and Third Parties.

Legal Basis for Processing

We will process personal data on the basis of legitimate interest, for the sole purpose of ensuring the continuity of that relationship and for as long as it lasts. Thereafter, the data may be retained in blocked form for the periods arising from the statute of limitations applicable to legal actions related to that processing.

Personal data will be obtained directly from Clients, Suppliers and Third Parties or indirectly through the engagement lead, partners, directors or attorneys-in-fact, among others, or through authorized transfers or publicly accessible sources, always for the purpose of carrying out the internal processes necessary to accept them as clients, suppliers or third parties of Mindfactory.

Department Responsible for Handling Questions and Complaints

In compliance with the Applicable Regulations, Mindfactory has designated the Administration and Finance Department as the department responsible for handling questions and complaints from data subjects, through the following email address: administracion@mindfactory.ar

Confidentiality and Security of Personal Data

At Mindfactory (this also applies to anyone involved in any part of the processing of the information), we are bound to keep personal data confidential. This obligation continues even after the relationship with Mindfactory has ended. The confidentiality obligation ends upon the prior, informed, express and unequivocal consent of the data subject, a final and binding court order, or well-founded reasons relating to national defense, public safety or public health, without prejudice to the right to professional secrecy.

Furthermore, to reasonably prevent its misuse or improper disclosure, we have implemented physical, technical and administrative security measures in accordance with the Applicable Regulations.

Communication/disclosure of personal data

In accordance with the Applicable Regulations and Mindfactory's internal policies and procedures, personal data may be communicated or disclosed to third-party recipients. The third-party recipient of the personal data becomes a data controller under the Applicable Regulations and must process the personal data in compliance with the information previously provided by Mindfactory.

Processing carried out by the third-party recipient must comply with the provisions of this Privacy Statement.

The communication or disclosure must be formalized through mechanisms that demonstrate that Mindfactory informed the third-party recipient of the conditions under which the data subject consented to the processing of their personal data.

Changes to this Statement

We may unilaterally amend this Privacy Statement whenever we deem it necessary, giving notice of the change on our website. Any change or amendment to this Privacy Statement will be recorded in the "Updates" section at the end of this document.

Retention Period

Personal data will be stored only for the period reasonably necessary to fulfil the purposes of use described in this Privacy Statement, or for a maximum of 10 years from the end of the legal relationship.

3. Reviews

At least once a year, the ISMS Committee must review this policy and record the review in the change history.

4. Contact

For any inquiries, questions or incident reports related to this policy, employees may contact the Information Security Officer (ISO) at mariano.ozamis@mindfactory.ar, who will provide the necessary assistance and guidance.

5. Compliance

If non-compliance with the provisions of the Policy set out in this document is verified, management may take the measures it deems appropriate to ensure due compliance.

6. Change History

Date	Revision	Description of change	Owner
12 Nov 2025	00	Creation	ISO

Approved by:	CTO
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