

PRIVACY NOTICE

LAST REVISION: July 12, 2022

This Privacy Notice (“Notice”) of Grupo Financiero Davivienda, that comprises the following entities: Corporación Davivienda (Costa Rica) S.A., Banco Davivienda (Costa Rica) S.A.; Davivienda Puesto de Balsa (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 referred to as “DAVIVIENDA”), applies to all the information that DAVIVIENDA collects by means of its website www.davivienda.cr (the “Site”), and the mobile applications (the “Applications”) where this Notice is published. It also applies to information that DAVIVIENDA collects from connections outside Internet.

This Notice does not apply to information collected by any third party other than the Group, even by means of any application or content (including advertising) that may be linked or accessed from or on the Site.

The object of this Notice is to inform you about the information we collect, how such information will be processed, when and how it may be shared or transferred, its rights related to the collection and processing of such information, its right to access and update such information, and the security measures that we use to protect it.

For the purposes of this Notice, the User will be any individual who uses the services on the Sites or Applications, whether it is a DAVIVIENDA client or an individual who needs information, quotes, services, or who participates in promotions, raffles, or initiatives that are open to the general public.

1. What information do we collect?

DAVIVIENDA limits the collection of information to the one that is relevant for the services that it markets in Costa Rica. The collection may be made directly or by means of third parties acting on our behalf. The collection of personal information is always done legally in accordance with the laws of the Republic of Costa Rica, especially Law 8968 for the Protection of Individuals regarding Personal Information Processing and its Regulations.

1.1. Information directly provided by the User

It is possible that the User directly shares information such as its full name, date of birth, identification document, civil status, domicile, telephone number, email, bank information (including credit and debit card numbers or bank account numbers). This information may be provided to purchase or quote a service, to keep an existing business relationship, or to receive business information or participate in business initiatives such as raffles. On some occasions, depending on the procedure to be performed, the requested service may not be provided if the User does not share its information.

If for any reason the User provides third party information, it will always do so at its sole responsibility and with the consent of such third party with respect to its personal information. The processing of such third party information by DAVIVIENDA will be performed in good faith under this understanding.

1.2. Information about devices

DAVIVIENDA may automatically collect specific information, such as IP addresses, web browser type, internet service provider, reference and exit pages, operating system of the device, Site activity (including content visualized therein), flow data from clicks or other types of metadata to analyze trends, manage Sites, improve operation and content, and customize User experience. Data collection may be carried out by means of business technologies such as cookies or beacons, as explained in the cookies section.

It is possible to have access to specific information about the User location such as GPS coordinates of a mobile device, cell tower identification, and/or wireless connections to customize the experience of use of the Sites or other DAVIVIENDA products and services.

If the User does not want DAVIVIENDA to collect and use specific information about its geographic location, in some cases it may deactivate location tracking features in its device. The User may check the manufacturer configuration of its device to verify how to do it.

1.3. Third Party Sources of Information

DAVIVIENDA may receive additional information about the User by checking commercially available open or public sources, or third party sources. If the User uses services offered by third parties such as Facebook, Google, or Twitter by means of the Sites or Applications to access the Site or Applications or to share information

about its experience on the Sites or Applications with others, it is possible to collect information from such services offered by third parties.

2. Intended Use of User Information

DAVIVIENDA uses the information collected from its Users for several purposes including:

2.1. Mandatory purposes

Information collected by **DAVIVIENDA** will be used to show our Site, Applications, and content to you; and for the purposes of financial, bank, credit, business, and insurance contracts and contracts of any other kind that have been signed in accordance with the Commerce Code, the Laws of the Republic, and other regulations that govern the National Financial System to ensure an acceptable risk level without limiting the full exercise of the right to self-determination of personal data. Among such purposes are the following:

- To develop processes required for the proper provision of the contracted products and/or services.
- To assess, keep, improve, and strengthen the contractual relationship including the offer of new products and/or services related with the contracted products and/or services.
- To update provided data with information that is available in credit bureaus, credit information agencies, or any other person, entity or organization that handles or manages databases with the legally defined objects for such types of entities.
- To develop and implement tools to prevent frauds.
- To order data processing of financial information which includes the use and update of contact information with entities specializing in collection duties to be able to process the collection of contracted obligations and other needed or supplementary services. Additionally, to handle non-performing loan portfolios using the legal mechanisms and out-of-court means allowed by the legal system.
- To assess the solvency of the debtor, its payment behavior, collection of corresponding preliminary and judicial fees, rates, and charges, if applicable.

2.2. Non-mandatory purposes

Information may be collected to learn about the business profile of the client, to develop advertising, marketing, and business campaigns related to products and services of **DAVIVIENDA** and its business associates that may supplement or enrich the offer of such products and services that will be promptly made known to clients and users. Among such purposes are: (i) to perform statistical or behavior studies about tastes and preferences regarding the contracted products and/or services; (ii) to make commercial research to identify the needs and tastes to be satisfied by the products and services to be offered; and (iii) to provide information on events, innovations, promotions, advertising, and loyalty programs by email, postal mail, landline phone, mobile phone, fax, SMS, MSM, social media, or similar means; (iv) to measure the level of satisfaction of the contracted products and/or services; (v) to inquire and share with third party providers information related to the credit behavior or compliance or noncompliance of obligations derived from the contractual or business relations related to products or services sold by **DAVIVIENDA**; (vi) to share information with entities of Grupo Financiero Davivienda (Costa Rica) S.A., its parent company or affiliates.

The information will be kept as long as needed to provide the contracted service; to have a backup of requested information; to fulfill legal, regulatory, administrative, bank, or compliance obligations; and to solve controversies or disputes.

3. With whom may the information be shared?

3.1. Companies that are part of the Group

The information described in section 1 above may be shared with or entrusted to companies that belong to Grupo Financiero Davivienda in Costa Rica and with the companies that control (its parent company and related companies), are controlled by, or have shared control with such companies, as well as with selected third parties.

3.2. Service providers

DAVIVIENDA may share the information described in section 1 above with service providers that perform activities related to DAVIVIENDA products and services. Some examples of these activities include providing customer service, installation of services or technical visits, package or document delivery, administrative duties, email replies, payment processing, collection services, business intelligence or market research, service or product marketing through different channels, management, storage, and data processing services of its clients, among others.

3.3. Compliance

User information may also be shared because of an obligation established by law, to comply a judicial or administrative order, legal procedure or similar legal process including its disclosure to external auditors or legal advisors or when in good faith we believe that such disclosure of information is needed to protect our rights, protect the security of the User or the security of others, to investigate or prevent frauds, or to respond a government request.

Information may also be shared with local or international entities to comply legal obligations or as an express requirement of a national or international authority; h) with United States entities in compliance of federal laws including without limitation: i) The Patriot Act; ii) AMLA – Anti-Money Laundering Act; iii) and/or laws that modify, add, supplement, or substitute such laws and its implementation rules and regulations; iv) and/or any new related laws (“United States AML Laws”) regarding illegal activities or activities related to money laundering, financing of terrorism, and/or other related crimes. This authorization includes any other local and/or international laws of any other country regarding illegal activities and/or activities related to money laundering, financing of terrorism, and/or related crimes according to which those RESPONSIBLE must share information.

3.4. Business operations

DAVIVIENDA may share the User information indicated in section 1 above if DAVIVIENDA is part of a merger, takeover, transformation, acquisition, or sale, in the event of a transfer of shares or in the improbable event of an insolvency procedure.

3.5. With Third Parties

DAVIVIENDA may share User information with third parties for any other reason that has been informed to the User when collecting its information or in accordance with the User consent including, but not limited to: a) credit protectors or bureaus to inform third parties on the payment behavior of obligations derived from financial products or services (including positive and/or negative references); b) the Credit Information Center (CIC) of the SUGEF, in compliance of regulatory obligations; c) credit card international operators, or business partners or third parties with whom loyalty programs and/or promotions are managed; d) national or international bank or financial entities in the event that bank or financial services are requested or required with such entities; e) in the event of a merger, takeover, or similar operations, to the entity that receives the information because of such an operation; f) to public local or international entities in compliance of legal obligations or by express requirement of a national or international authority.

DAVIVIENDA may disclose without restrictions any information about its Users that does not identify them and information that does not identify any individual.

4. Communication with the User

DAVIVIENDA may regularly communicate with the User by email, postal mail, telephone, messenger systems, chat, chatbot, or other means to provide the products or services requested by the User or to periodically inform about products, services, events, or special offers.

5. Information Security

DAVIVIENDA adopts reasonable security measures following the applicable laws and the industry best practices to ensure that the User personal information remains safe and updated. However, no transfer of information through the Internet is completely safe despite our best efforts to protect personal information and we cannot ensure or warrant that it is completely safe. The User assumes a reasonable risk level when processing its information and is liable for using and safely keeping any credential, tool, or device needed to use the Site or Applications.

6. Exercise of Rights

DAVIVIENDA respects the control that each User has over its personal information and acknowledges the access, rectification, cancelation, and opposition rights conferred by law. At the request of any User and with previous confirmation of its identity by verifying its identification document, we will confirm if we keep for processing information obtained from said User. Each User has the right to rectify and update incorrect or incomplete personal information, request the cancelation of its personal information, or oppose the processing of its information. On certain cases we will not be able to eliminate the information; for example, if the request is not compatible with our legal, contractual, regulatory, or compliance obligations, if it hinders DAVIVIENDA from exercising its rights conferred by law or by a contract, or if the identity of the petitioner cannot be verified or involves a disproportionate cost or effort. However, the respective request will be answered within the legally established term indicating the pertinent explanations.

7. Minors

The Sites and Applications are destined for a general audience and are not directed to children or minors who have 15 years or less. DAVIVIENDA does not collect or process personal information of children or minors who have 15 years or less unless it is allowed by law. If a User believes that personal information of children or minors of whom it is their legal guardian or representative may have been collected by means of the Sites or Applications, said User may contact DAVIVIENDA to eliminate such personal information when possible and legally binding.

8. Cookies

DAVIVIENDA and/or third parties may supply content and functionality to our Sites or Applications using cookies, beacons, and other similar technologies for several purposes, among which are the following: analyzing trends, managing Sites and Applications, monitoring User browsing on the Sites, and storing demographic information.

Cookies are small information fragments that are stored in the hard drive of devices. A cookie allows the organization that placed it in your device to recognize it in different websites, services, devices, and browsing sessions.; for example, to identify a User when it returns to the Sites to provide a better browsing experience. It is possible to allow cookies owned by third parties on the Sites and we have no control over its use or content. Internet browsers allow Users to configure adjustments to accept or reject cookies or to be informed when a cookie is sent. If the User chooses not to install cookies, possibly it will not fully take advantage of the characteristics and functions of the Sites. For more information about cookies you may visit the public inquiry Sites <http://www.allaboutcookies.org/es/>. Keep in mind that DAVIVIENDA is not affiliated to this third party site and is not liable for it.

Beacons and similar technologies are code fragments embedded into webpages and emails that communicate with third parties. For example, beacons are used to count the number of visits to a webpage, to send or communicate with cookies, and to study Site user patterns. Beacons may also be included in emails to know if messages have been opened, have been reacted to, or have been forwarded.

9. Forums and social media

DAVIVIENDA Sites, Applications, or social media may offer access to public access community forums. The User must keep in mind that any information provided in these areas is public and may be read, collected, and used by DAVIVIENDA and other persons who have access therein. If the User does not want this information to be processed by DAVIVIENDA, said User shall eliminate that information. If it is not able to do so by its own

means, it may expressly request DAVIVIENDA to do so. In some cases, its personal information may not be eliminated.

10. Third party links

DAVIVIENDA Sites, Applications, and social media may have links to websites that are owned, operated, or managed by third parties over which DAVIVIENDA has no control. All information provided by the User on such third party sites will be governed by the policy terms and privacy notice of each website, for which the User shall check such policies prior to disclosing its information on third party websites. DAVIVIENDA does not assume any liability for the content, actions, or policies of third party websites. Including third party website links in our Sites, Applications, or social media in no way constitutes an approval of the contents, actions, or policies of said websites.

11. Third party functionality

It is possible that part of the functionality of the Sites or Applications is provided by third parties that are not linked to DAVIVIENDA. These third parties may collect or receive certain information about the use of the Sites or Applications, even by means of cookies, beacons, and similar technologies. DAVIVIENDA is not liable for the privacy practices of said third parties.

If the User accesses services offered by third parties, such as Facebook, Google, or Twitter by means of the Sites, whether to access the Sites or to share information about its experience in the Sites with other people, said services offered by third parties may collect information about the User such as information about the Site activity, and could share its connections with third party services regarding the use of the Sites following its own privacy policies.

12. Notice Modifications

This Notice was last updated on the date indicated in the heading. DAVIVIENDA reserves its right to modify this Notice at any moment. Using the Sites or Applications after modifications have been made will be deemed as acceptance of such modifications. Be sure to periodically check this Notice to be familiarized with its most current version. The User accepts these changes by using the Sites or Applications after being advised of changes to this Notice.

13. How to contact DAVIVIENDA about these matters

DAVIVIENDA has a commitment to protect your information. If you have any doubts about the personal information processing or if you wish to exercise the rights established in clause 6 of this Notice, you may contact us by the following means:

Address	Edificio Meridiano, Guachipelín de Escazú. San José, Costa Rica
Telephone	2287-1111
Email	ciberseguridad@davivienda.cr

14. Applicable Law and Venue

This Notice is governed by the laws of the Republic of Costa Rica. Any dispute that arises from this Notice will be resolved in the courts of San Jose.