



## Privacy and Safety Policy

### PRIVACY NOTICE

This Privacy Notice (“Notice”) of Grupo Financiero Davivienda, consisting of the following entities: Corporación Davivienda (Costa Rica) S.A., Banco Davivienda (Costa Rica) S.A.; Davivienda Puesto de Bolsa (Costa Rica) S.A.; Davivienda Seguros (Costa Rica) S.A.; Davivienda Corredora de Seguros (Costa Rica) S.A.; and Davivienda Leasing (Costa Rica) S.A.; (hereinafter, “DAVIVIENDA”), is applied to all the information that DAVIVIENDA collects through its various channels.

DAVIVIENDA, as the Data, acknowledges the importance of the privacy of customer information; that is why this privacy notice is hereby made available.

DAVIVIENDA is an entity supervised by the provisions issued by the National Supervision Council of the Financial System (CONASSIF – Spanish acronym), the General Superintendency of Financial Entities (SUGEF – Spanish acronym), the General Superintendency of Securities (SUGEVAL – Spanish acronym), and the General Superintendency of Insurance (SUGESE – Spanish acronym).

#### 1. Rights of the Data Subjects

- a) To contact DAVIVIENDA, through its established channels, which are indicated in this Privacy Policy, with the object of accessing, updating, and/or rectifying its Personal Data. This right may be exercised with respect to, among others, partial, inexact, incomplete, and fractioned data that may be misleading or to information whose processing is expressly prohibited or has not been authorized;
- b) To request proof of the authorization granted to DAVIVIENDA except when, according to the Law, the processing being performed does not require it;
- c) To be informed by DAVIVIENDA, upon prior request through the channels established by DAVIVIENDA, on the use that DAVIVIENDA has given to your Personal Data;
- d) To revoke the authorization and/or request the erasure of data when in its processing it has not respected the principles, rights, and constitutional and legal guarantees. Such right will not apply when DAVIVIENDA, because of the law, is required to keep the data or is required to keep the commercial relationship in all respects.
- e) To access, free of charge, through the channels provided by DAVIVIENDA, your Personal Data that has been subject to processing.



## 2. Data Processing Purposes

The purposes to Process Personal Data provided by our customers and users are:

### a. Mandatory

(i) To develop the processes that will be required for the proper provision of the contracted products and/or services.

(ii) To evaluate, keep, improve, and further develop the contractual relationship, including offering new products and/or services related to the contracted products and/or services.

(iii) To update the provided data with information available from Information Providers or from any other person, entity, or organization that manages or processes databases with the purposes legally defined for this type of entities.

(iv) To develop and implement fraud prevention tools.

(v) To share financial information related data, including using and updating contact information with specialized collection firms to carry out the collection and recovery of the obligations incurred and other services deemed needed or supplementary and processing the expired portfolio using the legal mechanisms and non-judicial means permitted by the legal system.

(vi) To assess the solvency of the debtor, its payment behavior, and collection of the corresponding installments, fees, and charges both extrajudicially and judicially, if applicable.

(vii) Additionally, Davivienda may process personal information in coordination with its head office in Colombia and with other entities of the same economic group solely for corporate, statistical analysis, risk assessment, fraud prevention, and product and service improvement purposes.

### b. Non-Mandatory

To develop customer commercial profiling activities, as well as commercial, advertising, and marketing campaigns related with products and services of Grupo Financiero Davivienda (Costa Rica) S.A. and with commercial business partners that may complement or enhance the offering of said products and services which will be communicated to customers and users in a timely manner.

Among said purposes are: (i) to perform statistical or behavioral studies regarding interests and preferences related to the contracted products and/or services; (ii) to conduct commercial prospecting to identify the needs and interests to be satisfied with the products and/or services to be offered, and (iii) to provide information on events, updates, promotions, advertising, and loyalty programs by email, postal mail, landline, mobile phone, fax, SMS, MMS, social media, or similar channels; (iv) to measure the level of satisfaction of the contracted products and/or services; (v) to share information with entities of the Grupo Financiero Davivienda (Costa Rica) S.A.



### **3. Information Transfer**

Davivienda may transfer or allow access to personal data to the head office of Grupo Davivienda in Colombia and to the other entities that are part of the same economic group when needed for corporate operations, risk management, regulatory compliance, statistical analysis, or product and service improvement as allowed by the data protection laws.

Data processing within the same economic group, including the head office in Colombia, is considered internal processing for the purposes of personal data protection laws and is not considered third-party transfer.

Davivienda will not disclose customer information to any external organization without customer consent, if required by law, or if the customer has not been previously informed of such disclosure.

It is possible that, on certain occasions, Davivienda may be requested to disclose information about its customers to a governmental or judicial body, or to regulators, but Davivienda will only provide said information before the competent authority.

Davivienda seeks to keep its customer information up to date.

Davivienda has strict security systems designed to avoid unauthorized access to customer information by any person, including Davivienda personnel.

It is required that all the companies of the Group, or Davivienda personnel, and all third parties with authorized access to customer information, specifically comply with the confidentiality obligations of Davivienda.

### **4. Customer Service Channels for Inquiries and Complaints**

Davivienda establishes the following as customer service channels:

Chat: <https://bienvenido.Davivienda.cr/wps/portal/personasCR/nuevo>: Login to chat for customers / Option: online support / Chat.

Branches nationwide.

Call Center: Nationwide Customer Service Line: 2287-1111