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PERSONAL DATA PROTECTION POLICY
CODE: GA010034

VALIDATION PATH		
FUNCTION	POSITION	ORGANIZATIONAL UNIT
ELABORATED BY:	Head of Technology Risk	Technology Risk
REVIEWED BY:	Members of the Security Committee	Security Committee
APPROVED BY:	Members of the Security Committee	Security Committee

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1 Version Control

Current version

Version	Made by	Date	Reviewed by	Date	Approved by	Date
00	Head of Technology Risk	2021	Members of the Security Committee	2021	Members of the Security Committee	2021

Version history

Version	Effective as of	Detail of changes

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2 Goal

The performance and good results of the companies' operations depend, among other factors, on the proper processing of the data and information they handle, avoiding unauthorized leaks, modifications or eliminations that could cause damage to operations, non-compliance with regulations or reputational damage. For this reason, companies must put efforts to protect their own and other parties' information from damage that may occur while it is under the company's responsibility.

Part of the data handled corresponds to information of a personal nature, which implies certain duties for those who, without being holders or owners of this data, treat, process or store it.

A data protection policy allows collaborators to know what personal data is, to identify it, to know what the duties and rights of data holders are, thus reducing the risk of non-compliance with regulations and the possible penalties that this may entail.

This "Personal Data Privacy Policy" defines the essential criteria and guidelines for the collection, storage, use and destruction of personal data within the context outlined in the following section.

3 Scope

This Policy applies to the processing of personal data carried out internally by all companies that make up Andinas Group (Aguas Andinas S.A., Aguas Cordillera S.A., Aguas Manquehue S.A., Gestión y Servicios S.A., Análisis Ambientales S.A., Ecoriles S.A. and Aguas del Maipo S.A.) and by all companies, subsidiaries and associations in which any Andinas Group company has control (hereinafter, indistinctly, "Andinas Group" or the "Company") to comply with their contractual and legal obligations regarding (a) those data holders who are contracted by any of the companies of Andinas Group, at any organizational hierarchical level (i.e., both directors and employees,

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hereinafter referred to as "Internal Collaborators"); and those who perform work for Andinas Group, but are contracted by an external company, regardless of the way in which they are subsequently linked to the Company; or regarding suppliers that provide services to Andinas Group ("External Collaborators").; (b) those data holders who receive services or products from Andina Group; and (c) data holders who provide services or products to Aguas Group.

The guidelines established in this document apply to any member of Andinas Group who accesses and processes personal information in the course of their duties and particularly to all Collaborators in the Human Resources area regarding personal and sensitive data of Andinas Group employees.

Aguas Andinas S.A., in its role as the parent company in charge of corporate affairs and the entity in charge of making decisions regarding the objectives and means of processing personal data, will be considered the responsible for the processing, without prejudice that other entities belonging to Andinas Group, according to particular circumstances, are considered individually as co-responsible for the processing.

In those cases in which the Company does not have control or equal participation with other partners, it should be urged to adopt and implement policies and measures that contribute to protect the Company's information to the same extent as that adopted by it.

4 Definitions

Personal data.	:	This is data relating to any information concerning legal, identified and identifiable, persons.
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Identifiable person.	:	Any person who can be identified, directly or indirectly, through an identification number or one or more specific and characteristic elements of his/her physical, physiological, psychological, economic, cultural or social identity.
Data holder.	:	Legal person, identified or identifiable, to whom the personal data concern or refer.
Processing of data.	:	Any operation or complex of operations or technical procedures, whether automated or not, that allow to collect, store, record, organize, elaborate, select, extract, confront, interconnect, dissociate, communicate, assign, transfer, transmit or cancel personal data, or use them in any other way.
Responsible for processing.	:	Natural or legal person who decides on the purposes and means of the processing of personal data, regardless of whether the data are processed directly by him/her or through a third-party agent or manager.
Agent or manager.	:	Natural or legal person who carries out the processing of personal data, on behalf of responsible for data, which is materialized in an agreement or contract.
Consent.	:	Any free, specific, unequivocal and informed expression of will, by means of which the data holder, his/her legal representative or agent, as applicable, authorizes the processing of personal data concerning him/her. Consent must always be recorded, whether in writing, on a recording or other physical or technological mean.
Communication or transmission of data.	:	This is the operation by which data is transferred from one location to another, usually using technological means.
Commercially sensitive data.	:	This designation refers to data that, if disclosed, altered or unavailable, could cause damage to the organization by affecting processes or services, or expose the company to non-compliance or damage to its reputation.

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Sensitive personal data	:	Sensitive data are those personal data that refer to the physical or moral characteristics of individuals or to events or circumstances of their private life or intimacy, such as personal habits, racial origin, ideologies and political opinions, religious beliefs or convictions, physical or psychological health conditions and sexual life.
Sources accessible to the public.	:	These are repositories with personal information that can be easily accessed without having to request the consent of the person to whom the information refers. Sensitive personal data obtained from publicly available sources cannot be processed without the consent of the owner.
ARCO Rights.	:	Correspond to the rights of Access, Rectification, Cancellation and Opposition, which the personal data holders have and can be exercised before any person, natural or legal, who is processing their personal data.

5 Principles

The processing of personal data within the Company is governed by the following principles:

- **Principle of legality of processing.** It refers to the fact that personal data may only be processed subject to the law, i.e. in compliance with the regulations governing the processing of personal data and, in particular, Law No. 19,628, on the Protection of Privacy (hereinafter, indistinctly "Law No. 19,628", "Personal Data Law", or "LPD").
- **Principle of purpose.** It implies that personal data must be collected and processed for specific, explicit and lawful purposes, and may not be processed for purposes other than those informed at the time of collection.
- **Principle of proportionality.** Only the data necessary for the fulfillment of the purposes for which they were collected will be requested and processed, and for the time strictly necessary to comply with that purpose. At the end of this period and in

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the absence of any other legitimate interest by the Company, the data must be destroyed.

- **Principle of quality.** The data must be accurate, complete and current, regarding the purposes of the processing. The Company, as the responsible for the data, shall take reasonable measures to ensure that personal data that is inaccurate, incomplete or outdated is deleted or rectified.
- **Principle of responsibility.** Those who process personal data, whether as responsible or manager, must comply with the principles, duties and obligations established by law.
- **Principle of security.** The Company, as the responsible for the processing of personal data, must adopt technical and organizational measures appropriate to the risks presented by the processing, protecting the data against unauthorized processing, loss, leakage, damage or destruction.
- **Principle of transparency and information.** Personal data policies and practices must be permanently available, clearly, unequivocally and free of charge. Also, the owner of the data must be provided with access to all information regarding its processing in accordance with the law.
- **Principle of confidentiality.** This refers to the duty of reserve of the person responsible for personal data and those who have access to them, regarding the personal data to which he/she has access. This duty subsists even after the relationship with the owner has ended.
- **Principle of temporality.** It refers to the duty to preserve personal data only for the reasonable and necessary time to fulfill the purpose of the processing, contractual obligations, legal requirements or instructions from the supervisory and control authorities or other competent authorities.

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6 Roles and Responsibilities

General Management

- To exercise leadership and commitment to ensure the improvement of processes in relation to the protection of personal data.
- To validate the personal data management process. To sanction the strategies and control mechanisms for the treatment of risks affecting personal data, generated as a result of the reports or proposals of the Security Committee.

Security Committee

- To verify the implementation of procedures and standards that refer to the protection of personal data.
- To propose specific strategies and solutions for the implementation of the controls required by this Policy.
- To require and maintain information regarding the level of protection of personal data.
- To report to the General Management, regarding opportunities for improvement in terms of personal data protection, as well as relevant incidents and its solution.

Data Protection Officer (DPO)

- To organize the activities of the Security Committee regarding the processing of personal data.
- Develop and keep updated the Personal Data Privacy Policy, control its implementation and ensure its correct application, in coordination with the Compliance Officer of Aguas Group.
- To supervise the overall progress of the implementation of strategies for the control and treatment of risks related to personal data.

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- To coordinate with other areas or units the actions for the protection of personal data, such as the evaluation of the company's risks in this area, the inclusion of these risks in a risk matrix, and the management of the controls and action plans that are incorporated into the risk matrix.
- To represent the organization before customers, suppliers and other external entities, in relation to the protection of personal data. To be in charge of managing the response given by the Company to the holders of personal data who exercise their ARCO rights before any of the companies of Andinas Group.
- To process complaints about violations of personal data regulations that enter Andinas Group's complaints channel.

7 Guidelines

The management and processing of personal data shall be governed in any case under the following general guidelines:

7.1 Processing of Personal Data of the holders of personal data

The following obligations and criteria are established:

1. In compliance with Law No. 19,628, the processing of personal data will be understood in accordance with the definition of the concept incorporated in section No. 4 of this Policy. The processing of data considers the use of data in any form and, therefore, the actions or operations described in the definition are stated in merely exemplary terms and each of them individually constitutes a processing of personal data.
2. According to Article 4 of Law No. 19,628, personal data may only be processed when authorized by law or with the express consent of the owner. Such authorization must be in writing.

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3. In the case of Internal Collaborators, relative information necessary for regulatory compliance is requested. In the case of External Collaborators, only their name, Tax ID, address and those data necessary to comply with their legal obligations may be requested.
4. In the case of data holders who receive services or products from Andinas Group, information is requested in order to comply with legal obligations.
5. In the case of data holders who provide services or products to Andinas Group, information is requested in order to comply with their legal obligations.
6. Andinas Group collects personal information from its Collaborators, whether internal or external, to comply with its legal obligations in labor, social security and tax matters, as well as to execute the contract concluded between the parties (for example, through the payment of remuneration or consideration). When the data is collected for another reason, Aguas Andinas will always require the consent of the owner. Notwithstanding the foregoing, there are some cases in which authorization for the processing of personal data is not necessary:
 - When the information is requested by a legal requirement, by court order or by a public authority;
 - If the data are of a public nature;
 - In all cases in which it is necessary to ensure national security or the public interest.
7. Andinas Group declares that the processing of personal data is in accordance with the principle of purpose, i.e. the data will be used only for the purposes stated above. In case it is required to use the data for a different purpose, not related to the original one, Andinas Group will contact the owner of the data informing the new purpose for which its personal data will be used and will request his/her express consent.
8. The personal data of Internal or External Collaborators that are processed by the Company, will be only those strictly necessary for the fulfillment of the purposes for which they were collected, among which are, without being restrictive, payroll payment, benefits, vacations, licenses , among others. In compliance with the

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principle of proportionality, any other data that is not necessary for the fulfillment of these purposes or others that have been informed at the time of obtaining the personal data, should not be processed by the Company and should be deleted.

9. The personal data of other data holders (e.g. customers, suppliers, directors, etc.) that are processed by the Company will be only those strictly necessary for the fulfillment of the purposes for which they were collected. In compliance with the principle of proportionality, any other data that is not necessary for the fulfillment of these purposes or others that have been informed at the time of obtaining the personal data, should not be processed by the Company and should be deleted.
10. Andinas Group guarantees compliance with Law No. 19,628, so the personal data to which it has access will become part of a database belonging to Andinas Group and will be used solely and exclusively for the purposes for which they were provided. Likewise, Andinas Group adopts the necessary security measures to guarantee the privacy and protection of the holder's data.
11. The personal data of the Collaborators shall be kept for the time necessary to fulfill the contractual and labor obligations, i.e., as long as the owner of the data remains as a Collaborator of the Company or, in case of being an External Collaborator, while he/she is providing services for Andinas Group.
12. In the event of termination of the labor or contractual relationship, the data of former collaborators shall be stored only for the time necessary to comply with the corresponding contractual, labor, social security and/or tax obligations. Thus, the maximum period for maintaining the personal data of former collaborators within the system is five years. Once this period has elapsed, the personal data must be deleted. Only when the Collaborator has been dismissed for committing a crime punishable by a felony, his/her information may be kept in the system for a maximum period of ten years.
13. The personal data of other data holders shall be deleted as soon as the purpose for which they were used is concluded, or within 5 years from their last use. Anyway,

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the Data Protection Officer shall periodically carry out data cleansing processes of Andinas Group's systems.

7.2 Data Holders Rights

1. **Right of access.** Data holders may request from the Company, as responsible for the processing, information on the data relating to their person, their origin and recipient, the purpose of the processing and the individualization of the persons or bodies to whom their data are regularly transmitted. This right also entitles data holders to demand and obtain a copy of personal data in a structured format, commonly used and machine-readable, free of charge. In the event of modifications or eliminations of data, the holder may also obtain a copy of the updated record free of charge, provided that at least six months have elapsed since the last time he/she made use of this right. The right to obtain a copy free of charge may only be exercised in person.
2. **Right of rectification.** The holders of personal data may require the Company, as responsible for the processing of data, to modify them when they contain errors, are inaccurate, misunderstandings or incomplete.
3. **Right of cancellation.** The holders of personal data may request the Company to delete their personal data in the event that its storage lacks legal basis or when they are outdated. Likewise, they may request the elimination or blocking of their personal data, when they have provided them voluntarily or when they are used for commercial communications and do not wish to continue to be listed in the respective registry, either definitively or temporarily.
4. **Right of opposition.** Personal data holders may request the Company, as responsible for the processing, to stop or restrict the processing of personal data in certain cases permitted by law.

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Collaborators wishing to exercise the aforementioned rights, whether internal or external, should send an e-mail to the Data Protection Officer at ProtecciondeDatos@andinas.cl.

When exercising the aforementioned rights, the Company must respond to the request within a period of 2 business days, otherwise, the holder of the personal data may appeal to the courts in accordance with the provisions of Article 16 of Law No. 19,628.

7.3 Identification of Data Protection Officers

1. The Data Protection Officer must coordinate and enforce compliance with data protection regulations, ensuring that no violations are committed in this area. Likewise, the Data Protection Officer is in charge of coordinating and controlling the security measures regarding the personal information stored and processed in the information systems, in order to prevent information leaks, loss or improper modification of data, among other risk circumstances.

7.4 Documentation Regarding Personal Data Protection

Andinas Group will develop adequate and sufficient documentation regarding the technical and organizational means for the establishment of measures for the protection of personal data. In this regard, Andinas Group:

- I. Will develop the corresponding documentation (manuals, procedures or other approved documentation) and keep it duly updated.
- II. Will strictly comply with the provisions of said documentation.
- III. Will disseminate this documentation among employees, suppliers, etc., who access personal data, highlighting the obligations and rights arising from these regulations.

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7.5 Clauses in Contracts with Third-Party Agents

Andinas Group shares the personal data of its Collaborators, customers and suppliers with third parties in order to manage the fulfillment of the purposes by which it collects its data (the "Third-Party Agents"). For example, it centralizes collaborators' personal information in a software called sap in order to carry out its legal obligations for the payment of remunerations.

When agreeing on services with third parties that require or imply the processing of personal data, Andinas Group will define its own and the third party's obligations regarding this processing.

These obligations, which will be included in the respective contract, will consider:

- I. That the Third-Party Agent will act under the written instructions of the Company and will process the personal data in accordance with the instructions and purposes for which they were obtained.
- II. That it will not communicate them to third parties, unless expressly authorized by the Company and only for the fulfillment of the assignment entrusted to the Third-Party Agent.
- III. That it will develop and implement the technical and organizational measures that may be necessary according to the characteristics of the contract concluded with the Company, in order to maintain a high standard of security in the processing of personal data.
- IV. That the Third-Party Agents must concluded a confidentiality and safeguard agreement for the personal data that will be delivered to them, and the delivery cannot be made without the execution of such agreement.
- V. That, once the contractual relationship and thus the assignment is terminated, the data must be destroyed or returned to the entity.

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- VI. The Company requires Third-Party Agents to subscribe to and respect this Policy. Andinas Group will develop and keep updated an inventory of contracts of those entities (third parties) that provide services related to the processing of personal data. Collaborators, whether internal or external, may request a list of all Third-Party Agents by sending an e-mail to the Data Protection Officer at the following e-mail address: protecciondedatos@andinas.cl.

7.6 Security Measures Regarding the Information of the Individuals

Andinas Group will have adequate security mechanisms, record of incidents and backup of personal data. In particular:

- I. It will maintain a registry of access profiles and users with access to applications or systems that process personal data.
- II. It will periodically review the access profiles and users with access to personal data, either in whole or in part and on a permanent or intermittent basis.
- III. It will have an updated incident log (which may or may not be automated) recording the loss, alteration or destruction of personal data or devices that store personal data.
- IV. It will take the necessary corrective actions to respond to and mitigate the effect of detected incidents, including immediately notifying affected customers and data holders who have been compromised, as applicable.
- V. It will maintain an update inventory of files, repositories and databases of which must be backed up.
- VI. It will conduct prompt backups of the inventory of files, repositories and databases.

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8 Flow Chart

N/A

9 Appendix

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