

	Process	Gestión de la Dirección (GDIR)	Type	Otros
	Name	Política de Privacidad	Code	GDIR-OT-07

Privacy Policy

At WORLDWIDE CARGO LOGISTICS CIA. LTDA., we are committed to informing data subjects about the processing of their personal data and ensuring the appropriate use of the provided information.

1. OBJECTIVE

To establish the principles, guidelines, and procedures for the collection, processing, storage, retention, modification, deletion, communication, and transfer of personal data at WORLDWIDE CARGO LOGISTICS CIA. LTDA., in compliance with the Organic Law on Personal Data Protection (LOPD).

This policy ensures the responsible management of data belonging to suppliers, exporters, employees, and clients, through clear handling parameters and mechanisms that allow data subjects to access, update, rectify, or revoke the use of their information, under a framework of transparency, integrity, and respect for their rights.

2. SCOPE

This policy applies to all processes involving the processing of personal data within WORLDWIDE CARGO LOGISTICS CIA. LTDA., including members of the Board of Directors, employees, suppliers, clients, and any interested parties.

It extends to all internal operations and to third parties involved in data management, both nationally and internationally.

3. TERMS AND DEFINITIONS

- **LOPD:** Organic Law on the Protection of Personal Data published on May 26, 2021.
- **Data Controller:** WORLDWIDE CARGO LOGISTICS CIA. LTDA., which determines the purposes and means of personal data processing.
- **Data Subject:** Natural person whose data is subject to processing.
- **Personal Data:** Information that identifies or renders a natural person identifiable.
- **Sensitive Data:** Data that, by its nature, requires special protection (health, ideology, ethnic origin, etc.).
- **Data Processor:** Third party that processes data on behalf of WORLDWIDE CARGO LOGISTICS CIA. LTDA.
- **Incident:** Personal data security breach.

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- **Processing Activity:** Any operation or set of operations performed on personal data or sets of personal data.
- **Data Protection Incident:** Personal data breach (security breach) such as the accidental or unlawful destruction, loss, or alteration of information.
- **Service Provider or Data Processor:** Person or entity providing services to WORLDWIDE CARGO LOGISTICS CIA. LTDA. related to data processing.
- **Data Protection Officer (DPO):** Person designated by WORLDWIDE CARGO LOGISTICS CIA. LTDA. to supervise, advise on, and ensure compliance with regulations.

4. REGULATORY FRAMEWORK

Under the Constitution of the Republic of Ecuador, and considering the fundamental right to data protection and privacy in personal data processing, WORLDWIDE CARGO LOGISTICS CIA. LTDA. has developed this Privacy Policy on Data Protection (hereinafter “Policy”) for the purpose of complying with the legal provisions of Ecuador, particularly adhering to the provisions established in the Organic Law on Personal Data Protection published in Official Register Supplement 459 on May 26, 2021.

WORLDWIDE CARGO LOGISTICS CIA. LTDA. is fully aware of the importance of current privacy and data protection regulations. In this regard, it prioritizes the protection of the security, integrity, accuracy, and confidentiality of data provided by suppliers, clients, partners, and employees, acting in a responsible and transparent manner.

5. IDENTIFICATION OF THE DATA CONTROLLER

WORLDWIDE CARGO LOGISTICS CIA. LTDA. is domiciled in the municipality of Quito, Tababela parish, located at Calle Nicolás Baquero N2-2 and Intersection N2, SS Cargo Center Building, Office 3, Floor 1, next to the Alpachaca connector bridge, Ecuador, with Tax Identification Number (RUC) 1791761502001, telephone number 023599051.

WORLDWIDE CARGO LOGISTICS CIA. LTDA. (hereinafter, “WCL”) acts as the Data Controller for the personal data it collects within the framework of its commercial, logistical, administrative, labor, and contractual operations.

6. DATA SUBJECT TO PROCESSING AND PURPOSES OF PROCESSING

WCL will process personal data for the following purposes:

a. Suppliers:

Collecting the required supplier information through the Supplier Data Form, where the requested information will be entered: Supplier Commercial Name, Tax Identification

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Number (RUC), Business Name, Email Addresses, Telephone Numbers, Address, Bank Details, Commercial References, Legal Representative.

Using the data subjects' information for the following purposes.

- Verify the authenticity and validity of documents provided by the supplier.
- Comply with internal and external audit, financial, accounting, tax, or quality control obligations.
- Review compliance with parameters and requirements requested by the company for the qualification, selection, and evaluation of suppliers of goods and services.
- Draft contracts / agreements defining rights, obligations, service terms, and guarantees aligned with the company.
- Create an identification code in the internal supplier database.
- Store information and documentation in physical and digital files to back up supplier selection processes.
- Manage payment for goods and services acquired by the company.
- Control and monitor entry to and stay within company facilities through closed-circuit television (CCTV) and entry and exit logs.
- Use information to request a service or product.
- Coordinate and manage air cargo transportation services when the supplier is an airline, including flight scheduling, space reservation, shipment confirmation, issuance and management of air waybills (AWB), and cargo tracking.
- Comply with operational, customs, and security requirements related to air transport operations.

b. Exporters:

Collecting the required exporter information through the exporters' website portal or through the operations coordination department for operational purposes, such as: Commercial Name, Tax Identification Number (RUC), Business Name, Email Addresses, Telephone Numbers, Address and Postal Code, Website, First and Last Names, Job Title, Legal Representative or Attorney-in-Fact Details, Customs and Logistics Data, Assigned Drivers and Vehicles Details (first and last names, ID number, phone number, license plate).

Storing the provided information on the digital platform for 6 months while automatically requesting an update of such information from exporters. The information of exporters who do not update their data will be stored for as long as necessary to fulfill the intended purpose set forth in this policy, preventing its tampering, loss, and unauthorized access by third parties, or until the data subject revokes the authorization granted for data processing.

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- Using the data subjects' information for the following purposes:
- Manage necessary documentation for export operations, such as air waybills (AWB), manifests, packing lists, certificates, authorizations, and customs documents.
- Manage and execute the electronic filing of the Export Customs Declaration (DAE) before competent authorities.
- Establish a Username and Password.
- Coordinate the reception, registration, and verification of cargo delivered for export.
- Validate commercial and operational documentation issued by the exporter.
- Perform operational activities for the preparation, distribution, and delivery or return of cargo.
- Notify the exporter of cargo inspection results, observations, incidents, or rejection notifications from airlines or regulatory authorities.
- Provide adequate and timely customer support to address inquiries, requests, complaints, and claims.
- Coordinate logistics requirements with airlines.
- Manage access to operational zones for both farm/plantation staff and transport vehicles.
- Register and store personal data in the company's database.
- Create an identification code in the internal exporter database.
- Coordinate the entry, stay, and departure of vehicles and personnel at company facilities.
- Verify the identity of the driver and the vehicle assigned to the cargo.
- Manage cargo delivery, pickup, or return.
- Control and monitor entry to and stay within company facilities through closed-circuit television (CCTV) and entry and exit logs.

c. Collaborators

Collecting the required information from the employee through the Personal Data Form and Resumes (CVs), where the requested information will be entered, such as: First and Last Names, National ID Number, Nationality, Date of Birth, Home and Emergency Telephone Numbers, Email Address, Driver's License, Marital Status, Number of Children, Blood Type, Home Address, Emergency Contact, Biometric Data, Financial Data, Education Level, among others.

Using the data subjects' information for the following purposes:

- Manage the pre-selection and selection process of applicants through the evaluation, qualification, and verification of information.

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- Contact candidates for hiring for a specific position or for future selection processes.
- Manage the payroll process, social security affiliation, creation of medical records, and conducting occupational medical examinations.
- Manage the payment of salaries and statutory employee benefits derived from the execution of the employment contract and/or its termination.
- Share necessary information with suppliers and strategic partners to perform medical examinations, occupational evaluations, and other activities inherent to the onboarding process, job execution, and benefits administration during the term of the employment relationship.
- Register employee information in WCL's databases.
- Comply with WCL's labor obligations as an employer, as established by labor legislation, the employment contract, the Internal Work Regulations, and Corporate Policies.
- Parameterize codes, usernames, and credentials for access to technological resources used by the company to carry out its operations.
- Issue corporate ID cards containing the employee's personal data and photo/image.
- Manage and update the employee's personnel file throughout the employment relationship and following its termination, in accordance with applicable legal retention periods.
- Manage continuous training, instruction, and professional development through internal or external programs.
- Conduct performance evaluations, work climate assessments, and internal surveys.
- Monitor and log personnel entry and exit using biometric systems, ensuring security and proper working hours tracking.
- Monitor and supervise stay within company facilities through closed-circuit television (CCTV).
- Inform the employee of any modification to the contractual relationship.
- Process family members' information in case of emergency.
- Any other purpose necessary to carry out WCL's corporate purpose and business activities.

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d. Clients:

Customer information may be collected through the website, digital forms, communications with the coordination department, or through any other authorized channel for operational purposes, such as: Basic Company Information, Owner Information, Name, Email Addresses, Telephone Numbers, Address and Postal Code, Bank References, Commercial References, Contact Person's First and Last Names, Customs and Logistics Data.

Using the data subjects' information for the following purposes:

- Review compliance with parameters and requirements requested by the company for client onboarding and approval.
- Create an identification code in the internal client database.
- Store information and documentation in physical and digital files for record-keeping and backup.
- Manage the issuance, review, and control of invoices corresponding to the acquired services.
- Manage, prepare, and file the Export Customs Declaration (DAE), as well as issue air waybills (AWB) and other documents required for foreign trade operations before the corresponding authorities and operators.
- Carry out debt collection processes, payments, and reconciliations, including contacting the client for reminders or notifications regarding outstanding obligations.
- Conduct satisfaction surveys, quality assessments, and customer experience evaluations to improve the company's products, services, and internal processes.
- Execute operational activities related to the preparation, handling, distribution, and delivery of cargo or contracted services.
- Maintain communication channels with the client, including notifications about service updates, operational changes, improvements, or relevant matters concerning the commercial relationship.
- Adequately and timely address inquiries, requests, complaints, or claims.
- Register and store information in the company's internal databases.
- Assign a unique code or identifier within internal systems.
- Comply with legal, tax, customs, and regulatory compliance obligations, as well as requests from competent authorities.

7. SENSITIVE DATA

WCL guarantees the security and confidentiality of sensitive data, such as:

- Health data (protected by medical confidentiality).
- Credit or financial data.
- Minors' data.

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- Data of persons with disabilities. The data will be stored on proprietary or third-party servers that meet protection standards, whether within or outside the country. Data retention will take place only with the data subject's authorization and in compliance with security measures.

8. PRINCIPLES TO BE APPLIED BY WCL, ITS EMPLOYEES, AND SUPPLIERS FOR THE PROPER PROCESSING OF PERSONAL DATA

- Principle of Legality: Personal data must be processed in strict compliance with the principles, rights, and obligations established in the Constitution of Ecuador, international instruments, the Law, its Regulations, and all other applicable regulations and jurisprudence.
- Principle of Fairness: The processing of personal data must be fair. Therefore, it must be clear to data subjects that personal data concerning them is being collected, used, consulted, or otherwise processed, as well as the ways in which such data is or will be processed. Under no circumstances may personal data be processed through unlawful or unfair means or for unlawful or unfair purposes.
- Principle of Transparency: The processing of personal data must be transparent; therefore, all information or communication relating to this processing must be easily accessible and easy to understand, using clear and plain language. Relationships derived from the processing of personal data must also be transparent.
- Principle of Purpose Limitation: The purposes of processing must be clear, legitimate, and communicated to the data subject. Personal data may not be used for purposes other than those informed at the time of collection, except when there is a legal basis that permits a new processing. They may only be used for a different purpose if it is compatible with the original purpose, taking into account the context in which they were provided, the information given to the data subject, their reasonable expectations, the nature of the data, the possible consequences, and the safeguards applied in both processing.
- Principle of Data Minimization and Relevance: Personal data must be adequate, relevant, and limited to what is strictly necessary in relation to the purposes for which they are processed.
- Principle of Confidentiality: The processing of personal data must be conducted with strict confidentiality. Data may not be used or shared for purposes other than those authorized, unless there is a legal basis permitting a new processing. The controller shall implement the technical and organizational measures necessary to ensure this duty of secrecy.
- Principle of Accuracy and Data Quality: Personal data must be accurate, complete, clear, and kept up to date to ensure their truthfulness. If incorrect information is identified, it will be corrected or erased without delay. When a processor is involved, the controller remains responsible for ensuring the accuracy and quality of the data.

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- Principle of Storage Limitation: Personal data shall be kept for no longer than is necessary for the purposes for which they were collected. The controller will establish timeframes for their erasure or periodic review. Any extended retention shall only be permitted for public archiving, scientific or historical research, or statistical purposes, provided that appropriate security safeguards are implemented to protect the data subject's rights.
- Principle of Personal Data Security: Data controllers and processors must implement all appropriate and necessary security measures to protect personal data against any risk, threat, or vulnerability, taking into account the nature of the personal data, as well as the scope and context.
- Principle of Proactive and Accountable Responsibility (Accountability): The data controller must demonstrate the implementation of personal data protection mechanisms and compliance with the principles, rights, and obligations set forth by law. To this end, the controller may rely on standards, best practices, codes, certifications, or other appropriate mechanisms depending on the data type and risk level. Furthermore, the controller must remain accountable for processing activities before the data subject and the Data Protection Authority. These mechanisms must be continuously reviewed and updated to ensure their effectiveness.
- Principle of Interpretation Favorable to the Data Subject (In Dubio Pro Titular): In case of doubt regarding the scope of legal or contractual provisions applicable to personal data protection, judicial and administrative officials shall interpret and apply them in the manner most favorable to the data subject.

9. CONSENT

In compliance with the legal framework for personal data protection, WCL declares that it will utilize adequate and sufficient mechanisms to obtain the prior, freely given, specific, informed, and unambiguous authorization and consent of suppliers, employees, clients, and exporters through various documents, forms, the website, or any other format that allows for subsequent consultation, for the processing of personal data in the applicable database among those existing at WCL. As the data controller, WCL will retain proof of the authorization granted by clients, suppliers, employees, or, failing that, of the legal basis for the processing carried out. The data subject shall be entitled to withdraw at any time, without retroactive effect, any consent previously granted to authorize the processing of their data for a specified purpose.

10. COMMUNICATIONS OR INTERNATIONAL TRANSFER TO SPECIFIED THIRD PARTIES

WCL may communicate or transfer personal data of clients, exporters, suppliers, and employees to third parties solely when necessary to fulfill the specific purposes of the

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services it provides and to ensure the proper functioning of its operational, administrative, logistical, and commercial activities.

These transfers may be made to:

- Related or affiliated companies.
- Domestic or international logistics partners.
- Technology, storage, or information maintenance service providers.
- Carriers, freight forwarders, airlines, shipping lines, insurance companies, and foreign trade operators.
- Financial institutions, payroll service providers, and labor management companies.
- Competent public authorities when required by legal obligation.

In all cases, WCL ensures that third parties receive only the information strictly necessary to fulfill the relevant purpose and are required to maintain the confidentiality, security, and proper use of the data in accordance with the Organic Law on Personal Data Protection and applicable contractual agreements.

WCL will not transfer personal data for purposes other than those established herein and, when required, will seek the prior consent of the data subject.

11. RETENTION

Data will be retained only for the time necessary to fulfill the established purposes. Once the purpose has been fulfilled, WCL will delete, anonymize, or archive the data in accordance with the law.

12. IMPACT ASSESSMENT

When a processing activity—specifically the implementation of a new technology or IT system—is likely to result in the processing of personal data and a high risk to individual rights and freedoms, taking particular account of the nature, scope, context, and purposes of the proposed processing activity, a data protection impact assessment shall be carried out prior to the commencement of the processing activity.

13. SECURITY MEASURES

WCL will implement all technical and organizational measures necessary to ensure the protection of personal data, in accordance with current regulations. The company will safeguard the confidentiality, integrity, and availability of information, considering the data subjects' personal data as a valuable asset that must be protected against loss, unauthorized access, or any type of improper processing.

To this end, WCL applies various security controls and practices, including: information access control, digital information security, document management security, physical

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security, secure authentication mechanisms, data backup and recovery, and network security controls.

However, WCL is not liable for illegal interceptions or for the breach of its systems or databases carried out by unauthorized third parties when such acts are beyond its control.

14. RIGHTS

Right of Access: The data subject may consult their personal data processed by WCL free of charge. The controller must provide access within 15 days.

Right to Rectification and Updating: The data subject may request that their data be corrected or updated by submitting the corresponding supporting documentation. WCL must respond to the request within 15 days and, where applicable, inform those who received the data.

Right to Erasure (Deletion): The data subject may request the deletion of their personal data when they are no longer necessary, do not comply with the law, infringe upon rights, their retention period has expired, or the data subject withdraws their consent. WCL must securely erase them within 15 days.

Right to Object: The data subject may object to the processing of their data in cases permitted by law, particularly to prevent processing for direct marketing purposes or when a legitimate interest affects their personal situation. The request must be addressed within 15 days.

Right to Data Portability: The data subject may receive their data in a compatible format or request that WCL transfer them to another controller, provided it is technically feasible. Following the transfer, the data will be erased unless otherwise specified by the data subject.

Right to Restriction of Processing: The data subject may request that the use of their data be restricted while its accuracy is being verified, when the processing is unlawful, when the data is no longer needed for the initial purpose, or while an objection is pending. During the restriction period, the data may only be processed for legal claims, the protection of rights, or the public interest.

Right Not to Be Subject to Automated Decisions: The data subject has the right not to be subjected to decisions based wholly or partially on automated processes that affect their rights.

To exercise any of these rights, the data subject may contact WCL via email at: **sistemadegestion@worldwide-cargo.com** or directly contact the department or area with which they maintain a relationship, which will channel the request in accordance with the established internal procedures.

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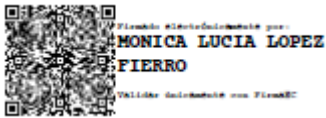
14. AMENDMENTS

WCL may update its Privacy Policy when:

- WCL changes, adds, or removes services made available to the client.
- There are changes in national legislation.
- A processed data category is created or removed, as well as the processing activities to be performed.

In the event of such changes, WCL commits to notifying the data subject to obtain their consent for the change or updated policy through the mechanisms set forth in this policy.

This policy shall be documented and communicated to all employees and relevant interested parties.

Approval Record		
Approved by	Signature	Date
MSc. Mónica López <i>Gerente General</i>		27/01/2026