

Colombia Recruitment Privacy Addendum

Plata. S.A. Compañía de Financiamiento

Hi! This Colombia Recruitment Privacy Addendum (“Colombia Addendum”) supplements the Global Recruitment Privacy Notice of Banco Plata, S.A., Institución de Banca Múltiple (the “Global Notice”) and applies to candidates, applicants, prospective employees and employees who apply from Colombia, reside in Colombia, or apply to positions located in Colombia. This Colombia Addendum is issued in compliance with Law 1581 of 2012, Decree 1377 of 2013 (incorporated into Decree 1074 of 2015), Law 2300 of 2023, and all other applicable Colombian data protection regulations (collectively, the “Colombian Data Protection Framework”). In case of conflict between the Global Notice and this Colombia Addendum, this Colombia Addendum shall prevail to the extent required by Colombian law.

For general matters relating to data subject rights, procedures, principles, security measures, sensitive data, international transfers, and retention, the Plata Colombia Data Protection Policy (“Colombia Privacy Policy”) applies and is incorporated herein by reference. The Colombia Privacy Policy is available at the section “Documentos legales” in plata.co

1. Local Data Controller

For recruitment activities in Colombia, the local data controller (**“Responsable del Tratamiento”**) is:

- Plata S.A. Compañía de Financiamiento (**“Plata Colombia”**)
- Address: Carrera 11B # 99-25, Piso 4 Bogotá D.C., Colombia
- Email: ayuda@plata.co
- Website: plata.co

2. Legal Basis for Processing

Under Colombian law, the processing of personal data generally requires the prior, express, and informed authorization (**“Autorización”**) of the data subject (**“Titular”**), unless an exception established by law applies. In connection with recruitment activities, Plata Colombia will obtain your Authorization prior to collecting your personal data, through any legally valid mechanism, including, but not limited to written, oral, or conduct-based consent that can be reasonably verified according to the Privacy Policy.

Your Authorization may be obtained through physical or electronic forms, the recruitment platform, email communications, or any other mechanism that allows subsequent verification and provides evidence of your consent.

3. Purposes of Processing for Recruitment in Colombia

The processing activities described in this Colombia Addendum are complementary to, and do not replace, the purposes of processing set forth in Colombia's Privacy Policy. Accordingly, personal data collected in connection with recruitment, hiring and employment-related activities may be processed for the purposes described in the Colombia Privacy Policy, to the extent applicable to the relationship between the candidate, applicant, prospective employee or employee and Plata Colombia, as well as for the specific recruitment-related purposes described below.

In addition to the purposes described in the Global Notice and in Plata Colombia's Privacy Policy, Plata Colombia processes personal data of candidates and employees for the following specific purposes:

- a. Managing the employment and hiring process with Plata Colombia, including validating and obtaining references from individuals, legal entities, and former employers;
- b. Performing identity validation and verification of personal information for purposes of onboarding as an employee, including consultation with third-party information operators for counterparty due diligence, restrictive lists, binding lists, politically exposed persons, and other internal policies related to AML/CFT, bribery, corruption prevention, and other obligations required as an entity supervised by the Superintendencia Financiera de Colombia ("SFC"), as well as consultation of public databases. This purpose may involve the processing of sensitive personal data (Datos Sensibles), including biometric data, for identity validation or authentication when required by Plata Colombia's fraud prevention or security protocols;
- c. Processing health-related information or other sensitive personal data, where strictly necessary, for the purpose of managing workplace accommodations, occupational health requirements, or social security affiliations. This purpose involves the processing of sensitive personal data (Datos Sensibles) and requires your express, prior, and informed authorization. You are not obligated to provide such data, and its provision is entirely voluntary;
- d. Transferring or transmitting your personal data, within or outside Colombian territory, to other legal entities of the Banco Plata group or third party providers, for the purpose of managing the hiring process.

4. Contact and Channels for Exercising Your Rights

To exercise your rights or submit any request, please use the channels established in Plata Colombia's Privacy Policy, available at plata.co.

5. Applicable Local Retention Rules

In addition to the retention principles described in Section XIII of the Global Notice, Plata

Colombia will retain recruitment-related personal data only for the period necessary to fulfill the purposes described in this Colombia Addendum. Where your personal data is no longer necessary for such purposes and no legal or contractual obligation requires its retention, Plata Colombia will delete, anonymize, block, or securely destroy your personal data in accordance with Colombian law and Plata Colombia's internal policies.

This includes personal data collected from individuals who expressed interest in a position, submitted an application, participated in any stage of the recruitment process, or were identified as potential candidates, regardless of whether they completed a formal application or were ultimately selected. Where an application results in employment, relevant recruitment data may be incorporated into the employee's personnel file and retained in accordance with the applicable employment and regulatory framework. Where Plata Colombia seeks to retain personal data of unsuccessful candidates for the purpose of considering them for future vacancies, Plata Colombia will request the candidate's prior and express consent for such retention.