



Clients Personal Data Processing Policy

CMS Grau

Clients Personal Data Processing Policy

This Clients Personal Data Processing Policy (hereinafter, the "**Policy**") makes public the guidelines under which Estudio Grau S.Civil de R.L., domiciled at Avenida Santa María No. 130, district of Miraflores, Lima (hereinafter, "**CMS Grau**"), processes the personal data of its clients, the purposes of such processing and the procedure under which the holder of the personal data may exercise the rights of access, rectification, cancellation, and opposition established in the Personal Data Protection Law - Law No. 29733 (the "**Law**") and its Regulations approved by Supreme Decree No. 003-2013-JUS (hereinafter, the "**Regulations**" and, which together with the Law shall be referred to as the "**Personal Data Protection Regulations**").

I. Scope

This Privacy Policy applies to the collection, recording, organization, conservation, consultation, use, processing, storage, and transfer by automated means; and any activity of processing of personal data (hereinafter, the "**processing**" and/or "**process**") by CMS Grau in the context of the negotiation, signing and subsequent execution of the contractual relationship with its clients.

II. General Information

CMS Grau is a company dedicated to providing legal services. As part of its activities, CMS Grau processes the personal data of clients - and their representatives or employees - in compliance with the provisions of the Personal Data Protection Regulation, and its complementary and amending regulations for the purpose of executing the services contracted with its clients. The personal data processed by CMS Grau are stored in a personal database labeled "Clients," which is the property of CMS Grau and is located at the address mentioned in the introductory section of the Policy.

III. Objective

The purpose of this Policy is to inform the public of CMS Grau's commitment to the protection of personal data, as well as the guidelines under which the processing of such data is conducted in the exercise of the firm's commercial activities, the purposes for which the personal data of clients is processed, as well as the procedures for the owners of such data to exercise their rights of access, rectification, cancellation, and opposition in accordance with the Personal Data Protection Regulations.

The personal data of clients to be processed will be names and surnames, positions, office telephone numbers, cell phone numbers, email addresses, and name of the

company the firm represents, among others that clients expressly provide to be necessary for providing the legal service contracted with CMS Grau (the "**Personal Data**").

IV. Purpose for the Processing of Personal Data and Consent

CMS Grau processes the Personal Data of clients who are natural persons for the following necessary purposes, which in accordance with Article 14 of the Law, are exempt from requesting the free, prior, express, informed, and unambiguous consent of the owners: (i) to negotiate, enter into and execute the contractual relationship that the above maintain with CMS Grau, which also includes addressing questions, claims or complaints by clients; and, (ii) to comply with other obligations arising in accordance with current and applicable legislation.

In the case of clients who are legal entities, CMS Grau will act as responsible for processing on behalf of its clients under the service contract concluded between CMS Grau and each of its clients. Therefore, the purposes in such cases will be the same as those indicated in the first paragraph of this section. Considering this, any personal data that is provided by CMS Grau's clients of their workers, representatives, licensors, personnel, or even the client's suppliers will also be subject to the provisions of this Policy under the modality of processing assignment in favor of the client, who will be responsible for the same.

Additionally, as long as the free, prior, express, informed and unequivocal consent has been granted in an additional document duly signed by the client, the Personal Data may be processed for the following purposes: advertising purposes, such as sending invitations to events and newsletters.

V. Guiding Principles

CMS Grau is committed to respecting the guiding principles in the Personal Data Protection Regulations, namely:

- a. **Principle of legality:** the processing of Personal Data is done in accordance with the provisions of the law, with the collection of Personal Data by fraudulent, unfair, or unlawful means being expressly prohibited.
- b. **The principle of consent:** the consent of the data owner must be given for the processing of personal data.
- c. **The principle of purpose:** personal data must be collected for a specific, explicit, and lawful purpose, and its use must not extend to any purpose other than that for which it was collected.

- d. **Principle of proportionality:** the processing of Personal Data must be adequate, relevant, and not exceeding the purpose for which it was collected.
- e. **The principle of quality:** the personal data to be used must be true, exact, and, as far as possible, up-to-date, necessary, pertinent, and suitable with respect to the purpose for which it was collected.
- f. **The principle of security:** the owner of the personal data bank and the person in charge of its processing must take the necessary technical, organizational, and legal measures to guarantee the security of personal data.
- g. **The principle of the disposition of appeal:** the personal data owner must have the necessary administrative or jurisdictional means to claim and enforce his rights when processing his personal data violates these.
- h. **The principle of an adequate level of protection:** for the cross-border flow of Personal Data, a sufficient level of protection must be guaranteed for the personal data to be processed or, at least, comparable to that provided for by the Personal Data Protection Act or by international standards in the matter.

VI. Rights of the Owners

In accordance with the law, the owners of Personal Data have the following rights: And other rights mentioned in the Personal Data Protection Regulations.

- a. **The right of access and information:** The owner of the Personal Data has the right to obtain the information about himself that is processed in personal data banks owned by CMS Grau.
- b. **The right of rectification, updating, and inclusion:** The owner of the Personal Data has the right to update, include, and rectify his personal data subject to processing by CMS Grau when these are partially or totally inaccurate, incomplete or when omission, error or falsehood has been detected.
- c. **Right of Cancellation or Removal:** the owner of the Personal Data may request the cancellation or removal of their personal data not related or necessary for the execution of the obligations entrusted to CMS Grau provided for in the contracts signed or those provided by current regulations.
- d. **The right of Objection:** The owner of the personal data may object to the use of his personal data at any time. The objection will proceed to the extent that its use has no contractual or legal justification.

VII. Transfer and Assignment of Personal Data

CMS Grau informs that it reserves the right to (a) transfer the Personal Data to public entities legally empowered within the scope of their powers, either at their

request, or in compliance with current or future regulations, or to private entities that are necessary for the fulfillment of the purposes described in this Policy, such as insurance companies, banking institutions, financial companies, suppliers, among others that may be necessary depending on the service contract entered into between CMS Grau and each client; and, (b) commission the processing of Personal Data to private companies, also for the fulfillment of the purposes described in this Policy, being that they must comply with the security, organizational and confidentiality measures applicable according to the Personal Data Protection Regulations. The Single Annex detailing the possible and/or potential transfers and commissions of Personal Data processing to be carried out within the framework of the present Policy, depending on the presentation of services made by CMS Grau to each of its clients, is attached to this Policy in order to report on such transfers and/or commissioning for the processing of personal data. Notwithstanding the preceding, in case the owner of the Personal Data requires the specific and updated detail of the transfers of the Personal Data made to third parties and the detail of the corresponding commissions of processing, this information shall be provided within a term no longer than five (5) calendar days, including the identification, address, and purpose for which the transfers of the Personal Data or commissions of processing were made.

VIII. Procedure for the Exercise of the Rights of The Owner Of The Personal Data

The owners of personal data whose data are subject to processing, that is, the clients, may exercise, at no cost, the rights of opposition, access to information, rectification, cancellation of their data, and revocation of their consent, without retroactive effects under the terms specified in the Personal Data Protection Regulations.

The owner of the Personal Data may exercise his rights under the Law by following the following procedure:

- Send a request, complying with the requirements detailed in Article 50º and other provisions of the Regulation, to the e-mail account: arco@cms-grau.com
- In the event that the owner of the Personal Data requires to exercise his rights through a representative, the representative must present, along with his identity document, a power of attorney legalized by a notary public empowering him as such.
- The response to such a request will be provided within the term established by law.
- In case the owner of the Personal Data requires the detail of the transfers of the Personal Data made to third parties and the the specific and updated detail

of data processors, this information shall be provided within a term not exceeding five (5) calendar days, including the identification, address, and purpose for which the transfers of the Personal Data or data processing commissions were made.

IX. Term for the Processing of Personal Data

The personal data processed by CMS Grau will be stored for as long as necessary to meet the purposes that are part of this Privacy Policy.

With regard to Personal Data that is processed for additional purposes, the duration of the processing - together with the other conditions of such further processing - will be duly informed at the time of requesting prior, express, informed, free and unambiguous consent as expressed in paragraph IV above.

X. Security of Personal Data

In compliance with current legislation, CMS Grau takes appropriate legal, organizational, and technical measures to guarantee the security of personal data, preventing its alteration, loss, improper processing, or unauthorized access.

To this end, CMS Grau makes all necessary human and technological resources available, applying them in proportion to the nature of the data stored and the risks to which they are exposed.

CMS Grau will only process personal data stored in repositories that meet the security conditions required by the current Personal Data Protection Regulations.

XI. Personal Data Officer

As of the approval date of this Client Data Processing Policy, CMS Grau has appointed **Giancarlo Villafranqui** as the Personal Data Protection Officer (PDPO), who can be contacted at oficial.datos@cms-grau.com. He is based in Peru and is responsible for the following functions:

- Informing and advising the Data Bank Holder or the Data Controller, as well as employees involved in the processing of personal data, regarding their obligations under Personal Data Regulations and other data protection provisions.

- Monitoring and reporting on compliance with Personal Data Regulations, as well as adherence to the policies of the Data Bank Holder or Data Processor regarding Personal Data Protection. This includes assigning responsibilities, raising awareness, training staff involved in processing operations, and conducting audits.
- Cooperating, as appropriate, with the National Data Protection Authority in fulfilling its objectives and responsibilities.
- Acting as the point of contact with the National Data Protection Authority on matters related to personal data processing.

The Personal Data Officer will perform their duties with due consideration of the risks associated with personal data processing operations, taking into account the nature, scope, context, and purposes of such processing.

XII. Modifications and Validity

This Privacy Policy has been updated as July, 2025, and may be revised by CMS Grau.

In the event of any change or modification of this Policy, the current text will be sent to the email address registered for such purposes.

SINGLE ANNEX

Transfers and Commissions of Processing in the Framework of the Policy of Processing of Clients' Personal Data

1. Commissions for the Processing of Personal Data

Name or Business Name	Legal Address	Identification Number and Type	Purpose(s) or Reason(s) for Processing Assignment
iManage LLC	71 South Wacker Drive, 4th Floor Chicago, IL 60606	Tax ID 47-4341604	Provision of tools and services related to cloud storage and management of documents, emails, and other organizational/corporate content for CMS Grau. Additionally, advanced security backup services are also provided within the cloud storage tool.
Bluebox Interactive LLC	Neue Mainzer Str. 2-4 60311, Frankfurt am Main, Hessen Germany	TAX ID No, 0475103525	A global platform that allows all CMS-associated firms to share business information about their clients.
Microsoft Corporation	The Source Code Compliance Team, Microsoft Corporation, One Microsoft Way, Redmond, WA 98052, Estados Unidos de América	Federal Tax ID No. 91-1144442	Provision of IT tools and applications, device optimization and security, viewers, tools, and other Microsoft Office proprietary products, such as Microsoft Word, Microsoft PowerPoint, Microsoft Teams, Microsoft Outlook Office, OneDrive, among others.
Rimac Seguros y Reaseguros	Cal. el Parque Nro. 149 Int. Piso 2, San Isidro, Lima, Perú	R.U.C. No. 20100041953	Management of health insurance policies for partners, associates, and employees. Additionally, managing and complying with labor regulations requiring mandatory insurance such as Life Insurance Law, SCTR, or Occupational Training Insurance.
Pacifico Compañía de Seguros y Reaseguros	Av. Juan de Arona Nro. 830 Otr. Centro Empresarial San Isidro, San Isidro, Lima, Perú	R.U.C. No. 20332970411	Management of health insurance policies for partners, associates, and employees. Additionally, managing and complying with labor regulations requiring mandatory insurance such as Life Insurance Law, SCTR, or Occupational Training Insurance.
AFP Integra Sociedad Anónima	Av. Canaval y Moreyra Nro. 522, San Isidro, Lima, Perú	R.U.C. No. 20157036794	Management of workers' affiliation to a Pension Fund Administrator (AFP). Collection and processing of pension contributions from payrolls.

Prima AFP Sociedad Anónima	Av. Juan de Arona Nro. 830, San Isidro, Lima, Perú	R.U.C. No. 20510398158	Management of workers' affiliation to a Pension Fund Administrator (AFP). Collection and processing of pension contributions from payrolls.
AFP Habitat Sociedad Anónima	Av. Jorge Basadre Nro. 592, San Isidro, Lima, Perú	R.U.C. No. 20551464971	Management of workers' affiliation to a Pension Fund Administrator (AFP). Collection and processing of pension contributions from payrolls.
Profuturo AFP	Cal. Coronel Andres Reyes Nro. 489, San Isidro, Lima, Perú	R.U.C. No. 20142829551	Management of workers' affiliation to a Pension Fund Administrator (AFP). Collection and processing of pension contributions from payrolls.
Banco BBVA Perú	Av. Republica de Panama Nro. 3055, San Isidro, Lima, Perú	R.U.C. No. 20100130204	Processing salary payments, employment benefits, compensations, and grants for CMS members. Management of business accounts for payments and collections. Management of financial products and corporate account administration.
Scotiabank Perú SAA	Av. Canaval y Moreyra Nro. 522, San Isidro, Lima, Perú	R.U.C. No. 20100043140	Processing salary payments, employment benefits, compensations, and grants for CMS members. Management of business accounts for payments and collections. Management of financial products and corporate account administration.
Banco de Crédito del Perú	Jr. Centenario Nro. 156, La Molina, Lima, Perú	R.U.C. No. 20100047218	Processing salary payments, employment benefits, compensations, and grants for CMS members. Management of business accounts for payments and collections. Management of financial products and corporate account administration.
OHS Occupational Health and Safety SAC	Av. Tomas Marsano Nro. 1623 Int. 303, Surquillo, Lima, Perú	R.U.C. No. 20529869585	Management of workers' occupational health to ensure compliance with labor and safety regulations.
Efectiva Salud SAC	Cal. Manuel Sebastian Ugarte y Nro. 290, San Isidro, Lima, Perú	R.U.C. No. 20554178902	Management of workers' occupational health to ensure compliance with labor and safety regulations.
Experian Perú SAC	Av. Enrique Canaval y Moreyra Nro. 480, San Isidro, Lima, Perú	R.U.C. No. 20525138985	Review of clients' creditworthiness and credit risk for CMS.
Castro Villarreal, Rosaflor Mercedes	CAL. Monseñor Luis lituma 189 URB. Pando 1ra etapa San Miguel	R.U.C. No. 10632565980	Use of personal data such as addresses and mobile numbers for sending corporate gifts.

2. Transfers of personal data at a national and international level

Name or Business Name	Legal Address	Identification Number and Type	Purpose(s) or Reason(s) for the Transfer
Superintendencia Nacional de Aduanas y Administración Tributaria - SUNAT	Avenida Garcilaso de la Vega No. 1472, distrito de Cercado de Lima, provincia y departamento de Lima - Perú	R.U.C. No. 20131312955	Compliance with information requests and/or audit processes initiated ex officio, as well as fulfillment of other applicable tax declarations and obligations for CMS Grau.
Superintendencia Nacional de Fiscalización Laboral - SUNAFIL	Avenida Salaverry No. 655, distrito de Jesus María, provincia y departamento de Lima-Perú	R.U.C. No. 20555195444	Compliance with information requests and/or audit processes initiated ex officio or due to a claim by an employee or other staff member.
Dirección de Protección de Datos Personales	Scipión Llona No. 350, distrito de Miraflores, provincia y departamento de Lima - Perú	[<u>-</u>]	Responding to information requests within the framework of personal data protection audits.
Poder Judicial del Perú	Avenida Nicolás de Piérola No. 745, distrito de Cercado de Lima, provincia y departamento de Lima - Perú	R.U.C. No. 20159981216	Responding to information requests within the framework of legal proceedings before a court.
Superintendencia Nacional de los Registros Públicos	Avenida Primera No. 1878, distro de Santiago de Surco, provincia y departamento de Lima - Perú	R.U.C. No. 20267073580	Managing or carrying out a registry procedure before this entity to obtain public registry information for a legal act.
Unidad de Inteligencia Financiera del Perú de la Superintendencia de Banca, Seguros y AFP	Calle Los Laureles Nº 214, distrito de San Isidro, provincia y departamento de Lima - Perú	R.U.C. No. 20131370564	Responding to information requests within the framework of anti-money laundering and counter-terrorism financing audits and complying with other obligations applicable to CMS Grau before this authority.
Bluebox Interactive LLC	Neue Mainzer Str. 2-4 60311, Frankfurt am Main, Hessen Germany	TAX ID No. 0475103525	A global platform that allows all CMS-associated firms to share commercial information about their clients.

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CMS locations:

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