

PRIVACY NOTICE

LUP TOOLS S.A.S., a commercial company legally incorporated under Colombian law, identified with NIT 901.803.834-0, with its main office in the city of Medellín, in compliance with Law 1581 of 2012, Decree 1377 of 2013, and related regulations, hereby informs the holders of personal data that it collects, stores, uses, transmits, and deletes personal information under the following conditions:

1. Data Controller

Company name: LUP TOOLS S.A.S.

NIT: 901.803.834-0

Main office: Medellín

Address: Calle 5 SUR No. 43 C 80 PISO 8, Medellín, Colombia

Contact email: hello@lup.com.co

2. Purposes of Processing

The personal data collected by LUP TOOLS S.A.S. will be used for the following purposes:

- Manage the commercial, contractual, or labor relationship with its clients, suppliers, partners, employees, and users.
- Provide the Software as a Service (SaaS) platform focused on OKR (Objectives and Key Results) management, organizational experimentation, knowledge gathering, and the use of generative artificial intelligence for strategic decisions.
- Comply with legal, accounting, contractual, and regulatory obligations.
- Inform about updates, features, news, events, or improvements to the technological platform.
- Perform statistical analysis, usage metrics, business intelligence, and advanced analytics.
- Manage requests, complaints, claims, or inquiries from data subjects.
- Transfer or transmit data to third parties located in Colombia or abroad when necessary to fulfill the purposes described above, ensuring appropriate standards of security and confidentiality.
- Inform about data analysis, study results, training, deliverables from consulting services, benefits, campaigns, news, statistics, invoice processing, among other purposes related to LUP.

3. Rights of the Data Subject

As the holder of personal data, you have the right to:

- Know, update, and correct your personal data.
- Request proof of the authorization granted for the processing of your data.
- Be informed about how your data has been used.
- File complaints with the Superintendence of Industry and Commerce for violations of data protection regulations.
- Revoke the authorization and/or request the deletion of your data when the processing does not respect legal and constitutional principles, rights, and guarantees.
- Access your personal data that has been processed, free of charge.

4. Mechanisms to Exercise Your Rights

To exercise your rights as the data subject, you may send a request to the email hello@lup.com.co, indicating your full name, identification number, a clear description of the request or right you wish to exercise, and the documents supporting your request.

A response will be provided within the timeframes established by law (maximum 15 business days, depending on the case).

5. Personal Data Processing Policy

The Personal Data Processing Policy adopted by LUP TOOLS S.A.S. can be consulted on the website: <https://www.lup.com.co/>, where you will find details about procedures, security measures, and conditions applicable to the processing of your personal information.

LUP TOOLS S.A.S. reserves the right to modify this privacy notice at any time. Any modification will be properly communicated through regular communication channels and/or the official website.