

## Privacy Policies

### 1 – Introduction

At Urbanova Inmobiliaria S.A.C. and the real estate companies we manage, we recognize the importance of protecting the personal data of our clients and users. Therefore, in compliance with Law No. 29733 – the Personal Data Protection Act, its Regulations approved by Supreme Decree No. 016-2024-JUS, and the Guidelines issued by the National Authority for the Protection of Personal Data, we have adopted technical, organizational, and legal measures designed to ensure that the processing of your data is carried out in a lawful, transparent, and secure manner.

With this Policy, we reaffirm our commitment to act with diligence, responsibility, and respect for privacy, ensuring that the processing of personal data is carried out in strict compliance with current Peruvian regulations and in the interest of our customers' trust.

This Policy takes into account the provisions of current Peruvian regulations on the protection of personal data, which include, among others, Law No. 29733—the Personal Data Protection Act, Supreme Decree No. 016-2024-JUS—Regulations of the Personal Data Protection Act, as well as its complementary rules and relevant directives.

In this document, we detail the purposes for which we use the information you provide to us, who is responsible for processing it, with whom it is shared, how long it is stored in our databases, as well as the security measures in place and the means by which you can exercise your rights as the data subject.

### 2 - Collection and Use of Information in General

When you use our websites, apps, physical forms, and social media platforms, we may collect certain information from you with your express prior consent; and, in certain cases permitted by law, without your consent.

This information may be combined with information we may already have about you so that we can process it using automated means and create profiles, always with the aim of improving our ability to serve you, tailoring our content and offers, and providing you with the opportunity to purchase products or services that we believe may be of interest to you.

### 3 – Specific Terms and Conditions Regarding the Processing of Your Personal Data

The following specific terms and conditions for the processing of personal data will apply depending on the relationship that Urbanova Inmobiliaria S.A.C. and/or any of the companies it manages has with each data subject. The table below provides information on from whom we collect personal data and for what purposes we process it:

If you contact us via:	Data collection and purposes	Retention period
<b><u>CONTACT FORM, GENERATION CAMPAIGNS, LANDING PAGES, PUBLIC SURVEYS:</u></b> <b><u>US LEAD</u></b>	Your personal data will be stored in our “WEBSITE USERS” database and will be processed for the following purposes: To contact interested individuals who provide their information in the forms in order to respond to inquiries, comments, and/or requests for information. To send you information about the spaces	Up to 2 years

<p>When you provide us with your information to:</p> <ul style="list-style-type: none"> <li>• Receive information about available spaces in our shopping centers.</li> <li>• Receive information about potential leasing opportunities in our corporate buildings.</li> <li>• Participate in promotional campaigns and access benefits.</li> </ul> <p>When, through any means of communication, you authorize the processing of your data for marketing and promotional purposes.</p>	<p>available at our shopping centers and corporate buildings, as well as other requested services. Organize and carry out promotional events open to the public, event invitations, sweepstakes, and other activities for which you register, in accordance with the terms and conditions established for them. Conduct surveys with a strategic relational focus to collect customer information that helps Urbanova improve the value proposition we deliver, whether to Decision Makers (contractors) or to users (office workers or retail visitors). The data in this second group is requested for: 1) internal verification of the respondent, 2) sending relevant information about events at the buildings and/or shopping centers with your consent. When you expressly authorize us to process your data for commercial prospecting and promotion purposes, we may store your information indefinitely, until you revoke your authorization, to:</p> <p>Contact you by any appropriate means to inform you about events, news, services, commercial promotions, and any other marketing, advertising, and commercial promotion activities. To this end, we may carry out these purposes based on your profiling through automated and/or non-automated methods, using pre-designed algorithmic systems that involve automated decision-making regarding your interests. Without your express consent to engage in marketing and sales promotion activities, we will not carry out these activities.</p>	
<p><b><u>COMPLAINT BOOK USER</u></b></p>	<p>When you decide to submit a complaint form through our website, your personal information will be stored in our “COMPLAINTS AND CLAIMS” database solely for the purpose of processing the form, evaluating the case, responding to you, and complying with the obligations set forth in the Consumer Protection and Defense Code.</p> <p>Without your personal information, we will not be able to fulfill these purposes.</p>	<p>For up to 2 years, unless there is a legal proceeding (litigation, dispute, etc.) that requires it to be retained for a longer period.</p>

#### 4 – Compartición de sus datos personales

We may share your information with our affiliates, service providers, and other third parties, which may be located within or outside the country, for the following general purposes:

- To provide, manage, and improve our websites, applications, products, content, or services.
- To conduct customer studies and surveys,
- Cloud data storage and processing.
- Hosting and storage services.
- Website management and IT support.
- Compliance with corporate policies.
- To carry out advertising activities.

A detailed list of third parties can be found in the Appendix to this policy. In such cases, Urbanova Inmobiliaria S.A.C. and/or any of the companies it manages will ensure that the processing of your data is limited to the purposes indicated above, that its confidentiality is maintained, and that appropriate security measures are implemented.

## **5 – Exercising your rights**

You may exercise any of the rights provided for in Law No. 29733, the Personal Data Protection Act, such as the right to information, revocation, access or portability, rectification, objection, or erasure, by contacting us via email at [legal@urbanova.com.pe](mailto:legal@urbanova.com.pe) or by sending a written request to the address: Av. Las Begonias 415, 7th Floor, San Isidro, Lima, Peru, with the subject line “Personal Data.” Your request must be accompanied by a copy of your ID card, and if submitted electronically, it may be signed with a digital signature.

If you believe your request has not been adequately addressed, you may file a complaint with the National Authority for the Protection of Personal Data by visiting the Reception Desk of the Ministry of Justice and Human Rights located at Calle Scipión Llona No. 350, Miraflores, Lima, Peru.

Additionally, with every marketing email you receive from us or any of our business units, you will be given the opportunity to indicate whether you wish to opt out of receiving future marketing emails from us. You can adjust your communication preferences by following these unsubscribe instructions:

- Access your email preferences on the account settings page to opt out of our email communications
- For mobile SMS messages, you can opt out of receiving future messages by replying with the words “STOP” or “END”
- By choosing to deactivate or delete your information or request other changes that may negatively affect the delivery of our products and services, you may no longer receive information from us or continue to enjoy the level of service we have previously provided. Or, we may simply be unable to provide our services to you. We do not recommend this without understanding the consequences.

## **6 - Underage children**

We do not knowingly seek or collect information from minors.

If you provide us with your personal information as a visitor to our website, we will assume that you are of legal age.

If we become aware that we have collected information from a minor without the consent of a parent or guardian, we will make every reasonable effort to delete that information from our records. Furthermore, where it is not possible to delete such information, we will ensure that it is not used for any purpose or disclosed to third parties.

## **7 – Personal Data Security**

Urbanova Inmobiliaria S.A.C. and the companies under its management implement all necessary legal, technical, and organizational security measures to ensure the security of users’ personal data, taking into account the state of technology, the nature of the stored data, and the risks to which it is exposed, whether arising from human action, the physical environment, or natural causes, in accordance with current Peruvian law.

These security measures reduce the risks of possible alterations, losses, and/or unauthorized processing or access that could affect the integrity, confidentiality, and availability of the information.

Furthermore, we have implemented additional security measures to reinforce the confidentiality and integrity of the information, and we continuously monitor, control, and evaluate our processes to ensure the privacy of personal data entered through the website.

## **8 - Changes to This Policy**

We reserve the right to make changes to this privacy policy at any time. If we make a material change to this policy, we will notify you in a timely manner, as appropriate or required by law.

## **9 – Data Protection Officer**

For more information about our privacy policy, including inquiries, complaints, or disputes regarding the collection and use of your information, please contact our Data Protection Officer:

Name: Daniel Enrique Muñoz Zaldivar

Email: [dmunoz@urbanova.com.pe](mailto:dmunoz@urbanova.com.pe)

## APPENDIX

9. BLAST RADIUS PERU S.A.C.; Address: 411 Contralmirante Montero Street, Suite 1201 (formerly Alberto del Campo), Magdalena del Mar district, Lima; for the purposes of website management and advertising agency services.
10. CENTRIA SERVICIOS ADMINISTRATIVOS S.A.C.; Address: 475 Las Begonias St., Suite 304b, San Isidro, Lima; which provides us with comprehensive IT support.
11. ENTRETENIMIENTO SOL EIRL; Address: 170 Alfa Gemelos Street, La Calera de Monterrico neighborhood (near Block 6 of Main Avenue), Surquillo district, Lima; which provides us with BTL (below-the-line) marketing services.
12. MICROSOFT CORPORATION; Address: One Microsoft Way, Redmond, Washington WA 98052, United States, which provides us with SharePoint and OneDrive cloud services.
13. ORACLE CORPORATION; Address: 2300 Oracle Way, Austin, Texas, United States, which provides us with the SAP S4/HANA platform
14. QUALTRICS INTERNATIONAL, INC., Address: 333 W River Park Drive, Provo, Utah 84604, United States, which provides data repository and statistical analysis services.
15. GOOGLE LLC; Address: 1600 Amphitheatre Parkway, Mountain View, CA 94043, United States, which provides us with website hosting services.
16. HubSpot, Inc.; Address: 25 First Street, Cambridge, Massachusetts 02141, United States.