

Privacy Notice

1. Purpose

This privacy notice on personal data processing (hereinafter, the “**Privacy Notice**”), is aimed at informing how CIRION, whose ID details as well as the domicile for service of process may be verified according to the country where you are located (see Annex 1), conducts the processing of the personal data it collects through its webpage www.ciriontechnologies.com (hereinafter, the “**Webpage**”) in its capacity as controller. This data is collected by navigating and using the Webpage, filling virtual forms, and through different spaces on the Webpage for entering personal data virtually. Additionally, this Privacy Notice shall apply to other data collection channels when so informed thereby to the personal data subjects.

For these purposes, “**Subject**” shall refer to the person whose data is collected and processed pursuant to the terms of the Privacy Notice. Only personal data for which due consent has been obtained is processed, or data subject to other permissive conditions for their processing, as established in the applicable country's legislation.

2. Regulatory Framework

This Privacy Notice is governed by the applicable country's legislation, in particular, when reference is made to “**your country's jurisdiction,**” the “**applicable regulation,**” or “**your country's current legislation**”, it shall be understood as the regulation listed as Annex 2 to this Privacy Notice.

3. Retention Period

The personal data provided by the Subject shall be retained as long as necessary to fulfill the purpose for which it was collected and while the Subject has not revoked their consent, pursuant to your country's applicable legislation.

Upon fulfillment of said purpose, your personal data may continue to be processed by us for the reasons indicated below:

- If there exists a statutory or contractual obligation on their retention.
- If necessary for research purposes, for auditing purposes, and/or for the regular exercise of our rights in judicial, administrative, or arbitration proceedings.

4. Personal Database

The personal data provided by the subject shall be stored, pursuant to your legislation's requirements, in a personal database owned by CIRION, duly registered in the Registry of your country (where applicable).

5. Collected Data and Purposes

CIRION collects personal data of an identifying nature and contact personal data, such as Name, Last name, Country, Company, Corporate e-mail, Telephone Number, Title, Area.

This personal data provided by the Subject is necessary to request a meeting with our experts, to be contacted to receive information about CIRION's services, and to receive quotations, and, where applicable, for CIRION's service provision. These purposes are necessary for the legal relationship between CIRION and the Subject, and if Subject fail to provide this data or provide wrong or inaccurate data, CIRION will not be able to fulfill these purposes.

Additionally, with the valid consent of the Subject, which may be revoked at any time, CIRION may contact them via e-mail to send them notifications, surveys, information about events and solutions, and/or advertising of the products and/or services offered by CIRION.

CIRION reserves the right to make any type of automated decisions regarding their personal data, pursuant to your country's current legislation.

6. Transfer, Transmission, and Recipients

By accepting this Privacy Notice, the Subject authorizes their personal data to be shared with service providers, who may be located in countries other than the Subject's country and that enable the fulfillment of the purposes described in this Privacy Notice, or with third parties with whom CIRION has an obligation regarding information transfer.

If you do not want your personal data to be transferred, please send an e-mail to: privacy.latam@ciriontechnologies.com. The admissibility of the objections to data transfer shall be assessed on a case-by-case basis.

In order to safeguard your privacy, we use contracts to guarantee that the third parties receiving your personal data in our name provide the same level of protection as we do.

Whenever there is an international transfer of personal data under our responsibility, we make sure that said transfer is made only to countries that offer a similar level of protection to the one provided by the laws of the territories where we operate, or that these transfers have been authorized by the subject and/or their data protection authorities, pursuant to your country's legislation.

7. Security Measures

CIRION adopts the necessary security measures to guarantee the protection of the Subject's information in order to avoid unauthorized or illegal alteration, loss, destruction, damage, processing, disclosure thereof, and/or access thereto, taking into consideration the nature of the information and the risks the data is exposed to. To protect the Subject's personal data, measures have been put in place, which at least imply the following:

- Control and registration of accesses and privileges, as well as verification thereof from time to time.
- Record of events, logical interactions.
- User identification and authentication through password use and management.
- Information copies and backups in a controlled and authorized manner.
- Security in personal data processing environments.

8. Confidentiality

CIRION agrees not to disclose or share the personal data provided by the Subject without their consent, except for the following cases:

- When necessary for the purpose for which the information was collected.
- When the Information subject is duly notified before the disclosure or at the time of collection of the Information, and their previous and express consent is obtained.
- When consent is not a requirement pursuant to your country's legislation.
- When the Information is required by public entities within their area of competence and in the exercise of their duties and powers.
- When the Information is requested by virtue of court orders or legal provisions.
- When it comes to access to Information by auditors, lawyers, and other professionals in exercise of their duties, who are subject to keep professional secrecy.
- In any other cases provided for and authorized by your country's legislation.

If otherwise stated by your country's jurisdiction in regard to these events, CIRION shall comply with the provisions set forth in said legislation.

9. Use of Cookies on the Webpage

Cookies are small text files from websites that are stored in your computer, smartphone, tablet, or any other Internet access device, in order to collect some specific information on your navigation experience and your preferences. Cookies cannot damage your computer or device, and they are very useful as they help us identify and resolve errors.

The Webpage uses its own cookies and third-party cookies, which may be classified as follows and for the following purposes:

- Preference cookies: These cookies enable the webpage to remember information that changes the way it behaves or looks, such as your preferred language or the region that you are located in.
- Statistical cookies: These cookies help website owners understand how visitors interact with webpages by collecting and providing information anonymously.
- Marketing cookies: These cookies are used for tracking webpage visitors. They are aimed at displaying relevant adds that are appealing to the individual user, and therefore, more valuable for editors and third-party advertisers.
- Targeting cookies: These cookies are established by our advertising partners. These companies may use a profile of your interest and display relevant adds in other websites. They exclusively identify your browser and your Internet device.
- Performance cookies: These allow for counting visits and traffic sources in order to measure and improve our website performance. They help us know which webpages are the most and the least popular, and see how visitors navigate the website. All the information collected by these cookies is aggregated.
- Functional cookies: These cookies enable the website to offer improved functionality and customization. They may be established by CIRION or by third-party service providers whose services we have added to our webpages.
- Necessary cookies: These cookies help us build a usable webpage by activating basic features like webpage navigation and access to webpage safe areas. The webpage cannot work properly without these cookies.

You may accept or reject the use of cookies that are not necessary through the message regarding cookies displayed when you visit the Webpage for the first time. If you accept third-party cookies, you can delete them, if you wish to do so, directly through the cookie management options of your browser.

Additionally, you may allow, block, or delete the cookies installed in your computer or device through the cookie settings of the browser installed in your computer or device.

However, please note that the use of cookies enables us to provide you with a better experience concerning the use of our services. If you change the cookie settings, your navigation experience may not be optimal.

10. Exercise of Rights

The Subject may exercise the right of processing confirmation, access to, rectification, correction of incomplete, inaccurate, or outdated data, opposition, cancellation, anonymization, blocking or deletion of unnecessary or excessive data, revocation, portability, information on the processing, suppression, deletion, updating, inclusion, annulment, limitation of the processing, the right not to be subject to decisions made only based on automated assessments, the right of limitation of use, disclosure of personal data, and further rights enshrined in the applicable law, through a request that may be addressed to the following e-mail address: privacy.latam@ciriontechnologies.com. Additionally, Subjects may exercise their rights in person at the addresses set out in Annex No. 1 to this Privacy Notice.

CIRION shall have a simple and free procedure in place for addressing the rights of Information subjects pursuant to the provisions set forth in your country's legislation.

Notwithstanding the foregoing, CIRION may retain some specific information of the Subject requesting cancellation, to be used as evidence in the event of a potential claim. The retention term shall not exceed the statute of limitations of said responsibilities pursuant to law. If any information on the user's logical interactions with the Webpage cannot be deleted due to technical limitations, this data shall be anonymized so it cannot be used to identify the Subject or to make them identifiable.

11. Personal Data Portability

Upon express request of the Subject, CIRION may return the personal data collected on them, in a compatible, updated, structured, common, interoperable, and mechanical-reading format, preserving its characteristics, or it may deliver it to a person duly appointed by the Subject for said purpose.

CIRION will make this transfer or communication in an economically and financially efficient, expeditious, and smooth manner.

Subject's data portability will not apply for information inferred, created, generated, obtained, or resulting from any analysis or processing conducted by CIRION.

12. Personal Data Protection Delegate

CIRION has appointed an individual responsible for the fulfillment of the personal data protection policies adopted for each one of the jurisdictions where it operates. For more information on this appointment, please visit the company's website or send an e-mail to privacy.latam@ciriontechnologies.com

13. Changes to the Privacy Notice

CIRION may modify, update, or supplement the Privacy Notice at any time. Any modification, update, or addition in regard to this notice shall be immediately communicated through the Webpage, and through any other channels that may be determined, requesting the approval of the new conditions where applicable.

Last update date: June, 21 of 2022

Annex 1

Who are we in your country?

Country	Name	Address	Tax ID	Contact details
Argentina	CenturyLink Argentina S.A.	Alférez Pareja 256, Buenos Aires	30-62674717-1	Email: Contacto.AR@Ciriontechnologies.com
Uruguay	CenturyLink Argentina S.A., Sucursal Uruguay	Juncal 1392	214789730017	Email: Contacto.AR@Ciriontechnologies.com
Chile	CenturyLink Chile S.A.	Av. Kennedy 5735 oficina 802 Edificio Marriott Torre Poniente, Los Condes, Santiago de Chile	96.896.440-2	Email: Contacto.CL@Ciriontechnologies.com
Peru	CenturyLink Perú S.A.	Avenida Manuel Olguin 395, Urb. Los Granados, Santiago de Surco, Lima, Peru.	20252575457	Email: Contacto.PE@Ciriontechnologies.com
Ecuador	CenturyLinkEcuador S.A.	Calle Juan Diaz Nro. 37-111, Urbanización Iñaquito, Alto Quito, Ecuador	1791252322001 (RUC)	Email: Contacto.EC@Ciriontechnologies.com
Venezuela	CenturyLink Telecomunicaciones S.A.	Calle 7, Zona 1, Manzana B-2 Sector Sur, Edificio Impsat, La Urbina, Caracas, Venezuela.	J-30046239-0	Email: Contacto.VE@Ciriontechnologies.com
Colombia	CenturyLink Colombia S.A.S	185 st. N° 45 – 03, C.C. Santafé, Corporate Tower, 5th floor, City of Bogotá.	800.136.835-1	Email: Contacto.CO@Ciriontechnologies.com
Brazil	CenturyLink Comunicações do Brasil Ltda.	Av. Eid Mansur, 666, Parque São George, Cotia, São Paulo.	72.843.212/0001-41	Email: Contato.BR@Ciriontechnologies.com

Country	Name	Address	Tax ID	Contact details
Brazil	CenturyLink Participações e Comercial Ltda.	Av. Eid Mansur, 666, Parque São George, Cotia, São Paulo	03.357.424/0001-04	Email: Contato.BR@Ciriontechnologies.com
Brazil	CenturyLink Brasil Comunicações e Serviços Ltda.	Av. Eid Mansur, 666, Parque São George, Cotia, São Paulo	03.427.524/0001-51	Email: Contato.BR@Ciriontechnologies.com
Brazil	Lumen Holding Brasil Ltda.	Av. Pedro II, 329, São Cristovão, Rio de Janeiro, Rio de Janeiro	03.401.849/0001-65	Email: Contato.BR@Ciriontechnologies.com
Mexico	CTL México II S. de R.L. de C.V.	Lago Zúrich Nro. 96, Col. Ampliación Granada, Miguel Hidalgo, México DF.	GCM041215ET7	Email: Contacto.MX@Ciriontechnologies.com
Mexico	CTL México Landing, S. de R.L.	Lago Zúrich Nro. 96, Col. Ampliación Granada, Miguel Hidalgo, México DF.	GCL990526IY8	Email: Contacto.MX@Ciriontechnologies.com
Mexico	CTL México Servicios, S. de R.L. de C.V.	Lago Zúrich Nro. 96, Col. Ampliación Granada, Miguel Hidalgo, México DF.	GCS990824ST5	Email: Contacto.MX@Ciriontechnologies.com
Panama	CenturyLink Panamá Inc.	Avenida Arnulfo Arias y Calle Ramón Levy Balboa, Edificio Nro. 851. Panama City, Panama.	94331-1-377666	Email: Contacto.CA@Ciriontechnologies.com
Costa Rica	CenturyLink Costa Rica S.R.L.	Provincia de San Jose, Canton Escazú, distrito Guachipelin de la entrada a desnivel de Multiplaza 800mts norte VMG Business Center, Oficina 13	3-102-370195	Email: Contacto.CA@Ciriontechnologies.com

Annex 2

Applicable law

Country	Applicable regulations
Argentina	Law No. 25,326: Law on personal data protection.
Brazil	Law No. 13,709/2018: General law on personal data protection.
Chile	Law No. 19,628: Law on private life protection.
Colombia	Law No. 1581 of 2012: Law on personal data protection and its Regulatory Order No. 1377 of 2013.
Costa Rica	Law No. 8968: Law on protection of the person regarding the processing of their personal data, and its regulations.
Ecuador	Official Register Supplement No. 459: Organic law on personal data protection.
Mexico	Federal law on the protection of personal data held by private companies or individuals.
Panama	Law No. 81 of 2019: Law on personal data protection, and its regulations.
Peru	Law No. 29733: Law on personal data protection and its regulations, approved by Supreme Order No. 003-2013-JUS.
Uruguay	Law No. 18,331: Law on personal data protection and “habeas data” action; Regulatory Order No. 414/009; Law No. 19,670; and Regulatory Order No. 64/020.
Venezuela	Constitution of the Bolivarian Republic of Venezuela.