

PRIVACY NOTICE FROM UNIBANK S.A.

Express Consent

By providing your information, you acknowledge that you have read, understood, and agreed to the processing of your data in accordance with UNIBANK S.A.'s Privacy Notice.

Privacy Notice

At UNIBANK S.A., we recognize the importance of the security, privacy, and confidentiality of our clients, users, collaborators, suppliers, shareholders, allies, and in general, all individuals we interact with. Therefore, in compliance with Law 81 on Personal Data Protection, we inform you that we will retain your personal data to which we have access and will carry out the following treatments: request, consult, collect, exchange, transfer, transmit, assign, record, register, associate, dissociate, communicate, interconnect, organize, elaborate, store, analyze, cancel, combine, block, delete, select, extract, confront, and in general, process your personal data directly or with public or private data information agencies, banks, or economic agents, allies, service providers, administrative or judicial entities when permitted by law.

Furthermore, we inform and remind you that all data subjects have ARCO rights, which include:

- a) Right to obtain information about your personal data and its processing;
- b) Right to correct and update your personal data;
- c) Right to request the deletion of incorrect, incomplete, irrelevant, outdated, or not pertinent data;
- d) Right to object to the processing of your data or to specific processing, as well as to revoke your consent, provided there are valid and legitimate reasons;
- e) Right to data portability, allowing you to obtain a copy of your personal data in standard and common formats, through the claims or requests channel.

In compliance with the Personal Data Protection laws in Panama, through this Privacy Notice, we inform you about the terms and conditions that UNIBANK S.A.

uses in the processing and protection of your personal data. We invite you to carefully read the following information:

What type of information do we collect and process?

In the context of providing our products and services and any legal, commercial, mercantile, civil, labor, regulatory, or other relationship with all individuals we interact with, UNIBANK S.A. collects personal data such as names, surnames, aliases, texts, images, photos, videos, voice, addresses, personal identification numbers, birth certificates, contact details, and sensitive data that may reveal aspects such as racial or ethnic origin, religious, philosophical and moral beliefs, union affiliation, political opinions, health data, sexual preferences, genetic or biometric data, among others.

Completely anonymous or dissociated data, which do not allow the identification of an individual, are not considered personal data.

Who is responsible for the processing of the collected personal data?

UNIBANK S.A., in accordance with Law 81 on Personal Data Protection and due to the direct or indirect relationship it maintains with you, is responsible for processing your personal data. Therefore, UNIBANK S.A. makes decisions related to the processing of the collected personal data.

What is the purpose and objective of the processing of the personal data we collect?

The personal data collected by UNIBANK S.A. may be shared or processed with its parent company, subsidiaries, service providers, public or private data information agencies, allies, administrative, tax or judicial national or international entities,

provided that the receiving country guarantees an equivalent or higher level of personal data protection, with your prior authorization through the means established by UNIBANK S.A. and in cases permitted by law, for the following purposes:

- Fraud prevention and cybersecurity management.
- Due diligence management.
- Risk assessment.
- Communication about products or services offered by UNIBANK S.A.

- Identity validation in interactions with clients or prospects, including the execution and verification of requests and operations.
- Compliance with contractual obligations.
- Administration of products or services and delivery of relevant information.
- Support in handling requests, claims, and requirements.
- Confirmation and update of your personal data.
- Business risk management.
- Compliance with legal obligations.
- Obtaining services, resources, and capabilities from third parties, including technology, networks, storage, data processing, financial services, consultancy, auditing, risk rating, among others.
- Collaboration with group companies for activities inherent to our business.
- Exercise of the rights of the entity, including administrative, judicial, and tax processes.
- Statistical purposes after dissociation or anonymization.
- Strategic transactions, including the transmission or transfer of personal data to group entities or third parties.
- Any other purpose related to the bank's corporate purpose and compatible with the aforementioned purposes.
- Commercial offers, advertising, promotion, or marketing through different media and social networks.
- Development and optimization of products, services, and channels.
- Obtaining, consulting, reporting, rectifying, modifying, and deleting credit histories in risk centers or information agencies.
- Credit analysis, economic and commercial research, statistical, reputational, and market investigations.
- Knowledge of the state of your operations and financial, commercial, and reputational behavior in other entities.

- Collection, registration, and processing of your personal data to optimize your experience and know your preferences, monitor your information, and present related content and advertising when browsing our websites, platforms, or applications.
- Sharing information with strategic allies to offer you benefits and services associated with UNIBANK S.A.'s products and services.
- Making relevant customer decisions based on automated personal data processing.
- Transfer of data to countries or jurisdictions with different data protection standards.
- Conducting satisfaction surveys about UNIBANK S.A.'s services.
- Delivering data to third parties authorized by you, in generic and common formats, through interoperable systems, when there is no other legal basis to do so.
- Sharing information with third parties, such as auditors, advisors, consultants, counterparts, allies, suppliers, rating agencies, and correspondents, in the context of transactions or provision of financial services, consultancy, or correspondence on behalf of UNIBANK S.A.
- Obtaining and processing sensitive data for all the purposes mentioned in this section.
- Sharing information with third parties at your request or that of your authorized representative.
- Purposes compatible with those mentioned above.
- Consent for the capture, collection, and use of images.

This consent can be given in writing or verbally, depending on the means of communication you use to contact UNIBANK S.A., whether physical, digital, or another means enabled by the organization.

Special conditions for the processing of sensitive data

Sensitive data is considered those that reveal aspects related to the privacy of the data subject, such as racial or ethnic origin, religious beliefs, political opinions, health data, sexual preferences, genetic or biometric data, among others.

Due to their nature, we understand that the misuse of sensitive data can result in discriminatory acts or serious risks for the data subject. Therefore, the sensitive data we collect will not be transferred, published, or displayed in whole or in part for advertising, marketing, or commercial purposes, except in the following cases:

- With your explicit authorization or when the law allows it.
- When necessary to protect your life and you cannot grant authorization.
- For the recognition, exercise, or defense of a right with judicial authorization.
- For historical, statistical, or scientific purposes, taking the necessary measures to dissociate your identity.
- In the case of minors or persons with disabilities, consent will be granted by the adult or responsible person.

What is the validity and term for the processing of your personal data?

UNIBANK S.A., according to the product or service, will retain and process your personal data in accordance with the provisions of the Anti-Money Laundering, Terrorism Financing, Proliferation of Weapons of Mass Destruction and related crimes regulations, as well as other regulations issued by the Superintendence of Banks and the Data Protection laws in Panama.

Validity and modifications to the Privacy Notice

The conditions of this notice will be applicable from its publication, with UNIBANK S.A. reserving the right to review, update, or modify them at any time. Changes will apply immediately after their publication and will be binding for all users of the website.

Your continued use of the website after the publication of the revised conditions indicates your acceptance and agreement with the changes.

Exceptions

In accordance with the legal regulations in Panama, it will not be necessary to obtain your consent in the following cases:

- For banking treatments with prior consent.
- When necessary for the application and execution of banking contracts.
- To preserve the safety of people and bank facilities.

- For the proper administration and risk management of banking operations.
- To comply with requirements or obligations of banking regulations.
- When data is shared with the owner of bank shares, subsidiaries, or other entities of the banking group for the exercise of functions inherent to the entity.
- To comply with requirements from the Superintendencia of Banks.
- When processing is based on a legitimate interest of the bank derived from the relationship or bond with you.
- For the transfer, communication, or interconnection of data to third parties for the management of the Bank-Client contractual relationship.
- Other treatments established by law and related regulations.
- The sending of advertising or marketing communication about banking products and services will require your prior, informed, and unequivocal consent.

What security mechanisms do we use to protect your data?

Learn about the security mechanisms we implement to protect your personal data at the following link:

<https://www.unibank.com.pa/es/politicas-de-privacidad-y-seguridad>

Rights of the data subject and how to exercise them

All data subjects have the right to access, rectify, cancel, oppose, and port their personal data (ARCO Rights). UNIBANK S.A. will address your requests related to the processing of your personal data free of charge and within the deadlines established by applicable laws.

Right to file claims about ARCO rights

If you believe that your ARCO rights have been violated, you can submit a request, complaint, or claim to UNIBANK S.A., by submitting the complaint about the ARCO rights form in person at our physical branches in Panama:

You can find the physical address of our branches at the following link:
<https://www.unibank.com.pa/es/oficinas>

If UNIBANK S.A. does not address your request or you are not satisfied with the response, you can file a complaint with the Superintendence of Banks. You have a period of 30 business days from the date you receive a formal response from UNIBANK S.A. or when UNIBANK S.A. has not complied with responding within the corresponding period.