



Privacy Policy For Human Talent

November 7th, 2024



ABRA GROUP

PRIVACY POLICY FOR HUMAN TALENT

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1. PURPOSE

This Privacy Policy ("Privacy Policy") is applicable to all personal data that is received, collected, managed, used, transmitted, stored, preserved, transferred or otherwise processed in any form, whether oral, electronic or written (collectively, "Processed" or "Processing") within the framework of your relationship as an employee, candidate or applicant for employment, officer, collaborator, retiree, or related third party (collectively, "Human Talent") of Abra Group Limited (the "Parent Company"), its nonoperational subsidiaries Abra Group Platform Services LLC and Abra Global Finance, and/or any future Parent Company affiliates or subsidiaries acquired, formed, incorporated or otherwise created hereafter November 7th, 2024 (the "Effective Date") which do not already have a separate respective governing privacy policy in place as of the date of acquisition or creation (collectively, "Abra", "our", "us", "we", or the "Companies"). This Privacy Policy does not cover or govern our operational companies with governing privacy policies already in place as of the Effective Date (the "Operational Companies"). For purposes of the Operational Companies and their personal data collection and use, their respective privacy policies shall govern and this Privacy Policy shall only be applicable and govern the personal data collection and use of Abra.

We recognize the importance of the security, privacy, and confidentiality of the personal data of our Human Talent (hereinafter, a "Data Subject" or "Data Subjects") when they carry out any activity that involves personal data transmission and other "Human Talent" activities within Abra. The purpose of this Privacy Policy is to communicate and inform how we use and maintain the security of your personal information, including what types of personal data that will be Processed, the purposes of such Processing, your rights and duties as a Data Subject, the procedures to exercise such rights, and our obligations under applicable governing law with respect to your personal data protection.

Human Talent residing in Brazil, Chile, Colombia, or the United States should additionally refer to the corresponding Annexes below, which supplement this Privacy Policy. This Privacy Policy does not apply to any Human Talent located in the UK or European Economic Area ("EEA"), or whose data is Processed by us in connection with our UK and/or EEA establishments (such persons, "UK Human Talent"). UK Human Talent should refer to our "Human Talent Privacy Notice (UK/EEA)" which shall apply and supersede this Privacy Policy.

The contact details for each of the Companies that act as "Data Controllers" under this Privacy Policy are set forth in Section 6.5 below.

2. CATEGORIES OF DATA SUBJECTS

This Privacy Policy applies to all personal data collected and Processed within the framework of your relationship as a Human Talent of Abra, including as an employee, candidate or applicant for employment, collaborator, retiree, pensioner or related third party by means of an employment contract, or the application of employment, with any of the Companies, as well as, to the personal data of your family group or beneficiary.

The definitions and descriptions of the aforementioned Data Subjects categories pertaining to the enforcement and scope of this Privacy Policy are as follows:

- **Contracted employee within the Companies (hereinafter, an "Employee" or "Collaborator"):** An Employee or Collaborator is a natural person who is contracted by the Companies to perform certain

work or services for the benefit of the Companies through any modality of contract and/or labor relationship to any of the Companies (active or suspended personnel or under unpaid leave). For the avoidance of doubt, officers of the Companies shall also be included in this definition. According to the applicable law, by signing and/or executing a contract for services or any similar employment agreement with the Companies, or by signing the consent for processing, each Employee, acting in their capacity as a Data Subject, accepts, authorizes and/or consents to the terms and conditions of this Privacy Policy herein.

- **Candidate and/or applicant to fill a position and/or vacancy within the Companies (hereinafter, a “Candidate”):** A Candidate is a natural person who declares, applies for and/or accepts by any means provided by the Companies his or her interest in seeking employment or participating in the Human Talent attraction and selection process. According to applicable law, by submitting an application, letter, or other form or request for employment, or by signing the consent for processing, each Candidate, acting in their capacity as a Data Subject, accepts, authorizes and/or consents to the terms and conditions of this Privacy Policy herein.
- **Related third party (hereinafter “Related Third Party” or “Third Party”):** A Third Party or Related Third Party is a natural person, other than a Collaborator, who has the right to benefits granted by the Companies and that renders his or her services and/or supports any of the internal obligations of the Companies and under a relationship other than a work agreement, as well as those at the service of any contractor, subcontractor, consultant and/or supplier of goods and/or services, who carries out tasks or operational, technical, administrative or commercial support duties of the Companies, including members of the Board of Directors of Abra. According to the applicable law, by accepting their right to benefits granted by the Companies, or by signing the consent form provided by the Companies, the Third Party or Related Third Party, acting in their capacity as a Data Subject, accepts, authorizes and/or consents to the terms and conditions of this Privacy Policy herein.
- **Family group, beneficiary(ies) and/or companion (hereinafter “Beneficiary” or “Beneficiaries”):** A Beneficiary is a natural person who has a legal relationship of consanguinity and/or civil union with a Collaborator contracted under any modality of labor agreement with the Company (including a spouse, children, parents, among others) as well as any natural person who is not a part of the Collaborator’s family group and/or is designated as a companion within the Companies’ human resources department’s or any third party engaged by the Companies to provide services related to human resources management (the “HR Department”) administration systems to receive organizational benefits from the Companies. By the Collaborator engaging in a contractual relationship for services with the Companies, the Collaborator recognizes to have the authorization from the Beneficiary and/or the Beneficiary, by signing the consent form provided by the Companies and acting in their capacity as a Data Subject, accepts, authorizes and/or consents to the terms and conditions of this Privacy Policy herein.
- **Retired collaborator (hereinafter “Retired Collaborator”):** A Retired Collaborator is a natural person who previously had a labor relationship with any of the Companies and was terminated or had their contract expired according to any legal grounds but still enjoys certain Human Talent benefits related to their prior employment. According to the applicable law, by accepting the certain benefits provided by the Companies or signing the consent form provided by the Companies, the Retired Collaborator, acting in their capacity as a Data Subject, accepts, authorizes and/or consents to the terms and conditions of this Privacy Policy herein.

- **Pensioner collaborator (hereinafter “Pensioner Collaborator”)**: A Pensioner Collaborator is a natural person who previously had a contractual labor relationship with any of the Companies that was ended in recognition of his or her pensional rights but still enjoys certain Human Talent benefits related to their prior employment. According to the applicable law, by accepting the certain benefits or by signing a consent form provided by the Companies, the Pensioner Collaborator, acting in their capacity as a Data Subject, accepts, authorizes and/or consents to the terms and conditions of this Privacy Policy herein.
- **Any other interested Data Subject (hereinafter “Other Interested Data Subject”)**: An Other Interested Data Subject is a natural person whose personal data was legally transmitted to the Companies and whose personal data is currently securely stored and in possession of the Companies. According to the applicable law, by previously transmitting their personal data to the Companies, of whom the Companies has personal data in its files, by signing a consent form and/or by accepting this Privacy Policy, the Other Interested Data Subject, acting in their capacity as a Data Subject, accepts, authorizes and/or consents to the terms and conditions of this Privacy Policy herein.

3. AUTHORITY

Our legal, compliance and IT teams (our “Privacy Team”) are responsible for the matters related to data privacy. The Abra Cybersecurity Coordinator will lead the Privacy Team. The Privacy Team will report to our Audit Committee (the “Audit Committee”).

This document is the responsibility of our Privacy Team and modifications to this document must be approved by the Audit Committee and the Board of Directors of Abra.

4. ACCEPTANCE OF THIS PRIVACY POLICY AND CONSENT FOR PROCESSING

In addition to the acceptance and consent of processing methods listed above in Section 2 above, by engaging in any sort of relationship with the Companies, including the below listed actions, you accept and consent to this Privacy Policy under its terms and you provide your free, express and informed consent to the Companies to partially and/or fully Process your personal data and/or the personal data of third parties, beneficiaries, other collaborators and interested parties that you have the legal authorization to grant consent on their behalf.

According to applicable law, acceptance is given especially when:

- You sign an authorization form, send and/or share your personal data and/or CV with the Companies on our application portal and/or any other that may replace or update it, or through the employment portals, social media and/or official communication channels that the Companies enable for that purpose.
- You join the Companies in a labor and professional capacity, you sign the authorization forms and/or accept the privacy clauses related to the Processing of your personal data.
- You share, send, link and/or deliver to the Companies the personal data of third parties, beneficiaries, other collaborators or interested parties that have authorized you for that purpose for the proper execution of the various Human Talent responsibilities and obligations, procedures and delivery of benefits.

- You complete and update your personal data on the HR Department's official channels and/or using forms, interactive boards, applications and/or the Companies' corporate intranet.
- You check, fill out and/or otherwise complete the verification box and/or the acceptance and consent check box of the processing and/or of the Privacy Policies of the Companies enabled in the purchase, booking and/or query flows of the applications, websites and/or mobile applications of the Companies; provided, that such systems are not yet governed by specific privacy policies or are under the policies of an Operational Company.
- You participate and/or attend to the various activities (corporate wellbeing, labor relations, sensitization campaigns, family day, health and safety in the workplace, occupational health, professional development, training, evaluation and performance) carried out by and established by the HR Department for Data Subjects under the scope of this Privacy Policy.
- You share your financial or tax information with the Companies to execute the payroll payment, compensation and accounting procedures.
- You enter and/or use one of our facilities and/or administrative, operational buildings, offices, warehouses and/or any other facility owned or controlled by the Companies where there is video surveillance and/or CCTV monitoring, with such video monitoring established for purposes of maintaining the safety of the facilities, our Human Talent and our clients.
- You use our websites, official channels, corporate tools, intranet, corporate sites and/or accept the use of cookies in your preferences. Note, that some cookies are essential to the operation of the Companies and cannot be blocked.
- You access any of our HR Department or related Human Talent services.
- You provide and/or share with the Companies through the official channels established by the HR Department documents with sensitive personal information and/or special data categories including, but not limited to: medical disability, flight capacity disability, medical contradiction and/or instructions for the use of specialized medical devices (collectively, "Sensitive Data"). Sensitive Data shared with the Companies is collected for the exclusive purpose established in applicable labor regulations and specified in this Privacy Policy. When you share such Sensitive Data with the Companies, you consent to the Processing of general and sensitive information contained in said documents. Note, that as a Data Subject, you are responsible for sharing sensitive information only through the means authorized by the Companies. The Companies are not responsible for the loss and/or sending of sensitive information of special data categories through non-official and/or non-authorized channels for that purpose.
- You share and/or send the Companies images, photographs and/or biometrical data to manage access, identification or security.
- You update the personal data related to your corporate profile and/or send personal data necessary to answer your queries and/or claims through any of the channels that the Companies have enabled for you, use the self-management forms to generate and/or request certificates of training, total or partial disability, work certificates, letters, minutes and/or general documents, work history, performance

evaluation, paid, unpaid, sick, maternity or paternity leave, leave, resignation, promotion, and/or for the solution of cases or incidents related to work or benefits delivered by the Companies.

- You sign a consent form provided by the Companies and/or complete the consent check box for the processing of your data.

In accordance with the foregoing and depending on the applicable law, we inform you that the execution of the facts and/or actions described above will be proof of the acceptance of this Privacy Policy and/or of the consent that you grant us as the Data Subject of the data for the Processing of your personal data by the Companies in the execution of the Human Talent's responsibilities and obligations.

5. MODIFICATIONS TO THIS PRIVACY POLICY

We reserve the right to make changes and/or updates at any time to this Privacy Policy in our sole discretion, including, but not limited to, responses to new legislation, internal policies or new requirements to provide or offer the services or products.

These changes are available to the public on our website at <https://abragroup.net/privacy-policy/>. Abra Employees will also be notified via internal e-mail in the event any changes to this Privacy Policy are made that significantly affect Abra Employees' rights or remedies under applicable law.

6. CONTENT

6.1 WHAT CONSTITUTES PERSONAL DATA?

We define personal data as all personal information that identify, relate to or may be associated with one or more identified or identifiable natural persons, such as: your name, surname, contact information, location data, electronic signatures, and birthdate, among other similar identifying information.

6.2 WHAT TYPE OF PERSONAL DATA DO WE PROCESS?

Pursuant to the purposes described in this Privacy Policy, we hereby inform that we may collect the following categories of personal data:

- **General Identification Information:** name, surname, gender, nationality, type and number of identification or ID, electronic signature, personal contact information, marital or civil status, kinship, Passenger Name Record, and emergency contacts.
- **Location Information:** telephone number (landline and mobile), mailing addresses, e-mail address, fax number.
- **Socioeconomic Content Information:** bank information, cardholder's personal data, payment information, credit card information, name or bank code, savings account number, contractual information (date of entry, type of contract, position profile, work journey, workers compensation fund, pension fund, family compensation fund, health fund, EPS and/or prepaid medicine entity). Information will be collected for benefit ticket refund processes including transaction date, transaction authorization code, credit card numbers and country and name of the financial entity that issued the credit card.

- **Sensitive Data:** Sensitive Data, including personal data that reveals the racial or ethnic origin, biometrical data, health data, medical evaluations, temperature measurements, medical certificates and/or authorizations, biometric data, union affiliation, preventive and/or work medicine information, work assessment. The Companies limit the collection of Sensitive Data to scenarios in which it is strictly necessary to collect and/or Process such Sensitive Data, when the Data Subject has given their explicit or express consent and when it is necessary to comply with the exercise of specific rights and/or to protect the Data Subject's vital interests.

We hereby inform you that you are under no obligation in any event to authorize the Processing of Sensitive Data.

- **Other Types of Information:** IP address, travel history, special needs, claim, query and/or complaint history, employing company and/or position or profession, academic and/or professional profile, and other information necessary to perform the contractual relationship.
- **Information we Receive from Third Parties:** employment agencies, self-registration machines, surveys or other market research methods.

6.3 PURPOSES OF PROCESSING: HOW DO WE USE YOUR PERSONAL DATA?

The Companies Process your personal data primarily for the following purposes:

- Manage the proper execution of the responsibilities and obligations related to Human Talent activities, HR Department's responsibilities, and the general functions and benefits within the Companies.
- Promote and manage the collection, invitation, contact, verification, agenda, interview, and candidate and/or prospect evaluation activities and procedures in the preselection and selection process for employment vacancies by the Companies.
- Validate the personal data shared by Human Talent to effectuate the internal responsibilities and obligations of verification of personal and/or employment references, disciplinary and/or judicial background, security studies (where applicable), validation of the vaccination status (where required), restrictive lists, prevention of money laundering, corruption or terrorist financing and politically exposed persons, in accordance with the provisions of the Code of Ethics of the Companies. Further, when you have consented and according to the functions of your position, the Companies may also check your credit history according to the provisions of current and applicable labor regulations in each of the countries in which the Companies carry out the selection process and hiring of Human Talent.
- Schedule aptitude, knowledge, psychological, psychotechnics, psychosocial factor, security studies and occupational medical tests. Scheduling of our tests will vary depending on the role and functions of the position.
- Manage control, follow-up and monitoring of contracting, formalization and feedback of the candidates, prospects, and selectees according to the role and/or position established by the Companies.

- Manage the support and monitoring of labor history, collective benefits and labor obligations derived from the contractual or labor modality, including but not limited to: (a) the delivery of the elements for the fulfillment of the work and elements of personal protection, (b) the payment of payroll and sending of the receipt or proof of payment, (c) the acknowledgment of licenses, disabilities, permits and vacations, (d) the generation of labor and tax certificates, disability training, resignation, among others (e) the affiliation and payment of contributions to the comprehensive social security and professional risks system, (f) the affiliation to the family compensation fund in the countries where it applies, (g) the management of on-duty or work trips, (h) the disciplinary process, (i) registration of hours, days and overtime, (j) the delivery of aid, and those established in the benefits and/or compensation plan of the Companies and that do not constitute salary, (k) the scheduling of shifts, vacancies and/or schedules, (l) the training and awareness pursuant to the Companies' training policies, and the (m) monitoring and control of the employee's work history in order to allow the proper execution of the different responsibilities, obligations, procedures and delivery of Human Talent benefits by the Companies.
- Manage the registration and renewal of the personal data of the Collaborator, beneficiaries and/or the Beneficiary of the Collaborator in internal systems designed to book, reserve and purchase air tickets, in order to Process the request, change, reprogramming and confirmation of bookings, quotes and travel pre-reservations; provided, that such systems are not yet governed by specific privacy policies or are under the policies of an Operational Company.
- Manage the administration and delivery of policies, manuals, instructions, information capsules, infographics and/or any other type of information directly and/or indirectly related to the performance of the work or position and through the corporate and official channels of the Companies
- Manage the registration and attendance to internal and/or external training courses provided by the Companies to its collaborators, as well as attending corporate wellbeing, health in the workplace and/or collective visit activities to internal facilities and/or third-party facilities that provide training.
- Implementation of diversity initiatives to maintain an inclusive workplace, strategically plan future recruitment and promotions, and foster equal pay and preventing discrimination.
- Carrying out internal and/or external regulatory audits related to the commercial activity performed by the Companies.
- Consult and/or provide personal data to banking entities, credit and debit card payment companies, credit report agencies, insurance companies and/or fraud control, payroll, charges and/or refund service providers in the development of the contractual relationship and generating accounting reports for the Companies.
- Consult and update information and personal data of Collaborators, Related Third Parties, Beneficiaries, Retired Collaborators and/or Pensioner Collaborators at any time, to maintain the veracity of the information to allow the Companies to adequately comply with the HR Department management policies and obligations, as well as the general Companies Human Talent responsibilities and obligations.

- Contract storage and/or data Processing with third parties for the proper performance of Human Talent responsibilities and obligations, procedures and benefits under the standards of security, confidentiality and retention of internal documents in compliance with the regulations that bind the Companies.
- Manage the relationship between the Companies and the Data Subjects, as well as the provision and offer of the benefits arising from their status as Collaborators, Related Third Parties, Beneficiaries, Retired Collaborators and/or Pensioner Collaborators.
- Fulfill the obligations arising from the relationship with the Companies, including the payment of salary, social benefits, among others.
- Manage and administer legal responsibilities and obligations by virtue of an official or regulatory requirement by control and surveillance authorities, internal authorities in defense of security, the rights and/or property of the Data Subjects and the Companies, its digital channels and/or its facilities.
- Manage and handle the complaints, queries, claims, requests and/or suggestions you make before the Companies with respect to the use and/or Processing of your personal data through the channel set forth for that purpose sent to compliance@abragroup.net and as further detailed below.
- Manage the assignment of personal data in the event of a change of control of one or more Companies, including a merger, acquisition, sale of assets, reorganization, or other similar transfer of more than 50% ownership interests in Abra to a third party (collectively, a “Change of Control”). If as a result of a Change of Control there is a change to the Data Controller, we will inform you of the situation so you may exercise your rights pursuant to applicable law. The conditions under which the Data Subjects may exercise their rights will be indicated when informed of the Change of Control.
- Manage and administer Sensitive Data when requested by the competent authorities under medical and health emergency and/or when the situation requires it in order to protect the health of employees and prevent, treat, control and mitigate epidemics, the spread of diseases, monitor health situations, infections and/or unforeseen circumstances or force majeure, as well as, design by the Companies of contingency, promotion, prevention and mitigation plans in order to safeguard the vital interests of collaborators.
- Implement and manage the information security measures and technical controls that are adequate for the protection of the personal data collected by the Companies, such as: (a) assignment of roles and responsibilities for the Processing of personal data, (b) confidentiality agreements, (c) management and delivery of usernames and corporate email, (d) security measures for remote access and/or authentication to the corporate system, and (e) security audits of personal data.
- Query, update and Process your personal data, for the execution of operational, analytical, statistical and evaluation activities, according to your level of interaction and satisfaction with the quality of the services offered by the HR Department.
- Contact current and potential employees to present and/or offer new employment opportunities.

- Share information within and among the Companies.
- Complying with other legal obligations according to the applicable local law.
- Other legitimate business interests, unless those interests are overridden by your rights or freedoms.

Finally, note we do not sell, trade or negotiate with your personal data.

6.4 WHAT IS OUR LEGAL BASIS FOR PROCESSING YOUR PERSONAL DATA?

We may rely on the following lawful bases when Processing your personal data:

- **Consent:** In certain circumstances, we may ask for your consent (separately from any contract between us) before we collect, use, or disclose your personal data, in which case you can voluntarily choose to give or deny your consent without any negative consequences to you;
- **Legitimate Interests:** We may use or disclose your personal data for the legitimate interests of either Abra or a third party, but only when we are confident that your privacy rights will remain appropriately protected. Where we require your data to pursue our legitimate interests or the legitimate interests of a third party, it will be in a way which is reasonable for you to expect as part of the running of our business and which does not materially affect your rights and freedoms; or
- **Legal Obligation:** There are instances where we must Process and retain your personal data to comply with laws or to fulfil certain contractual or legal obligations.

The following table provides more details on some of our purposes for Processing your personal data and the related legal bases. The legal basis under which your personal data is Processed will depend on the applicable law and the data concerned and the specific context in which we use it.

Type of Personal Data	Purpose of Processing	Legal/Business Basis for Processing
Government ID, Financial Information	Supporting payroll and tax reporting activities.	The Companies' compliance with contractual and legal obligations arising out of the Human Talent-employer relationship.
Nationality, Citizenship	Complying with immigration and other work permit requirements and for internal documentation purposes.	Compliance with applicable law.

Professional Data	Staffing, organizational design and business continuity purposes.	Your consent, where required under applicable law, the Companies' legitimate business interests, or compliance with applicable law.
Device Data, Website Usage Data, Account Data and Marketing Data	Manage our use of tracking technologies such as cookies and analyze collected data to learn and improve our business. Occasionally monitor and review the use of Abra equipment, accounts, information technology systems and networks. Companies may access and review electronic files, messages, and emails sent or stored on its information technology systems, including accounts, computers and devices provided to Employees.	Your consent, where required under applicable law, the Companies' legitimate business interests, regular exercise of rights in judicial, administrative and arbitration proceedings, protection of third-party integrity, or compliance with applicable law.

6.5 WHO IS RESPONSIBLE FOR SECURITY?

All personal data processed in relation to this Privacy Policy is the responsibility of the data controller ("Data Controller").

Our Data Controller's information is as follows:

1 Ashley Road, 3rd Floor
Altrincham, Cheshire, UK WA14 2DT
E-mail: compliance@abragroup.net

6.6 PROTECTION, SECURITY AND CONFIDENTIALITY OF PERSONAL INFORMATION

Protection, security and confidentiality of information and personal data of Data Subjects is of vital importance to the Companies. We apply appropriate technical, physical and administrative safeguards and access restrictions to secure your information in accordance with this Privacy Policy in order to prevent the unauthorized access, unauthorized use, unlawful Processing, unauthorized or accidental loss, and destruction or damage to that information.

We maintain appropriate information security policies, procedures and standards, which may change at any time at our sole discretion, and which the sole purpose of protecting and preserving the integrity, confidentiality and availability of personal information, regardless of the media and/or format in which it is stored or located, temporarily or permanently, as well how they are transmitted.

In this sense, we rely on a number of technological security tools and implement industry-recognized security practices, including but not limited to: information transmission and storage through secure mechanisms, such as use of secure protocols, securing technological components, encryption, restricting access to information only to authorized personnel, backup of information, secure software development practices, firewalls, antivirus, and IPS, among technological security tools.

Third parties engaged by the Companies (contractors, external consultants, temporary collaborators, etc.) involved with the Processing of the personal information of Data Subjects are also under the obligation to keep and maintain security protocols and are subject to data protection laws and regulations.

6.7 RETENTION POLICY

We will keep your personal data for as long as is necessary for the fulfillment of the purposes established in this Privacy Policy and as required or permitted by applicable law and regulations. Your personal data may remain stored in the Companies files for a minimum of (a) one year (1) for information regarding candidates and/or applicants to fill a position and/or vacancy within the Companies and any test results, in order to be taken into account for possible future employment, (b) two (2) years, as a preventive period counted from the date of the last Processing or from the moment of contractual employment separation in compliance with legal and/or contractual obligations of the Companies. Such data retention periods may extend in order to fulfill the Companies' legal and/or contractual obligations regarding aeronautical, accounting, tax, administrative and/or other applicable matters, as well as for the time necessary to fulfill all applicable provisions regarding the handling of complaints, claims and/or queries and that require the Companies to carry out certain data Processing in compliance with the procedures and requirements of regulatory and control authorities and entities of any jurisdiction in which we operate.

6.8 TRUTHFULNESS OF THE INFORMATION

It is your duty as a Data Subject, and the duty of the third parties that you may have authorized to act on your behalf, to provide the Companies with your updated, truthful, complete, exact and correct personal data the quality of the information you provide determines how we properly execute the various HR Department responsibilities, obligations and procedures as well as the various Human Talent benefits afforded by the Companies. The Companies shall presume the truthfulness of the information provided and shall assume no obligation of verifying the identity, authenticity, validity, sufficiency, and authenticity of the information and/or documents provided by each of the Data Subjects. Therefore, the Companies shall assume no liability nor any responsibility for damages of any nature that may originate or otherwise result from the lack of truthfulness, sufficiency or authenticity of the personal data you share with us, including damages derived from homonymy and/or identity theft. All the above notwithstanding any administrative/disciplinary sanctions and the legal consequences derived from the existence of a work relationship that the Companies may implement pursuant to labor legislation and internal policies.

6.9 DO WE COLLECT INFORMATION ON MINORS?

We recognize the special level of protection that personal information of children and adolescents according to each applicable law (hereinafter, "Minors") are afforded. We do not knowingly solicit or collect personal information from Minors without parental consent. Please note that for the purposes of establishing the legal and commercial relationship with Suppliers within the framework of the fulfillment of the obligations derived from the purchase and/or contracting of goods and services by the Companies, we will not use or Process any Minors personal data and information received. If we learn that we have collected any Minors

personal data and information, we will promptly delete such information. If you believe that any Minors personal data and information has been collected without your permission, please request the deletion of such Minors data by contacting us.

6.10 USE OF COOKIES

The Companies and external service providers may use cookies and other similar technologies on websites, mobile applications, and electronic devices used to access the Company sites for the purposes listed above and to learn about the origin, increase functionality and accessibility of websites, verify that users meet the required criteria to process their requests and adapt their products and services to the needs of users, by obtaining the following general information:

- The type of browser and operating system used.
- IP Address.
- Language of the device.

These cookies and other similar technologies may be disabled and eliminated by the Data Subject when he or she desires. For that purpose, you, the Data Subject, or Other Interested Data Subject may consult and/or request help from the Internet browser they are using.

6.11 WHO DO WE SHARE YOUR PERSONAL DATA WITH?

We may share your personal information among the Companies and with the third parties listed below for the following purposes: (a) establish a legal and commercial relationship with subcontractors, licensing companies, financial entities, insurers or other third parties within the framework of the fulfillment of our business obligations; (b) execute contractual relationships as necessary; (c) perform legitimate business interests, in accordance with the consent and/or authorization given to us; and (d) fulfill the legal obligations in accordance with the applicable governing law.

Therefore, your personal information may be shared with the following categories of third parties and/or recipients:

- Suppliers and/or subcontractors of licensing companies, IT equipment maintenance, IT tools, communication channels support, IT hardware, cloud storage and technology infrastructure.
- Financial entities, payment gateways, credit bureaus, anti-fraud controls and payment processing.
- Insurers, representatives and commercial agents, operators or loyalty program administrators.
- Transportation providers, such as airlines, taxi services, car rentals, and/or ride-sharing apps, for purposes of transportation in the course of your employment with the Companies as a Human Talent.
- Third parties who perform commercial and institutional, social responsibility, legal, training events and other corporate benefits on behalf of the Company.
- Third parties in connection with a legal obligation, government order or other form of legal proceeding.
- Where the execution of your work, services, tasks, or other responsibilities of your employment position as a Human Talent of the Companies requires such personal data to be shared.

- Government bodies to comply with the legal obligations, such as customs, migration and/or airport obligations, governmental, environmental, legal, forces and security entities, police and regulatory and control bodies, when applicable law so require or due to a procedure, requirement, request or similar action from any authority.
- A successor entity to Abra following a change of control, including a merger, acquisition, sale of assets, reorganization, or other similar transfer of more than 50% ownership interests in Abra to such third party.

Given that the Parent Company and our Data Controller is located outside of the European Union, it is therefore possible that in some cases, recipients of your personal information and personal data are located outside of the country where your personal information was originally collected, with such information being shared for the purpose of complying and the proper performance of the various Human Talent responsibilities, obligations, procedures, and benefits, or for legally established reasons and/or under coverage of applicable law.

7. RIGHTS OF THE DATA SUBJECT

You may have certain rights regarding the use of your personal information, subject to applicable local laws:

- **Access:** You may have the right to ask for a copy of the personal information that we hold about you.
- **Update or Correction:** You may notify us of changes to your personal information if it is inaccurate or it needs to be updated.
- **Deletion:** If you think that we should not be holding or Processing your personal information anymore, you may request that we delete it. Please note that this may not always be possible due to legal obligations.
- **Restrictions on use:** You may request that we limit the Processing of your personal information in certain circumstances. Requirements by law to Process your personal information override your own rights.
- **Object:** You have the right to object to Processing, including for direct marketing and where Processing is based on legitimate interests.
- **Portability:** If you wish to transfer certain personal information to another organization (and certain conditions are satisfied), you may request that we provide you with a copy.
- **Withdrawal of consent:** If we are Processing personal information subject to your consent, you may withdraw consent at any time.

For queries in excess of once per calendar month, the Companies may charge the Data Subject making said request for shipment and reproduction expenses, if applicable.

7.1 ACCREDITATION OF OWNERSHIP

In order to process your requests, questions and/or claims, or for you to exercise any of the rights specified in this Privacy Policy, you must accredit your identity and ownership of the requisite personal information

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and provide, in all cases, the pertinent information that allows us to accredit the Data Subject's identity and for it to be valid under applicable law. Therefore, we may request documents and/or information that allow us to validate your ownership, properly address questions and complaints, avoid loss, confirm whether certain persons are empowered to act on your behalf, and address alleged incidents of unauthorized or fraudulent access to the personal information for which we are responsible for.

When the petition is made by someone other than the Data Subject, the third party must duly accredit power of attorney to act on behalf of the Data Subject by sending the supporting documents.

The request to exercise the rights as a Data Subject must be submitted in writing and/or digitally through a channel enabled by the Companies for that purpose, which you may find in Section 7.3 below.

Any request must include, at minimum, the following:

- The Data Subject's information and/or of their representative or person exercising the right on their behalf.
- Copy of the identification document or equivalent document accrediting the identity of the Data Subject and considered valid under the law. If acting through a legal representative, the identification document or equivalent document accrediting the identity of the representative must be submitted.
- Concrete description of the request and justification of the invoked right.
- Physical and/or electronic address to send the response and notifications.
- Documents supporting the request (if applicable).

Your request will only be processed if the identity and ownership of the requesting party can be accredited and the above-mentioned requirements are met.

7.2 CLAIMS

The Data Subject and/or their authorized representative may submit claims before the Data Controller when they consider their personal information is subject to correction, rectification, update, suppression and/or they have knowledge of an alleged breach of the personal information Processing obligations set forth in applicable law. The right to claim must not adversely affect the rights and liberties of other Data Subjects. Therefore, this right can only be exercised using the channel enabled by the Companies.

In any case, the Data Subject is entitled to make claims before the corresponding local authority for personal data protection, following the procedural requirements provided by applicable local laws. Please note that certain governing jurisdictions require that your first contact the Data Controller before submitting any local authority claims.

It is possible that the Companies may not respond to your full request or total or partial access to the information, in the following cases:

- The requesting party is not the Data Subject, or the legal representative accredited for that purpose.
- The information and the personal information of the requesting party is not in the Companies' data base.

- There is a legal impediment or resolution from an authority to deny such requests.
- Rectification, cancellation or opposition has been previously made and the request lacks substance as a result.

7.3 TERMS OF RESPONSE

The following general terms will be used as reference for the Processing of your requests, inquiries and/or claims. However, you must consider that, depending on the region, the terms of response may vary according to local and current applicable law. Notwithstanding the enforcement of the general procedures set forth in this Privacy Policy and depending on the country in which your personal data is collected, we have identified certain territories in which we Process personal data and where local laws include specific stipulations regarding the terms of response. You must therefore read this section jointly with the established Annexes listed below according to the pertinent and applicable territory and/or region.

- Brazil Annex.
- Colombia Annex.
- Chile Annex.
- United States Annex.

These annexes are an integral part of this general Privacy Policy.

For Queries: Informational queries will be answered within ten (10) business days of receipt of your query. When it is not possible to respond within said term due to a legitimate reason, the Companies will inform you of the legitimate justification for the delay and establish the reasonable date when your question will be answered.

For Claims: Claims will be answered within fifteen (15) business days of receipt of your claim. All submitted claims must be duly supported. When it is not possible to respond to your claim within 15 business days due to legitimate reasons, we will inform of the legitimate justification for the delay and establish the reasonable date when your claim will be answered.

If the submitted claim is incomplete, the Data Subject will be required within five (5) days following receipt of the claim to correct any errors. If the interested party does not provide the required information within two (2) months as of the date of the request for correction, the submitted claim will be deemed to have been withdrawn.

Finally, due to legal exceptions, requests for final suppression of personal data from databases and/or revocation of the authorization of personal data shall not proceed when a Data Subject has a legal, labor and/or contractual duty that requires the processing of personal data and permanence of the information on the Companies' database, as per the terms provided by current and applicable labor laws and pursuant to the terms set forth in this Privacy Policy.

7.4 HOW CAN YOU EXERCISE YOUR RIGHTS? GENERAL PROCEDURE FOR THE EXERCISE OF THE RIGHTS OF DATA SUBJECTS

This Privacy Policy defines the general procedure to exercise your rights, notwithstanding the enforcement of specific stipulations and procedures and/or those of local laws in the territory where you are located and/or where we collect your information.

For that purpose, this document defines the general procedure to exercise your rights, notwithstanding the enforcement of specific stipulations and procedures and/or those of local laws in the territory where you are located and/or where we collect your information. In this scenario, we ask you to consult the ANNEXES of this Policy for the country where we collect your personal data.

In order to exercise your rights or submit any claims or complaints, the Companies have established the following e-mail address as the official channel of communication: compliance@abragroup.net. The designated area for handling complaints and claims will be the Privacy Team.

8. MODIFICATIONS TO THIS PRIVACY POLICY

We reserve the right to make changes and/or updates at any time to this Privacy Policy in our sole discretion, including, but not limited to, responses to new legislation, internal policies or new requirements to provide or offer the services or products.

These changes are available to the public on our website at <https://abragroup.net/privacy-policy/>.

9. VALIDITY OF THIS DOCUMENT

This Privacy Policy shall enter into force on the day of its publication, replacing any previous published version. The Companies may amend, modify or withdraw any part of its content at any time, by publishing the updated text on this site and/or by sending it to the Data Subject through any other mechanism of acceptance in the event of substantial modifications.

Version	Approval Date	Publication Date
1.	November 7 th , 2024	December 2 nd , 2024

ANNEXES

a) **BRAZIL**

For personal data and data Processed in Brazil, the procedures to exercise the rights of Data Subjects are contained in Law 13.709 from 2018 or any law that updates, extends and/or replaces it. By accepting this Privacy Policy and consenting to its terms therein, you grant us authorization to transmit and/or transfer your information and personal data to third countries where we operate, which may have levels of data protection that differ from those required in Brazil. If any changes or updates result in changing the purposes for Processing your personal data, we will contact you to obtain your consent, if the legal basis of such Processing is the consent of the Data Subject. You can refuse by not agreeing or consenting with one or more Processing of personal data or revoke your consent by requesting us to stop the Processing of personal data. But if you refuse or revoke your consent, we may not be able to fulfill the purpose informed to you.

Brazilian law guarantees you certain rights related to the Processing of your personal data, including the right to know what personal data has been collected, the right to access such personal data, the right to rectify any errors of such personal data, the right to update such personal data, and the right to suppress certain personal data. The Data Controller of the database must comply with the requests of the Data Subject, at no cost, within the term established by law.

We may transfer your personal data to third countries and foreign organizations. We will adequate and proportionate security measures, including following international transfer for locations covered by adequacy decisions issued by the National Authority of Personal Data Protection (Autoridade Nacional de Proteção de Dados – “ANPD”). Locations where an adequacy decision has not been issued by ANPD, we implement the standard contractual clauses published by the ANPD in the data transfer agreements.

In the event of a substantial change to the purpose of Processing Employees’ personal data, where consent is required for Processing your personal data, we will notify Abra Employees by email requesting your renewed consent for such certain Processing. For purposes of this Annex, “substantial change” shall refer to any modifications that (i) could serve as a basis for imposing disciplinary measures on an Employee and/or (ii) impact the purposes for which personal data is Processed.

You may exercise your rights by sending an e-mail to our Data Protection Officer at compliance@abragroup.net. You may also exercise your rights before the corresponding governing local authority ANPD.

b) **CHILE**

For personal data and data Processed in Chile, the procedures to exercise the rights of Data Subjects are contained in Law N. 19.628 (“LPD”) and Law No. 20.575 or any law that updates, extends and/or replaces it. By accepting this Privacy Policy, and consenting to its terms therein, you grant us authorization to transmit and/or transfer your information and personal data to third countries where we operate, which can have levels of data protection that differ from those required in Chile.

Chilean law guarantees the rights of access, elimination or cancellation, modification and blockage with respect to your personal data.

You may exercise your rights by sending an e-mail to the Privacy Team at compliance@abragroup.net. The Data Controller will respond to all appropriate requests within the applicable timeframe required by law. You may also exercise your rights before the corresponding governing local authority.

c) **COLOMBIA**

The applicable law in Colombia regarding personal data is Law 1581 of 2012, along with its decrees and any norms that develop and/or modify it.

By consenting to the processing of your data, you acknowledge that we may transmit and/or transfer your information and personal data to third countries where the Companies operate. These countries may have different levels of data protection compared to those required in Colombia; however, the Companies will strive to ensure that such applicable law meet the minimum necessary standards in accordance with Colombian regulations.

Data subject's rights

For personal data and data Processed in Colombia, the procedures to exercise the rights of Data Subjects are contained in Law 1581 from 2012.

Colombian law guarantees the rights to access, know, update and rectify your personal data with data processors or Data Controllers, as well as to request proof of authorization granted to the Data Controller, to be informed by the Data Controller, upon request, about how their personal data has been used, to file complaints with the Superintendency of Industry and Commerce for violations of the provisions of applicable law and/or revoking the authorization or suppressing the information within the term set forth by law.

The Data Subject may only elevate the claim before governing local authority once it has exhausted the claim process before the Data Controller, as a procedural requirement. The Superintendency of Industry and Commerce is the governing authority in matters of personal data protection.

Terms for Addressing Queries and Claims

The data subject may submit queries and claims in accordance with the provisions outlined in section 7.1. and 7.2. The terms of response according to Colombian legislation are as it follows:

For Queries: Informational queries will be answered within ten (10) business days of receipt of your query. When it is not possible to respond within said term due to a legitimate reason, the Companies will inform you of the legitimate justification for the delay and establish the reasonable date when your question will be answered, which in no case shall exceed an additional five (5) business days after expiration of the first term.

For Claims: Claims will be answered within fifteen (15) business days of receipt of your claim. All submitted claims must be duly supported. When it is not possible to respond to your claim within 15 business days due to legitimate reasons, we will inform of the legitimate justification for the delay and establish the reasonable date when your claim will be answered, which in no case shall exceed an additional eight (8) business days after expiration of the first term.

If the submitted claim is incomplete, the Data Subject will be required within five (5) days following receipt of the claim to correct any errors. If the interested party does not provide the required information within two (2) months as of the date of the request for correction, the submitted claim will be deemed to have been withdrawn.

Finally, due to legal exceptions, requests for final suppression of personal data from databases and/or revocation of the authorization of personal data shall not proceed when a Data Subject has a legal, labor and/or contractual duty that requires the processing of personal data and permanence of the information on the Companies' database, as per the terms provided by current and applicable labor laws and pursuant to the terms set forth in this Privacy Policy.

You may exercise your rights by sending an e-mail to the Privacy Team at the email: compliance@abragroup.net.

d) UNITED STATES

For personal data and information Processed in the United States, if applicable, and in relation to the Processing of personal data collected in the territory and for residents of the state of California, your rights in relation to personal data will be assessed pursuant to the requirements of the California Consumer Privacy Act, Cal. Civ. Code §§ 1798.100 et seq. (the "CCPA").

The Department of Transportation of the United States of America (the "DOT") establishes that the Companies shall sufficiently inform Data Subjects of the collection, use, Processing and disclosure of personal data and data of travelers, clients or users.

Although there is no federal statute specifically regulating the processing of personal data and data in this country, the DOT may investigate and prevent any practice related to the sale of air transportation services, which also includes Processing personal data and data of our travelers, clients and users.

The Companies undertake to comply with the U.S. Children's Online Privacy Protection Rule (the "COPPA") that regulates the protection of privacy of minors in the United States, empowering the DOT to investigate any use of personal data and data of children under the age of thirteen (13) on the Internet. You may exercise your rights by sending a request to compliance@abragroup.net.