



PRIVACY POLICY

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1. OBJECTIVE

Establish guidelines to safeguard personal data or any other type of information, in order to ensure confidentiality and respect for the constitutional right of individuals to know, update, rectify, modify or delete information that is deposited in the databases and files of Andres Carne de Res Miami®, according to current regulations in the United States.

2. SCOPE

The guidelines stipulated herein shall apply to all areas of the company CIUDAD DEL SOL, LLC, with respect to personal data or any other type of information that is deposited in the databases of Andres Carne de Res Miami® and others operating under this brand, based on the parameters established for the collection, storage, use, circulation, modification, updating, deletion, processing, exchange, transfer and/or transmission of personal data of the owners of the information.

3. GENERAL INFORMATION OF THE DATA CONTROLLER

Name or corporate name:	CIUDAD DEL SOL, LLC
Address:	455 Lincoln Road, Miami Beach, FL. 33139.
E-mail:	[*]
Phone:	[*]

4. APPLICATION AND REGULATORY FRAMEWORK

Andres Carne de Res Miami® in the development of its commercial activities, has designed its Policy for the Treatment of Personal Data, which reflects the principles and rules established in the General Regime of Protection of Personal Data in order to guarantee the right of habeas data of the Holders of the Information of personal information.

This policy has been developed in order to comply with the parameters of self-regulation to a personal data processing that respects all rights and guarantees in terms of privacy of the data subjects about whom we process personal data.

5. MANDATORY

These policies are mandatory and strict compliance by all employees of CIUDAD DEL SOL, LLC, contractors and third parties. In cases where there is no employment relationship must include a contractual clause for those working on behalf of CIUDAD DEL SOL, LLC are required to comply strictly with this policy. Failure to comply with them will result in labor sanctions or contractual liability as appropriate. The above, without prejudice to the duty to respond financially for damages caused to the owners of the information of the data or CIUDAD DEL SOL, LLC for breach of these policies or improper processing of personal data.

6. DEFINITIONS

AUTHORIZATION: Prior, express and informed consent of the Data Subject to carry out the Processing of personal data, which must be obtained by any means that may be subject to subsequent consultation.

PRIVACY NOTICE: Verbal or written communication generated by the Controller, addressed to the Data Subject for the Processing of his personal data, through which he is informed of the scope and general conditions of the processing of his personal data, so that he is able to make informed

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decisions about the use of his personal information and, consequently, maintain control and disposition over it.

DATA BASE: It is an organized set of personal data either in physical or electronic media, regardless of the amount of personal data it contains .

PERSONAL DATA: Any information linked or that may be associated to one or several determined or determinable natural persons.

PUBLIC DATA: Those data contained in public documents, duly executed judicial sentences that are not subject to reserve and those related to the civil status of persons, such as their full name, identification number (citizenship card, T.I., passport), profession or trade, business address, business telephone number, and in general the data that are not qualified as semi-private, private or sensitive. By legal disposition, this type of data DOES NOT REQUIRE AUTHORIZATION OF THE OWNER for its treatment.

PRIVATE DATA: Data that, due to its intimate or reserved nature, is only relevant to the Data Subject. By law, this type of data requires the authorization of the Data Subject for its processing.

SEMI-PRIVATE DATA: Information that is not of an intimate, reserved or public nature and whose knowledge or disclosure may be of interest not only to its owner but also to a certain sector or group of people or to society in general, such as financial and credit data of commercial activity or services: e-mail, personal telephone number (cell phone, residence), residence address. By law, this type of data requires the authorization of the Data Subject for its processing.

SENSITIVE DATA AND SPECIAL TREATMENT: Data that affects the privacy of the Data Subject or whose improper use may generate discrimination, such as those that reveal racial or ethnic origin, political orientation, religious or philosophical convictions, membership in trade unions, social organizations, human rights or that promote the interests of any political party or that guarantee the rights and guarantees of opposition political parties, as well as data relating to health, sex life and biometric data. By law, this type of data requires prior, express, free, unequivocal authorization of the owner of the information for processing, and is not obliged to provide it, if requested by CIUDAD DEL SOL, LLC in its capacity as Data Controller.

PERSON IN CHARGE OF PROCESSING: Natural or legal person, who carries out the Processing of personal data on behalf of the Data Controller.

DATA PROTECTION OFFICER: Area or natural person in charge of ensuring compliance with the Law.

PERSON RESPONSIBLE FOR THE PROCESSING: Natural or legal person, public or private, who decides on the database and/or the processing of the data.

OWNER: Natural person whose personal data are subject to Processing.

PROCESSING: Any operation or set of operations on personal data, such as collection, storage, use, circulation or deletion.

TRANSFER: The transfer of data takes place when the Controller and/or Processor sends the information or personal data to a recipient, which in turn is a Data Controller and is located inside or outside the United States of America.

TRANSMISSION: It involves the communication of personal data within or outside the territory of the

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United States and has as its purpose the performance of a Processing by the Processor on behalf of the Controller.

7. CONTENTS

7.1 Policy

CIUDAD DEL SOL, LLC as a commercial company whose main purpose is the activity of expending to the table of prepared meals and related services respectively, seeking to protect the information of their guests and / or customers, suppliers, partners, users and the general public, has established this policy of treatment of personal data, in order to allocate all necessary means to ensure the confidentiality of information, and generate good practices in the treatment of the same, which rests in their databases, as a subject responsible for the processing of information. In this way it informs the general public, the policy that is developed below.

CIUDAD DEL SOL, LLC in compliance with its mission and vision, establishes, recognizes, ensures and guarantees to have what is necessary for the protection of personal data of its guests and / or customers, suppliers, partners, employees, users, friends of the house and the general public, asking the owner of the information from the beginning, in advance, and duly informed, the express and unequivocal authorization for the processing of information, whose general purpose is the development of its corporate purpose.

7.2. Guiding Principles

- a) **Principle of legality in data processing.** The processing must be subject to the provisions of the Law and other provisions that develop it.
- b) **Principle of purpose.** The Processing must obey a legitimate purpose in accordance with the Law, which must be informed to the Data Subject.
- c) **Principle of freedom.** Processing may only be carried out with the prior, express and informed consent of the Data Subject. Personal data may not be obtained or disclosed without prior authorization, or in the absence of legal or judicial mandate that relieves the consent.
- d) **Principle of truthfulness or quality.** The information subject to Processing must be truthful, complete, accurate, updated, verifiable and understandable.
- e) **Principle of transparency.** The right of the Data Subject to obtain from the Data Controller or the Data Processor, at any time and without restrictions, information about the existence of data concerning him/her, must be guaranteed in the Processing.
- f) **Principle of restricted access and circulation .** Processing may only be carried out by persons authorized by the Data Subject and/or by the persons provided for in Law 1581 of 2012;
- g) **Principle of security.** The information subject to Treatment shall be handled with the technical, human and administrative measures necessary to provide security to the records avoiding their adulteration, loss, consultation, use or unauthorized or fraudulent access.
- h) **Principle of confidentiality.** To guarantee the confidentiality of the information, even after the end of its relationship with any of the tasks that comprise the Processing, being able to provide or communicate personal data only when it corresponds to the development of the activities authorized in the Law and in the terms of the same.
- i) **Principle of temporality, reasonableness and necessity.** The personal data to be processed must

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be strictly necessary for the fulfillment of the purposes pursued with the processing.

7.3. Treatment for which the data are submitted and its purpose when this has not been informed by means of a privacy notice.

Andres Carne de Res Miami® informs its diners, customers, suppliers, collaborators, users, friends of the house and the general public, the various purposes for carrying out the processing of their personal data within the general framework of the development of its corporate purpose, among which are:

- a) **Accounting, fiscal and administrative management** of its suppliers, contractors, clients, collaborators and other third parties through the issuance of invoices; management of collections and payments; contract administration; establishing contact with third parties for the follow-up of administrative activities; keeping accounting or statistical records; submitting reports to the control authorities; updating systems.
- b) **Administrative procedures, justice and judicial procedures, registration and exit of documents, custody and management of information and databases**, through the execution of activities that seek to follow up on the judicial or administrative processes in which Andres Carne de Res Miami® is involved; establish contact with external lawyers to present legal consultations; establish contact with the members of the assembly and corporate governance; follow up on the delivery of internal and external correspondence; file, custody, update and management of the information contained in the databases.
- c) **Security and control of access to facilities**, raise the registration and control of the entry and exit of visitors to the facilities of Andres Carne de Res Miami® and its various commercial establishments through various means such as written records, biometric entry among others; capture, recording, transmission, storage, conservation, reproduction in real time or later of images of diners, employees, suppliers, customers of the company in order to monitor and observe the activities performed by the Holders of the Information in order to ensure the physical security of the Holders of the Information in the different formats of the company.
- d) **Customer loyalty, customer service for the management of PQR**, through the development of various activities such as: registration of reservations in the different Andres Carne de Res Miami® commercial establishments to offer a better experience; remission of gifts to Andres Carne de Res Miami® diners as a recognition for their loyalty to the brand; photographic record of the different types of events or public performing arts shows in order to promote the Andresian experience; offer services of recovery of lost objects; attend to compliments, complaints or claims presented by diners in any of the business formats of Andres Carne de Res Miami®, seeking the satisfaction of diners and the continuous improvement of the service.
- e) **Advertising, marketing, marketing and commercial prospecting, offering of products and services, in the development of its corporate purpose**, various commercial activities are carried out to follow up on the needs of current and potential clients, verification of pending commitments with current clients, contract renewal procedures, presentation of the portfolio of services and definition of negotiation amounts, development of commercial work to recover clientele, establishing contact with suppliers for the acquisition of supplies and production of advertising pieces.
- f) **Human resources, personnel management, social benefits, promotion and employment management, promotion and selection of personnel, training**, follow-up of the activities developed by the employees of Andres Carne de Res Miami® and the fulfillment of the functions assigned to them; effective fulfillment of the obligations of Andres Carne de Res Miami® with its direct and indirect employees as well as with other third parties; execution of activities such as payroll payments, granting of benefits, performance evaluations, issuance of certifications, referencing of credentials, accounting of hours worked and overtime, control of arrival and departure time by

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obtaining biometric data; recreational activities or provision of services for the employees of Andres Carne de Res Miami®; execution of personnel selection processes; reports to judicial or administrative authorities; development of training programs for the employees of Andres Carne de Res Miami®.

g) Technical and administrative management, administration of information systems, key management, user administration, assignment of profiles, users, access keys to the different information systems implemented in Andres Carne de Res Miami® for the development of its corporate purpose.

h) Associative, cultural, recreational, sports and social activities, social assistance, work and social welfare, social promotion of youth, development of projects aimed at the social welfare of children and adolescents; establish contact with the parents of children and adolescents who are part of the social corporate responsibility project, control of attendance and consultation of community participation in the different social and/or environmental work tables carried out by Andres Carne de Res Miami®.

7.4. Informed consent

Informative message, which is communicated verbally or in writing by CIUDAD DEL SOL, LLC to the Holder of the information, through which the processing of personal data is manifested, the Information Processing Policy is socialized, and the purpose of the processing of personal data that will be deposited in our databases is expressed.

7.5. Processing of sensitive data

In the case of sensitive personal data, it may be used and processed when:

- a) The Data Subject grants his/her explicit authorization to such processing, except in those cases where the Law does not require the granting of such authorization. It is the duty of the Data Controller to inform the Data Subject explicitly and in advance, which data are sensitive and what will be the purpose of the treatment that will be given to them. Likewise, the Data Subject must know that, since it is sensitive data, he/she is not obliged to authorize its processing.
- b) The Processing is necessary to safeguard the vital interest of the Data Subject and he/she is physically or legally incapacitated. In these events, the legal representatives must grant their authorization.
- c) The Processing is carried out in the course of legitimate activities and with due guarantees by a foundation, NGO, association or any other non-profit organization, whose purpose is political, philosophical, religious or trade union, provided that they refer exclusively to its members or to persons who maintain regular contacts by reason of their purpose. In these events, the data may not be provided to third parties without the authorization of the Data Controller.
- d) The Processing refers to data that are necessary for the recognition, exercise or defense of a right in a judicial process.
- e) The Processing has a historical, statistical or scientific purpose. In this event, the measures leading to the suppression of the identity of the Information Holders must be adopted.

7.6. Processing of personal data of children and adolescents

The processing of personal data of children and adolescents is prohibited, except in the case of data of a public nature, and when such processing complies with the following parameters and/or

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requirements:

- That they respond to and respect the best interests of children and adolescents.
- To ensure respect for their fundamental rights.

Once the above requirements have been met, the legal representative of the children or adolescents will grant the authorization, after the minor has exercised his or her right to be heard, an opinion that will be assessed taking into account the maturity, autonomy and capacity to understand the matter.

7.7. Rights of the Data Subjects and conditions of legality for Data Processing

- a) Know, correct and update your personal data before the data controllers or data processors, if they are incorrect, incomplete or used improperly, even if they are fractioned or prohibited by law.
- b) Request proof of the authorization granted to the Data Controller for the use of your data, unless the Law excludes it.
- c) Be informed by the Data Controller or the Data Processor, upon request, about how your personal data is used.
- d) File complaints before the Superintendence of Industry and Commerce, if the rules of Personal Data Protection are violated.
- e) To revoke the authorization and/or request the deletion of the data when the Processing does not respect the principles, rights and constitutional and legal guarantees. The revocation and/or deletion will proceed when the Superintendence of Industry and Commerce has determined that in the Processing the Controller or Processor has incurred in conduct contrary to applicable regulations and the Constitution.
- f) Access free of charge to your personal data that have been subject to Processing.

7.8 Duties of the Controllers and Processors:

- a) To guarantee to the Data Subject the full and effective exercise of the Right to Protection of Personal Data.
- b) To inform the Data Subject about the purpose of the collection and the rights that assist him/her due to the authorization granted.
- c) Keep the information under the necessary security conditions to avoid its alteration, loss, unauthorized access or fraudulent use.
- d) To inform the data protection authority when there are violations to the Law or there are risks in the administration of the information of the Information Holders.

7.9. Procedure for the correction, modification, updating, rectification and/or deletion of Data.

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The Data Subject or his/her assignees who consider that the information contained in a database should be corrected, updated or deleted, or when they notice the alleged breach of any of the duties contained in this law, may file a claim by means of a reasoned written communication addressed to the e-mail address [*] in accordance with the following:

1. Claim request through a reasoned letter addressed to CIUDAD DEL SOL, LLC duly identified in his capacity as Holder, with a description of the facts that give rise to your request and / or claim, physical and / or electronic notification data, and accompanying documents that you want to assert.
2. If the claim is incomplete, the interested party will be required within five (5) days of receipt of the claim to correct the faults. After two (2) months from the date of the requirement, without submitting the required information, it will be understood that the claim has been abandoned.
3. Once the complete claim has been received, within two (2) business days, a legend will be included in the database stating "CLAIM IN PROCESS" and the reason for the claim, and the legend will be maintained until the claim is decided.
4. CIUDAD DEL SOL, LLC shall address the claim within fifteen (15) working days from the day following the date on which the request and / or claim was received. If it is not possible to address the claim within that period, the interested party will be informed of the reasons for the delay and the date on which the claim will be addressed, which in no case may exceed five (5) working days following the expiration of the first term.

If the request is the correction, modification, update or clarification of the information contained in our databases, we will proceed to make the corresponding record notifying the information in accordance with the data provided by the Owner of the Information.

If your request is the deletion of the data contained in our databases, within five (5) days following the decision of your request, the processing of the information will stop, and we will proceed to permanently delete the information contained in our databases.

7.10. Guarantees of the right of access

CIUDAD DEL SOL, LLC will guarantee the right of access when, upon accreditation and legitimacy of the identity of the Holder, available to it, at no cost or expense, in a detailed and detailed manner, the respective personal data through all types of media, including electronic media that allow direct access to them by the Holder. Such access shall be offered without any limit whatsoever and shall allow the Data Subject the possibility of knowing and updating them online.

7.11. Channels of attention to Information Holders

- The e-mail [*], where the Information Holders may make different types of requests such as: Consultations or requests to update data, petitions, complaints, claims, ask questions about the Processing of Personal Data, etc.
- On the web page www.andresmiami.us you will find a form that is displayed and which must be filled out if you wish to make any type of request.
- The data subjects may contact the data controller at the facilities located at 455 Lincoln Road, Miami Beach, FL. 33139.
- Customer service line [*].

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7.12. Consultations

The Owners of the Information may consult the personal information of the Holder that is contained in any database. Consequently, CIUDAD DEL SOL, LLC will guarantee the right of consultation, providing the owners of the information, all the information contained in the individual record or that is linked to the identification of the holder. With respect to the attention of requests for consultation of personal data CIUDAD DEL SOL, LLC guarantees:

- Enable electronic means of communication or others considered relevant. Establish forms, systems and other simplified methods, which must be informed in the privacy notice.
- Use the customer service or claims services it has in operation. In any case, regardless of the mechanism implemented for the attention of consultation requests, they will be answered within a maximum term of fifteen (15) business days from the date of receipt.
- When it is not possible to attend the consultation within such term, the interested party shall be informed stating the reasons for the delay and indicating the date on which the consultation will be attended, which in no case may exceed five (5) working days following the expiration of the first term.

7.13. Claims

The Owners of the Information, who consider that the information contained in a database should be corrected, updated or deleted, or when they notice the alleged breach of any of the duties contained in the Law, may file a complaint with the Data Controller, channeling it and sending it to the service channels mentioned in section 7.12 of this document.

7.14. Rectification and updating of data.

CIUDAD DEL SOL, LLC has the obligation to rectify and update at the request of the Holder, the information that proves to be incomplete or inaccurate, in accordance with the procedure and terms outlined above. In this regard, the following shall be taken into account:

In requests for rectification and updating of personal data the Holder must indicate the corrections to be made and provide documentation to support your request. CIUDAD DEL SOL, LLC, is free to enable mechanisms to facilitate the exercise of this right, as long as they benefit the Holder. Consequently, it may enable electronic or other means it deems appropriate. CIUDAD DEL SOL, LLC may establish forms, systems and other simplified methods, which must be reported in the privacy notice and will be made available to interested parties on the website.

7.15. Data deletion

The Data Subject has the right, at any time, to request CIUDAD DEL SOL, LLC, the deletion (removal) of his/her personal data when:

- a. Consider that they are not being treated in accordance with the principles, duties and obligations set forth in the regulations in force.
- b. Are no longer necessary or relevant for the purpose for which they were collected.
- c. The period necessary for the fulfillment of the purposes for which they were collected has been exceeded.

This deletion implies the total or partial elimination of personal information as requested by the

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Data Subject in the records, files, databases or processing carried out by CIUDAD DEL SOL, LLC
It is important to note that the right of cancellation is not absolute and the responsible may deny the exercise of the same when:

- a. The Data Subject has a legal or contractual duty to remain in the database.
- b. The deletion of data hinders judicial or administrative proceedings related to tax obligations, the investigation and prosecution of crimes or the updating of administrative sanctions.
- c. The data is necessary to protect the legally protected interests of the Data Subject; to carry out an action in the public interest, or to comply with an obligation legally acquired by the Data Subject.

7.16. Revocation of the Authorization

The owners of the information may revoke consent to the processing of their personal data at any time, provided that it is not prevented by a legal or contractual provision. To do this, CIUDAD DEL SOL, LLC shall establish simple and free mechanisms that allow the Data Subject to revoke their consent, at least by the same means by which it was granted.

It should be noted that there are two ways in which the revocation of consent may occur. The first can be on the totality of the consented purposes, that is, CIUDAD DEL SOL, LLC must completely stop processing the data of the Holder; the second can occur on specific types of treatment, such as for advertising or market research purposes.

With the second modality, that is, the partial revocation of consent, other purposes of the processing that the Controller, in accordance with the authorization granted, may carry out and with which the Data Subject agrees, are maintained.

8. INFORMATION SECURITY AND SECURITY MEASURES

In developing the principle of security established in the current regulations, CIUDAD DEL SOL, LLC will adopt effective internal policies and mechanisms to ensure that the technical, human and administrative measures necessary to provide security to the records to prevent tampering, loss, consultation, use or unauthorized or fraudulent access.

9. SECURITY OF FACILITIES BY MEANS OF VIDEO SURVEILLANCE SYSTEMS

CIUDAD DEL SOL, LLC, has a video surveillance system and security cameras inside its facilities and at access points, as part of its security programs.

The images, photographs, captured and/or filmed videos, recordings and captured images have a limited recording record, which after this time will be deleted.

In no way these images, recordings and / or filming will be used or shared with third parties for commercial purposes or activities other than to preserve the security and surveillance of the facilities of CIUDAD DEL SOL, LLC, and will only deliver the videos or recordings by request of competent authority in exercise of its legal functions and undertakes to carefully review the information to be delivered, so as not to violate the dignity, privacy or good name of any of the persons who may appear in such images or videos.

CIUDAD DEL SOL, LLC, will inform users through the publication of notices and / or audio or video announcements, about the implementation of video surveillance systems, which will contain at least the content of a privacy notice.

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10. RELATED DOCUMENT

Privacy Notice.

11. VALIDITY

This Personal Data and Information Processing Policy repeals all previous provisions, and is effective as of November 1, 2024.

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REVIEWED AND APPROVED

CONSTANZA NOVOA
PROCESS COORDINATOR

DANIELA PEÑA
PERSONAL DATA PROTECTION OFFICER

LAURA MEDINA
LEGAL MANAGER

LAURA TARAZONA
PRESIDENT DIVINE PROVIDENCE



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CHANGE CONTROL

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