



XPS PRIVACY POLICY

XPEDITE PROCUREMENT SERVICES S.A.C., a Peruvian entity (“**XPS**”, “**we**” or “**us**”) respect your right to privacy. XPS is a subsidiary of Ferreycorp S.A.A. (“**Ferreycorp**”) and owns the brand “Omnimaq”, and this privacy policy (this “**Policy**”) also applies, as relevant, to other companies and entities within the Ferreycorp corporate group when they interact with you. This Policy explains how we may collect, share, use and process personal information about you, and how you can exercise your privacy rights. It applies to personal information we collect through our website (the “**Site**”), social media pages, integrations with XPS Business Partners (as defined below), as well as through our marketing activities, services we provide to our clients, live events, any offline business interactions you may have with us, and other activities described in this Privacy Notice (collectively, the “**Services**”).

We may provide additional or supplemental privacy notices for specific products or services that we offer at the time of collection. Unless otherwise noted, those supplemental notices should be read together with this Policy.

1. Personal Information We Collect

When you use our Services, we collect personal information about your use of our Services and information that you send us.

We may collect and store the following information when running the Services:

- *Information You Provide Voluntarily.* We collect information that you voluntarily provide to us, including, but not limited to: when you sign up for the Services; when you use the Services; when you communicate via email or other channels; when you sign up for news, publications and marketing communications and events; when you seek career information; when you register for communications newsletters, alerts, or other materials; when you submit information to the Site; when you sign up for a webinar or event; when you respond to our communications or requests for information. The information you provide may include: your name, contact information, title, and information about the organization with which you are affiliated, including sensitive and confidential information. In relation to career information, the information you provide may also include employment history and qualifications. We only collect and process the personal information we need to allow us to respond to your request and/or provide the particular service you have sought.
- *Information We Collect Automatically.* We may automatically collect information about you when you use our Services such as, but not limited to:



- *Device Information.* We may collect information about devices you use to access the Services and how you use the Services, such as your Internet Protocol (“IP”) address and which websites you visited before accessing our Services.
- *Performance and Log Data.* Our servers may automatically record information created by your use of our Services, which may include information such as, but not limited to, your IP address, browser type, operating system, command line information, diagnostic information related to the Services (e.g., crash activity reports), the referring web page, pages visited, location, your mobile carrier, device and application IDs, and search terms. For instance, when we send you an email, we may collect certain information including the nature of the email, whether you opened or deleted our email, action you took upon receipt of our email, or your name and contact information.
- *Cookies.* We use cookies to display information more effectively, store, on a user’s computer or device information about the user’s preferences and settings, gather statistical information about the use of our Services to improve our design and functionality, and for security purposes. Cookie information is stored in formats that do not allow us to directly identify the data subject, is not shared with third parties for their independent purposes, and is not used to send unsolicited communications.
- *Information We Receive From Third Parties, including but not limited to XPS Business Partners.* You acknowledge and agree that the Services you receive may include services and offerings from third parties (such third parties, “**XPS Business Partners**”). When we receive personal information about you from third parties, including but not limited to XPS Business Partners, and use such information, this can include: your name, email address, contact information, the company you work for, your position, business and home address, identification and background information, professional experience and qualifications, previous positions, financial information, such as payment related information and shareholdings, and other personal information. It may also include information about the organization you are affiliated with, including sensitive and confidential information.

If you connect to us from a social network, such as LinkedIn or Facebook, we will collect personal information from the social network in accordance with your privacy settings on that social network. The connected social network may provide us with information such as your name, profile picture, network, gender, username, user ID, age or age range, language, country, friends list, follower list, and any other information you have agreed it can share or that the social network provides to us. We will assume that such social network or other third parties are entitled to collect and share such personal information with us.

- *Sensitive Information.* We may collect sensitive information about you when you use our Services. Any use of such information is limited to such purposes described to you at the time of collection.



Under applicable Peruvian data protection law, certain processing activities require your prior, informed, express, and unequivocal consent; where sensitive data is involved, written consent may be required. Your provision of consent through affirmative actions (for example, clicking an acceptance box) authorizes us to process your data for the stated purposes.

2. How and Why We Use Your Information

- *To Provide Our Services to You.* We may process your personal information to inform you about our Services, new legal and policy developments, relevant information in the industries we serve, and our marketing events. Without your personal information, we cannot provide such Services.
- *To Respond to Your Inquiries.* We process your personal information when you contact us, such as with questions, concerns, feedback, disputes or issues. Without your personal information, we cannot respond to you or ensure your continued use and enjoyment of the Services.
- *To Enforce Our Terms or Agreements.* We process your personal information to actively monitor, investigate, prevent and mitigate any alleged or actual prohibited, illicit or illegal activities in connection with our Services; investigate, prevent, or mitigate violations of our terms, agreements or policies; and enforce our agreements with third parties and partners. We cannot perform our Services in accordance with our terms, agreements or policies without processing your personal information for such purposes.
- *To Ensure the Security of the Services.* We are committed to ensuring your safety and continued enjoyment of our Services. To do so, we process your personal information to: combat spam, malware, malicious activities or security risks; improve and enforce our security measures; and to monitor and verify your identity so that unauthorized users do not access your account with us or your information we otherwise hold. We cannot ensure the security of our Services if we do not process your personal information for security purposes.
- *To Personalize Your Experience on the Services.* We may provide you with third-party services, plugins, and many other options to personalize your experience of our Services. In addition, we also use cookies and similar tracking technology for such purposes. By personalizing the Services, you get to enjoy our Services even more because we keep track of your preferences (e.g. your language selection, your time zone, etc.). Without processing your personal information for such purposes, you may not be able to access or personalize part or all of our Services.
- *For Research and Development Purposes.* To continue to provide you with our innovative Services, we collect information about the way you use and interact with our Services for research and development purposes. Research and development help us improve our Services and build new Services and customized features or Services. We take additional security measures when processing your personal information for such purposes, by de-identifying or pseudonymizing your information, limiting access to personnel that may



conduct research and development, and applying other technical, physical, and administrative security measures.

- *For Potential Employment.* We process your personal information when you seek employment with us to evaluate you as a candidate for the position. Without your personal information, we cannot evaluate your qualifications for employment.
- *To Engage in Marketing Activities.* We process your personal information to inform you about our Services, new legal and policy developments, relevant information in the industries we serve and our marketing events (including by electronic means, such as email). To do so we may process your contact information or information about your interactions on our Services to send you marketing communications; provide you with information about events, webinars, or other materials; deliver targeted marketing to you; and keep you updated about our Services. You can opt-out of receiving our marketing information at any time by clicking an unsubscribe link in our emails.
- *To Improve the Services.* We process your personal information and information about the organization you are affiliated with to improve the Services, to ensure they are provided at a high-level for you and other recipients of our Services.

In addition, we may use your information to respond to or track inquiries and complaints; manage our client list and internal administration; conduct market studies or commercial/statistical research; perform billing processes and register invoices and receipts (including for suppliers and clients); evaluate candidates for employment at XPS or other Ferreycorp entities; evaluate and grant credit, update or verify your information; support and obtain information on the quality of our products and services; and prevent security breaches or violations of law or contractual terms. With your consent, we may invite you to seminars, trainings, workshops, contests, surveys, and similar activities, and send information or advertising about products and services of XPS and other companies and entities within the Ferreycorp corporate group.

3. Information Sharing and Disclosure

We do not sell, exchange, transfer, or give your personal information to any other company or individual for any reason except as set forth in this Privacy Notice and as described below:

- We may share your information with other companies and entities within the Ferreycorp corporate group for the purposes you have authorized. We may also share your information with our Business Partners, or third-party service providers and partners who support our operations (for example, internet service providers, website administrators, social media account managers, call centers, messaging and transportation providers, training/seminar organizers, and clients), some of whom may be located outside of Peru (for example, providers such as Google LLC in the United States or SAP SE in Germany). We may also disclose information to public authorities and competent regulators when required by law or for legal, judicial, or administrative processes.



- We share information with our service providers, suppliers, subcontractors, and similar third parties who provide services to us or our affiliates, or act on our behalf so that they can assist us with the maintenance of our Services. Our contracts with these service providers prohibit them from sharing your personal information with others for other purposes than as directed by us.
- We may transfer information to a third party in case of the reorganization, sale, merger, joint venture, assignment, transfer or other disposition of all or any portion of our business, asset or stocks, including in the event of corporate restructuring. We reserve the right, as part of this transaction, to transfer or assign personal information we have collected from you to these third parties. Except as otherwise provided by a bankruptcy or other court, the use and disclosure of all personal information will be subject to policies that are consistent with the policies described in this Privacy Notice. However, any personal information that is submitted or collected after that transfer may be subject to a new privacy policy adopted by the successor entity.
- We may use, share, or disclose information about you in order to address legal concerns or liabilities.
- We will disclose your information to a person you have given us your consent to disclose to or as required to complete the Services.
- We may store, process, and transmit personal information in locations outside of your country or jurisdiction, which may have data protection laws that are less protective than the laws of your jurisdiction. Where required, we will implement appropriate safeguards for cross-border transfers and only transfer personal information in accordance with applicable law.

4. Security

We seek to use reasonable technical, organizational, and administrative measures to protect user information within our organization against unauthorized or unlawful access or processing, and against accidental loss, destruction, or damage. We believe that these measures are reasonably adapted to the nature of the information in our custody. In addition to the security measures detailed above, we protect personal information by taking measures: (i) to protect the ongoing confidentiality, integrity, availability, and resilience of our processing systems and services; (ii) to restore the availability of and access to personal information in a timely manner in the event of a physical or technical incident; and (iii) to regularly test, assess, and evaluate the effectiveness of our technical and organizational measures.

However, even though XPS makes reasonable efforts to protect information in its custody, no security system or data storage or transmission over the Internet or otherwise is fully secure. Thus, we cannot guarantee the security of any information we may have collected or received from you or transmitted to you.



If you believe your information is not secure, please immediately notify us of the problem at the address provided in the “How to Contact Us” section below.

5. Retention

We retain information about you for as long as necessary to perform the activities described in this Privacy Notice, or where we have an ongoing legitimate business need to do so, such as for legal, regulatory, accounting or reporting requirements. Where required under Peruvian law, we may retain your information for an indefinite period or until you revoke your consent. When our basis to retain personal information ceases, we will delete or anonymize your information, and to the extent residual information remains in backups or archives, we will isolate such information from further processing until deletion is possible.

When our legitimate interest for retaining your personal information ceases to exist, we will either delete or anonymize your information so that it can no longer be attributed to a particular individual. To the extent residual information remains within our databases, back-ups or other records and we are unable to anonymize it we will isolate such information from further processing until deletion is possible. If you have any questions, please feel free to contact us.

6. Children’s Information

We do not knowingly collect any personal information from children under the age permissible under applicable law. If we become aware of collection of information from a minor without required consent, we will delete the information as soon as possible. Specifically, we do not knowingly collect any personal information from minors under 18. If you are between 14 and 18 years old, you must have authorization from your parent or legal guardian to use our Sites and Services and must provide their contact details so we can verify consent.

7. Privacy Rights and Choices

Depending on applicable law where you reside or are located, you may be able to assert certain rights identified below with respect to your personal information. Any rights you may have in relation to your personal information are not absolute. We reserve the right to refuse to act on a request that is manifestly unfounded or excessive (for example because it is repetitive) and/or to charge a fee that takes into account the administrative costs for providing the information or taking the action requested.

- *Right to Know/Access.* You may have the right to obtain a copy, or a list of categories of the personal information that we hold about you, as well as other supplementary information, such as the purposes of processing, and the entities to whom we disclose your personal information.
- *Right to Correct.* You may have the right to correct any of your personal information in our records and systems. You may request us to rectify, correct or update any of your personal information held by us that is inaccurate.



- *Right to Delete.* Under certain circumstance, you may have the right to request that we delete the Personal Information that we hold about you. This right is not absolute, and we may refuse such a request if there are compelling legitimate grounds for keeping your personal information, for legitimate purposes, or as required by law. In addition, in the event your deletion request is honored, we may retain a record of your deletion request as required under applicable law.
- *Right to Portability.* You have the right to receive a copy of the personal information we have collected about you in a structured, commonly used and machine-readable format.
- *Right to Opt-Out of Automated Decision-making or Profiling.* You may have the right not to be subject to a decision which significantly impact your rights that is based solely on automated processing (where a decision is taken about you using an electronic system without human involvement). No decision will be made by us about you solely on the basis of automated decision making which has a significant impact on you.
- *Right to Appeal.* In certain jurisdictions, you may have the right to appeal if we refuse to take action on your rights request. Instructions on how to appeal will be provided to you upon such a denial, but in any event, such instructions will be substantially similar to those provided below for submitting requests.
- *Right Against Discrimination.* You may have the right not to be discriminated against for exercising any of the rights described in this section. We will not discriminate against you for exercising your rights.

We do not sell your personal information. We do not share your personal information for targeted advertising. We do not process any information that may be considered “sensitive personal information”, under certain laws, to infer characteristics about you.

To make a privacy rights request, or to exercise the rights of access, rectification, cancellation, opposition, information, and revocation regarding your personal data, you may contact us by email at info@omnimaq.com. To confirm your identity, we may ask you to verify personal information we already have on file for you. If we cannot verify your identity based on the information we have on file, we may request additional information from you, which we will only use to verify your identity, and for security or fraud-prevention purposes.

In your request, please make clear what information you would like to have changed, whether you would like to have your personal information correct, deleted, or other limitations you would like to put on our use of your personal information. We may only implement requests with respect to personal information that is associated with the particular email address that you use to send your request.

You may use an authorized agent to submit a rights request on your behalf. If you use an authorized agent to submit requests on your behalf, we will require you to directly verify your identity with us, or have you directly confirm with us that the authorized agent has been authorized to act on your behalf.



Depending upon the applicable law, access to your rights may be denied: (a) when denial of access is required or authorized by law; (b) when granting access would have a negative impact on another's privacy; (c) to protect our rights and properties; or (d) where the request is frivolous or vexatious, or for other reasons.

8. International Transfers and Processing Locations for U.S. Users

As a company operating in multiple jurisdictions, we may store, process, and transmit your personal information in the United States and in other countries where we or our service providers operate. These locations may have data protection laws that differ from those of your state of residence. Where we transfer personal information to service providers or affiliates located outside your state or country of residence, we implement reasonable contractual, technical, and organizational safeguards designed to protect such information consistent with applicable U.S. federal and state privacy laws. By using our Services, you acknowledge and understand that your personal information may be transferred to and processed in jurisdictions outside of your state of residence, subject to the safeguards described in this Privacy Policy.

9. Notice to U.S. Residents – State Privacy Rights

This Section applies to residents of U.S. states that have enacted comprehensive consumer privacy laws, including but not limited to California, Colorado, Virginia, Connecticut, Utah, Texas, Oregon, and other applicable jurisdictions (collectively, “**Applicable State Privacy Laws**”). Depending on your state of residence and subject to applicable law, you may have the following rights regarding your personal information:

Right to Know/Access. You may request confirmation of whether we process your personal information and request access to such information.

Right to Correction. You may request correction of inaccurate personal information we maintain about you.

Right to Deletion. You may request deletion of personal information we have collected from you, subject to certain legal exceptions.

Right to Data Portability. You may request a copy of your personal information in a portable and, to the extent technically feasible, readily usable format.

Right to Opt-Out. Depending on your state of residence, you may have the right to opt out of the sale of personal information; the sharing of personal information for cross-context behavioral advertising; and/or profiling in furtherance of decisions that produce legal or similarly significant effects.

We do not sell personal information as defined under Applicable State Privacy Laws. We do not knowingly engage in profiling in furtherance of decisions that produce legal or similarly significant effects.



Right to Appeal. If we decline to take action on your privacy request, you may have the right to appeal our decision, subject to applicable state law. Instructions for submitting an appeal will be provided in our response.

Authorized Agents. You may designate an authorized agent to submit a request on your behalf, subject to identity verification requirements.

To exercise your rights, please contact us at info@omnimaq.com with the subject line “U.S. Privacy Rights Request.” We will take reasonable steps to verify your identity before processing your request.

We will not discriminate against you for exercising any of your privacy rights.

10. Notice to California Residents

The California Consumer Privacy Act of 2018, as amended by the Consumer Privacy Rights Act of (“CCPA”), requires us to explain the “**Personal Information**” categories, as identified and defined by the CCPA (see California Civil Code section 1798.140(o)), that we collect, the reason we collect the Personal Information, where we obtain the Personal Information, and the other entities with whom we may share the Personal Information. Under the CCPA, Personal Information is defined as any information that identifies, relates to, describes, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular consumer or household (“**Personal Information**”).

We generally collect the following categories of Personal Information in providing our Services:

- identifiers such as a name, address, unique personal identifier, email, phone number, your device’s IP address, software, and identification numbers associated with your devices;
- characteristics of protected classifications under California or federal law, such as gender;
- commercial information such as records of products or services purchased, obtained, or considered by you;
- Internet or other electronic information regarding you browsing history, search history, the webpage visited before you came to our website, length of visit and number of page views, click-stream data, locale preferences, your mobile carrier, date and time stamps associated with transactions, and system configuration information;
- professional or employment-related information;
- your geolocation, to the extent you have configured your device to permit us to collect such information; and
- inferences about your preferences, characteristics, behavior and attitudes.



The categories of other individuals or entities with whom we may share your Personal Information are listed in section 4 above.

California law requires us to inform California residents who have provided us with personal information that they may request of us information about our disclosures to third parties (including PAG Affiliated Entities) for their direct marketing purposes. To do so, contact us info@omnimaq.com and indicate in the subject line “**California Privacy Rights.**”

Do Not Track. Please note that we do not currently respond to web browser “do not track” signals or other mechanisms that may allow you to opt out of the collection of information across networks of websites and online services as there is no standard for how online services should respond to such signals.

11. Links to Third Party Services

Our Services may include links to third party services, including XPS Business Partners, where you might be able to post comments, reviews, or view third party information, and receive services which are similar to or integrated with the Services. Please note, the inclusion of a link on our Services to a third party’s service, including but not limited to an XPS Business Partner, does not imply endorsement of the third party’s data handling practices, and does not imply that the third party’s practices are covered by this Privacy Notice. We are not responsible for the privacy practices of these entities.

12. Changes to this Privacy Notice

We may update this Privacy Notice from time to time. The effective date of the current Privacy Notice is noted at the top of this page.

If we make material changes to the way we collect, use, share or process the personal information that you have provided that adversely impact you, we will notify you by posting it on the Services or other appropriate means. Any modifications to this Privacy Notice will be effective upon our posting the modified version (or as otherwise indicated at the time of posting). In all cases, your use of the Services after the effective date of any modified Privacy Notice indicates your acknowledging that the modified content of the Privacy Notice applies to your interactions with the Services and our business.

13. How to Contact Us

You can contact us via email at info@omnimaq.com.

Updated April 8, 2026.