

## Privacy Policy

### PRIVACY POLICY OF ARAMBURU MATRIZ S.A.C

#### introduction

Aramburú Matriz S.A.C, has a firm commitment to respect and compliance with all legal and regulatory provisions that apply to them. Likewise, you understand that personal data, being an integral part of people's privacy; and since they are also fundamental to our activity, they must be treated in such a way that they not only imply compliance with the legal system, but, in addition, measures must be taken to generate an environment of trust and security in the public regarding said treatment.

#### II.Objective

The purpose of this Policy is to make known to the public our commitment to the protection of your personal data, as well as the guidelines under which we process them in the exercise of our commercial activities, the purpose for which we do so, as well as such as the procedures so that their owners can exercise the rights of access, rectification, cancellation, revocation, information and opposition provided for in the Personal Data Protection Regulations.

#### III.Scope

This Policy applies to all personal data processing activities carried out by Aramburú Matriz S.A.C (hereinafter Arama). It will also apply to those people or companies that Arama requires the processing of personal data for which it is responsible.

#### IV.Definitions

The following paragraph is inserted in this chapter: The terms that are capitalized in this policy are defined in Annex No. 1.

The definitions that need to be incorporated into the document for a better understanding of it should be included in Annex No. 1 (see at the end of this document).

#### V. Guiding Principles

Arama is committed to respecting the guiding principles established in the Personal Data Protection Regulations.

Which we will detail below:

#### Principle of legality:

The processing of personal data is carried out in accordance with the provisions of the law, and the collection of personal data by fraudulent, unfair or illicit means is prohibited.

#### Consent principle:

For the processing of personal data, the consent of the owner must be obtained, unless there is one of the exceptions provided for by law. Said consent must meet the requirements of being free, prior to its collection or processing, express and unequivocal, and informed.

#### Purpose principle:

Personal data must be collected for a specific, explicit and lawful purpose, and its processing must not extend to any purpose other than that for which it was collected.

#### Proportionality principle:

The processing of personal data must be adequate, relevant and not excessive to the purpose for which it was collected.

#### Quality principle:

The personal data that will be processed must be true, accurate and, to the extent possible, updated, necessary, relevant and appropriate with respect to the purpose for which they were collected.

#### Safety principle:

The owner of the personal data bank and the person in charge of its processing must adopt the necessary technical, organizational and legal measures to guarantee the security of personal data.

#### Resource provision principle:

The owner of personal data must have the necessary administrative or jurisdictional means to claim and enforce his rights, when these are violated by the processing of his personal data.

#### Adequate protection level principle:

For the cross-border flow of personal data, a sufficient level of protection must be guaranteed for the personal data to be processed or, at least, comparable to that provided for by the Personal Data Protection Law or by international standards in the subject.

It should be noted that this list is illustrative in nature and must be complemented with the provisions of current regulations.

#### SAW. Purpose of the Processing of Personal Data

Arama processes personal data of collaborators, clients and potential clients, suppliers and all those people who visit our facilities and/or have any legal or commercial relationship with our company, in order to comply with current legislation, execute the relationship. legal that the owners of the personal data maintain with our company, as well as protecting the safety of our clients and collaborators.

The processing of personal data for any other lawful purpose other than those mentioned above is duly informed to the holders of personal data, requiring specific authorization, in compliance with the principle of consent.

#### VII. Customized treatment

Arama may entrust all or part of the processing of personal data for which it is responsible for the processing or which form part of the personal data banks of which it is the owner, to legitimate suppliers for the fulfillment of its business activities, who are located in the Peru or abroad, including the company EMBLUE PERU S.A.C. with RUC: 20562685538 and with address at Cal. Coronel Inclan No. 237, for processing, equipment and technological solutions purposes.

Learn about the list of suppliers that may receive personal data as Arama's data processors:

Persons in charge of processing Personal Data of Aramburú Matriz S.A.C.

MONGODB INC

Tax Identification Number: 261463205

SENDGRID (Brand of TWILIO INC.)

Tax Identification Number: 262574840

EMBLUE PERU S.A.C.

RUC: 20562685538

MAILCHIMP

c/o The Rocket Science Group, LLC

675 Ponce De Leon Ave NE

Suite 5000

Atlanta, GA 30308 USA

[www.mailchimp.com](http://www.mailchimp.com)

Tax ID: US EIN 58-2554149

MESA 247 S.A

20552536259

Av. Coronel Francisco Bologne No. 433 Dpt. 702 Urb. Surquillo

COVERMANAGER (Restaurant Booking & Distribution Services S.L.)

Registered Office: Avenida de la Constitución nº24 4th floor (41001, Seville)

NIF: B90227976

#### VIII. Consent

Arama will require the free, prior, express, unequivocal and informed consent of the owner of the personal data for the processing of the same, except in the cases of exception expressly established by Law.

Arama will not require consent to process your personal data obtained from publicly accessible sources, whether free or not for the use for which they were made public; Likewise, you may process your personal data or data from non-public sources, provided that these sources have your consent to process and transfer said personal data.

#### IX. Transfer of personal data

In cases where the data owner has expressly authorized it, Arama may transfer personal data locally and internationally to Group companies:

NAME COMPANY NAME RUC ADDRESS

ALFRESCO AAP CORPORATION S.A. C. 20549253360 JR. FLORA TRISTAN 310 - BLOOM TOWER INT. 2101 MAGDALENA DEL MAR

ARAMA ARAMBURU MATRIZ S.A. C. 20523939140 JR. FLORA TRISTAN 310 - BLOOM TOWER INT. 2101 MAGDALENA DEL MAR

ARMONICA CAFÉ SALUDABLE S.A.C. 20600520891 JR. FLORA TRISTAN 310 - BLOOM TOWER INT. 2101 MAGDALENA DEL MAR

GIAMEN HANDLES 20424718361 AV. MALECON DE LA RESERVA 610 - CC LARCOMAR INT 402

THE GINA AND MICHELL PLANT S.A. C. 20510362048 CALLE LAS FABRICAS 242 URB. LA VILLA INDUSTRIAL AREA - CHORRILLOS

CALA GRESCO S.A.C. 20252796623 CIR. ROAD COST. GREEN ESP B2 CDR1 - BARRANCO

POPULAR FROM HERE AND THERE TAPERIAS PERUANAS SAC 20557980106 JR. FLORA TRISTAN 310 - BLOOM TOWER INT. 2101 MAGDALENA DEL MAR

BAAN UKUSNA COMERCIAL S.A.C. 20554461728 JR. FLORA TRISTAN 310 - BLOOM TOWER INT. 2101 MAGDALENA DEL MAR

LA CALETA GROUP LA CALETA S.A.C. 20605012052 JR. FLORA TRISTAN 310 - BLOOM TOWER INT. 2101 MAGDALENA DEL MAR

QUINOA NATURA COOK S.A.C. 20551585507 JR. FLORA TRISTAN 310 - BLOOM TOWER INT. 2101 MAGDALENA DEL MAR

VISTA CORONA RFT PERU S.A.C. 20610575880 JR. FLORA TRISTAN 310 - BLOOM TOWER BUILDING 22nd FLOOR MAGDALENA DEL MAR

BAAN UKUSNA COMERCIAL S.A.C. 20554461728 JR. FLORA TRISTAN 310 - BLOOM TOWER BUILDING 22nd FLOOR MAGDALENA DEL MAR

FESTIVAL, PROVECHO, LA TRUEDA, CHACHO RESTUARANTES VIRTUALES S.A.C. 20606759038 AV. VICTOR ANDRES BELAUNDE NRO. 147 INT. 504 LIMA - LIMA - SAN ISIDRO

REPEAT COMIDAS PREPARADAS S.A.C. 20606742062 AV. VICTOR ANDRES BELAUNDE NRO. 147 INT. 504 (UNIT T2) LIMA - LIMA - SAN ISIDRO

as well as its commercial allies, to send you advertising, carry out surveys, invitations to events, know your consumer preferences, prepare statistics and/or behavioral studies.

Likewise, Arama may transfer personal data to legally empowered public entities within the scope of its powers, in compliance with current or future regulations, or at their request, or when there are any of the exceptions provided for in the law.

X.Rights of the Holders

In accordance with the Law, owners of personal data have the following rights:

1. Right of Access and information: As a consequence of the right of access, the owner of personal data has the right to obtain information about himself that is subject to processing in data banks owned by Arama. The right to information, for its part, grants the owner the right to know the purpose for which his or her data will be processed, the existence of the data bank in which it will be stored, the identity and address of the owner of the data bank and the those in charge of processing, if the transfer of personal data will occur and to whom, the retention time, among others.
2. Right to rectification, update and inclusion: The owner of personal data has the right to update, include and rectify his or her personal data subject to processing by Arama when they are partially or totally inaccurate, incomplete or when an omission has been noted. , error or falsehood.
3. Right of Cancellation or Deletion: The owner of personal data may request the cancellation or deletion of his or her personal data not related to or necessary for the execution of Arama's position obligations provided for in the signed contracts or those provided for by current regulations.
4. Right to Oppose: The owner of personal data may object to the processing of his or her personal data at any time. The opposition will proceed to the extent that the treatment has no contractual or legal justification.
5. Right of revocation: The owner of personal data may withdraw the consent previously granted at any time. The revocation will not cover the uses and/or treatments that can be carried out in the scenarios authorized by the regulation.

#### XI. Procedure for the exercise of the rights of the Owner of Personal Data

The Owners may revoke their consent or exercise their legal rights by contacting the email: [contactibilidad@arama.com](mailto:contactibilidad@arama.com), indicating their full name and ID.

In the event that the owner of the personal data requires to exercise his or her rights through a representative, he or she must send a power of attorney legalized by a notary public that authorizes him or her as such and his or her identification document.

#### XII. Term of Personal Data Processing

The personal data processed by Arama will be stored indefinitely, without prejudice to the data owner being able to exercise the rights mentioned in section X of this policy at any time.

### XIII. Security of Personal Data

In compliance with current regulations, Arama adopts the appropriate legal, organizational and technical measures to guarantee the security of personal data, preventing its alteration, loss, improper processing or unauthorized access.

For this purpose, it makes available all the necessary human and technological resources, applying them in proportion to the nature of the data stored and the risks to which they are exposed.

Arama will only process personal data that is stored in repositories that meet the security conditions required by current regulations on the protection of personal data.

### XIV. Modifications

If any change or modification of this Policy occurs, the current text thereof will be published on our web portal: [www.arama.pe](http://www.arama.pe) in the Privacy Policies section.

### Annex No. 01

#### Definitions

The words and terms defined below, when they are capitalized as in their respective definitions below, whether or not necessary in accordance with the spelling rules of capitalization, and regardless of the place in this policy in which they are used, or if they are used in a person, number, manner, tense or grammatical variable, as necessary for the proper understanding thereof, they will have the meanings that are assigned to each of said words or terms below. :

1.1. Personal Data Protection Law. Law 29733 and its amendments.

1.2. Regulations of the Personal Data Protection Law. Supreme Decree No. 003-2013-JUS and its amendments.

1.3. Personal data bank. Organized set of personal data, automated or not, regardless of the support, whether physical, magnetic, digital, optical or others that are created, whatever the form or modality of its creation, formation, storage, organization and access.

1.4. Sensitive data: Personal data consisting of biometric data that in itself can identify the owner, data referring to racial and ethnic origin; economic income, political, religious, philosophical or moral opinions or convictions; union membership; and information related to health or sexual life.

1.5. Owner of personal data. Natural person to whom the personal data corresponds.

1.6. Owner of the personal data bank. Natural person, legal entity under private law or public entity that determines the purpose and content of the personal data bank, its processing and security measures.

1.7. Transfer of personal data. Any transmission, supply or manifestation of personal data, of a national or international nature, to a legal entity governed by private law, to a public entity or to a natural person other than the owner of personal data.

1.8. Processing of personal data. Any technical operation or procedure, automated or not, that allows the collection, recording, organization, storage, conservation, elaboration, modification, extraction, consultation, use, blocking, deletion, communication by transfer or dissemination or any other form of processing that facilitates access, correlation or interconnection of personal data.”

1.9. Arch Rights. Rights held by every natural person as the owner of personal data.

1.10. Request to exercise ARCO Law. It is the request for access, rectification, updating, inclusion, cancellation, deletion or opposition, made by the owner of personal data regarding his or her information.

1.11. Consent of the interested party: is any free, specific, informed and unequivocal expression of will by which the interested party accepts, either by means of a declaration or a clear affirmative action, the processing of personal data that concerns him or her.