**PRIVACY POLICY**

**Update: June 2022**

**1. INTRODUCTION.**

**CETCO S.A.**, hereinafter "**THE COMPANY**", administrator of the website www.hackathonbelcorp.com (hereinafter, "the Website"), is committed to respecting the privacy of its customers and protecting the confidentiality of their private information and personal data. Therefore, aware of the high regard of your privacy and of all those who are interested in our products, we comply with the provisions for the treatment of your personal data established in the Ley de Protección de Datos Personales - Ley N° 29733 and its Regulations, approved by Decreto Supremo No. 003-2013-JUS and the guidelines of the Autoridad Nacional de Protección de Datos Personales (hereinafter, the “Personal Data Protection Regulations”).

**2. PROTECTION OF PERSONAL DATA**

1. **IDENTITY AND ADDRESS OF THE OWNER OF THE PERSONAL DATA BANK:**

The owner of the data bank in which the personal data provided by the Users (hereinafter, the “Personal Data”) on the Website will be stored is CETCO S.A., with address at Av. Felipe Pardo y Aliaga No. 652, Int 1201, district of San Isidro, province and department of Lima. Said personal data bank will be declared before the National Authority for the Protection of Personal Data, by means of its registration in the Registro Nacional de Protección de Datos Personales with the name "Clientes" with the code RNPDP-PJP No. 6613.

1. **PURPOSE OF THE TREATMENT:**

The processing of Personal Data will be carried out in accordance to the Peruvian current legislation on the matter of personal data protection (Ley N ° 29733 - Ley de Protección de Datos Personales; its Regulations, approved by Decreto Supremo N ° 003-2013- JUS and the criteria of the Autoridad Nacional de Protección de Datos Personales).

Once the User provides their free, prior, informed and express consent, **THE COMPANY** will process the Personal Data for the following authorized purposes:

* Process the requests for registration and/or subscription of the Users, provide support to the User, validate the veracity of the information provided and answer User inquiries.
* Manage the commercial relationship.
* Send promotions and/or advertising, if authorized by the User, linked to the Website and / or the promotion of the Brands.
* Invite the User to participate in commercial promotions, and if he does participate, inform him about the award winners. The Users who participate in the mentioned promotions, contests or raffles, expressly authorize the Brands and/or **THE COMPANY** and/or any of its affiliated companies (detailed in the Annex of this document) responsible for the free promotion spread and by the means it deems appropriate, the Personal Data of the Users who are winners, including their names, image and testimony.
* Use the Personal Data of the Users to manage and operate their accounts on the Website for commercial purposes, remarketing actions, market studies, statistical and historical purposes and in general, any purpose for the commercialization of their products and/or the provision of their services.
* Supervise, monitor and moderate the behavior and activity of Users in the sections in which Users can create or generate content, such as sections for inquiries, comments, blogs and/or forum conversations.
* Carry out internal studies on the interests, satisfaction, behaviors and habits of conduct of the Users in order to enrich and complement the information of the Users and thus offer the Users a better product/service in accordance with their specific needs. This will allow Users to receive personalized content based on their interests, either through the Website, or through other digital and/or non-electronic means.

The processing of Personal Data that **THE COMPANY** will carry out consists of collecting, registering, organizing, storing, consulting, extracting and using Personal Data for the purposes of managing the business relationship with Users.

Personal Data will only be used for limited purposes, such as those set out above.

1. **TRANSFERS AND RECIPIENTS:**

**THE COMPANY** may transfer the Personal Data registered on the Website to third parties in order to carry out the commercial relationship between the Parties, as detailed in clause 2, literal b) of this Privacy Policy. Said third parties may be: affiliated companies, banking and financial entities, transportation, distribution, billing, call center, technology and/or state authorities, if applicable by law.

Likewise, the personal data will be transferred internationally to the United States of America to the company SAP Peru SA, with address at Av. Circunvalación Golf los Incas No. 154, Office 1601, Lima, Peru, and / or to the company Amazon Web Services (AWS) with address at 410 Terry Avenue North, Seattle, WA 98109-5210, in order to store data securely in the cloud of these companies.

1. **EXERCISE OF THE RIGHTS OF INFORMATION, ACCESS, RECTIFICATION, CANCELLATION AND OPPOSITION OF PERSONAL DATA:**

As the owner of the Personal Data, Users have the right to access to the Personal Data that are processed by **THE COMPANY**, know the characteristics of their treatment, rectify them if they are inaccurate or incomplete; request that they be deleted or canceled as they are considered unnecessary for the previously stated purposes or oppose their treatment for specific purposes.

Users at any time may revoke the consent expressly granted, as well as limit the use or disclosure of their personal data, subject to the consequences that this implies, in accordance with the provisions of paragraph b. of clause 2.

Users may direct their request to exercise their rights at the following address: Av. Felipe Pardo y Aliaga No. 652, Int. 1201, district of San Isidro, province and department of Lima and / or to the following address: [hackathon@belcorp.biz](mailto:hackathon@belcorp.biz)

In this sense, they must submit -at the address previously specified - the respective request, according to what is indicated in the Procedure for the Exercise of ARCO Rights found within the legal documents section of the Website, in the terms established the Regulation of the Ley N.º 29733 – Ley de Protección de Datos Personales (including: name of the owner of the personal data and their address or other means to receive a response; documents that prove their identity or the corresponding legal representation; clear and precise description of the data with respect to which you seek to exercise your rights and other elements or documents that facilitate the location of the data).

If the Users consider that their corresponding request has not been attended to in the exercise of their rights, they can file a claim with the Autoridad Nacional de Protección de Datos Personales, by addressing the Mesa de Partes of the Ministerio de Justicia y Derechos Humanos of Peru.

**THE COMPANY** will be responsible for the personal data bank called "Clientes" registered with the code RNPDP-PJP No. 6613 and for the Personal Data contained therein. In order to avoid the loss, misuse, alteration, unauthorized access and theft of Personal Data or confidential information provided by the User, **THE COMPANY** has adopted the legally required levels of security and protection of personal data and has installed all the means and technical measures at its disposal.

**3. SECURITY OF PERSONAL DATA AND CONFIDENTIALITY**

**THE COMPANY** has implemented all the necessary technical and organizational measures to guarantee the security of Personal Data and avoid its alteration, loss and unauthorized treatment and/or access, taking into account the state of technology, the nature of the data. stored and the risks to which they are exposed. The Personal Data provided by the Users will be treated with complete confidentiality.

**THE COMPANY** undertakes to keep professional secrecy indefinitely regarding these and guarantees the duty to keep them by adopting all the necessary security measures.

**4. PROPORTIONALITY OF THE PROCESSING OF PERSONAL DATA**

The Personal Data requested from Users are adequate, pertinent and not excessive in relation to the purpose for which they are collected. However, they will be kept for as long as some type of responsibility may be required from **THE COMPANY** derived from this relationship with the Users. Therefore, the Personal Data of the Users will be treated by **THE COMPANY** for as long as the commercial relationship with the User is maintained, namely, it may be unlimited except in cases in which the User exercises the right to cancellation and / or the purpose of the treatment has been fulfilled.

**5. MODIFICATIONS TO THE PRIVACY POLICY**

**THE COMPANY** reserves the right to modify this Privacy Policy at any time. Any modification will be immediately communicated to the Users through the update of this Privacy Policy and will have effects against related third parties from its publication in the legal documents section of the Website.

For better clarity regarding to the validity of this document, Users can find the latest update date of the applicable Privacy Policy at the top of it.

**6. CONSENT**

By accepting this Privacy Policy, Users agree with all the aspects set out in this document and authorize us to process their Personal Data for the purposes set out above.

**Annex**

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| **Company** | **Country of incorporation** | **Identification** | **Address** |
| Cetco S.A. | Perú | RUC: 20100123763 | Av. Pardo y Aliaga N.º 652, interior 1201, San Isidro, Lima, Perú. |
| Belcorp SA Sucursal del Perú | Perú | RUC: 20601050120 | Av. Pardo y Aliaga N.º 652, interior 601-1201, San Isidro, Lima, Perú. |
| Promotora de Belleza S.A. | Chile | RUT: 96.524.830-7 | Av. Aeropuerto N.º 860, Quilicura, Santiago, Chile. |
| Transbel S.A. | Bolivia | NIT: 1028501021 | Cuarto Anillo entre Av. Paraguá y Mutualista S/N, Edificio “ITA”, Santa Cruz de la Sierra, Bolivia. |
| Bel Star S.A. | Colombia | NIT. 8000183591 | Km. 22 Carretera Central del Norte, Parque Industrial Canavita, Vereda Canavita, Tocancipá, Cundinamarca, Colombia |
| Grupo Transbel S.A. | Ecuador | RUC: 1791868951001 | Inglaterra E3-266 y Avenida Amazonas, esquina Edificio Stratta, Piso 5 y 6, ciudad de Quito, Distrito Metropolitano, Provincia de Pichincha, Quito, Ecuador |
| Transbel S.A. de C.V. | México | RFC: TRA950227PX7 | Rancho San Javier Carretera México Querétaro Km. 41.5, SN, Nave 6 lote 2 y 3, Ex-Hacienda San Miguel, Cuautitlán Izcalli, México, CP 54715. |
| Dirbel Inversiones S.A. | Costa Rica | Cedula de Persona Jurídica No. 3-101-338816 | Centro Corporativo Plaza Roble, Edificio Las Terrazas, 3er Piso, San Rafael, Guachipelín de Escazú, San José, Costa Rica |
| L´Bel Paris S.A. | Panamá | 1178871-1-577745 Dígito Verificador (DV) 80 | Oceanía Business Plaza, Punta Pacifica, Torre 1000 Piso 25 Local G, Ciudad de Panamá, Panamá. |
| Belcorp International Operations S.A. | Panamá | 155700835BIO | Costa del Este Edificio Dream Plaza Piso 8 Corregimiento Juan Díaz, Distrito y Provincia de Panamá |
| Belcorp Guatemala S.A. | Guatemala | NIT: 2648984-8 | 5a. Av. 5-55 Zona 14, Edificio Europlaza, Torre 1, Nivel 15, Of. 1501, Ciudad de Guatemala, Guatemala |
| Belcorp El Salvador S.A. de C.V. | El Salvador | NIT: 0614-060203 -1045 | Local 3, Ctro. Com. La Gran Vía, Edificio 6, Nivel 1 No. 23 y 29, Centro de Negocios La Gran Vía, Antiguo Cuscatlán, La Libertad El Salvador |
| Ventura Corporation Limited (Sucursal) | Puerto Rico | 66-0584328 | Monte Hiedra Office Center. Av. Los Romeros 9615, Suite 501, San Juan, Puerto Rico. |
| Transbel SRL | República Dominicana | RNC: 1-01-89378-8 | Winston Churchill No.93 Esquina Av. Gustavo Mejia Ricart, Edificio Comercial Blue Mall, Ens. Piantini, Santo Domingo, República Dominicana |