

Personal Data Protection and Privacy Policy Territoria.

Territoria, comprised of El Olivar SpA, Territoria SpA, Territoria Asset Management SpA, Territoria Apoquindo S.A., Territoria Santa Rosa SpA, SIR Desarrollo Inmobiliario II SpA and Fondo de Inversión Privado Apoquindo, is committed to promoting sustainable urban development, creating value for all its stakeholders. To achieve this objective, its social responsibility includes unrestricted respect for human rights, full compliance with its labor obligations, care for the environment and the building of virtuous relationships with the community.

Any person who considers that any of the principles or rules contained in this document have been violated may report the fact confidentially and anonymously to any of the following means:

- E-Mail: mvalles@Territoria.cl
- Whistleblower channel: <http://denuncias.mut.cl/>

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a. Objective

The health, safety and welfare policy (hereinafter indistinctly referred to as "the Policy") of Territoria (hereinafter also "the Company" or "the Company") aims to protect and respect your privacy. This Policy details how we collect, use, share and protect your personal information.

Territoria states that it respects the privacy and the right to informational self-determination of every person and that it is responsible for the treatment of personal data collected, processed and stored in any fixed, portable or remote storage media, website or intranet, in accordance with the Political Constitution and the laws of the Republic of Chile.

b. Scope

The scope of the Policy covers all of the Company's activities, and compliance with it must be ensured in each of its assets. This policy is applicable to all employees, who have the obligation to report any fact that may constitute a violation of the principles or rules contained therein.

Likewise, the Company shall extend its obligations and require compliance with them to any person with whom it enters into an act or contract, whatever its nature, whether they are suppliers, lessees or any other. To this end, clauses shall be established to sanction non-compliance, which may include the termination of the act or contract.

Finally, Territoria will promote its compliance among the other interested parties, through suitable dissemination mechanisms.

c. Principles

The Company has adopted the following 7 principles due to their importance in relation to the development of its activities and business, assuming the commitment to respect them and promote their compliance by all its stakeholders.

For the purposes of this Policy, stakeholders are understood as all those who have a direct or indirect interest in Territoria's business, such as customers, employees, tenants, suppliers and contractors, other related companies or companies that have commercial relations with the Company, the financial community, trade organizations, the media, authorities, local communities, among others.

Principle 1: Data protection.

This section refers to the safeguarding and proper handling of personal information. It involves ensuring the confidentiality, integrity and availability of data, as well as compliance with regulations and privacy policies to protect the information of individuals against unauthorized access or improper use, such as:

- Legality, fairness and transparency.
- Purpose limitation

- Data minimization
- Accuracy
- Retention period limitation
- Integrity and confidentiality

Principle 2: Data collection.

Data collection focuses on the ethical and transparent collection of information. This involves informing individuals about the reason for and scope of data collection, obtaining their consent where necessary. It also stresses the importance of limiting collection to data that is relevant and necessary for the specific stated purpose, avoiding unnecessary accumulation of personal information.

Types of Data Collected:

- Identifying Data: such as names, IDs, dates of birth.
- Contact Data: E-mail addresses, telephone numbers.
- Financial Data: Bank account numbers, transaction details.
- Browsing Data: Cookies, IP addresses, browsing histories.

Means of Data Collection:

- Web Forms: Through forms on our website or applications.
- Direct Communications: Emails, calls, and other direct communications with data subjects.
- Third Parties: Service providers and business partners.

Principle 3: Use of data.

Personal data collected and stored may be used for the following purposes, depending on the particular case in which they are provided or collected, according to this Policy:

- Fulfilling contracts.
- Communication.
- Marketing, with consent.
- Fulfillment of legal obligations.
- Improvement of services.

Principle 4: Legal legitimacy for the processing of personal data and data transfer.

The processing of personal data is based on the following legal bases:

- Consent of the User.
- Statistical, pricing or other purposes for the general benefit of Territoria, its associates and the entities to which they are affiliated.

Territoria may share and transfer the information collected to any member of its group of companies, in Chile or abroad, in compliance with this Policy.

Territoria may transfer Users' personal data to third parties, for example, to website storage providers, software or cookie providers, IT service providers, or others.

In the event of a request from a competent authority or court, Territoria may disclose the User's personal data to such authority or court.

Personal data will be retained until the purpose for which it was collected is fulfilled or until the User exercises the right to rectification, cancellation or opposition. After this the data will be deleted, if retention periods or other legal grounds for retention no longer apply.

Principle 5: Data Security.

Whenever possible, communication between networked services and applications should be encrypted, being mandatory when this network traffics data outside the organization's local network.

Access control: By default, user rights and privileges should be the minimum necessary to fulfill their job responsibilities (principle of least privilege). Access to information and functionality of the system(s) should be granted on a need-to-know basis.

Monitoring and Logging: Systems and applications should be configured to automatically log and monitor user activities and security events.

Periodic Audits: In order to ensure the correct use of its proprietary information assets, Territoria reserves the right to audit at any time and without prior notice, the compliance with the policies in force and that are related to the access and use that users make of the information assets.

Principle 6: Data Retention.

Data is retained for a maximum of 5 years and in accordance with applicable laws and only as long as it is necessary for the purposes for which it was collected.

Principle 7: Rights of stakeholders.

The User has the following rights:

- Right of access: the User may request information about the processing of his/her personal data.
- Right to rectification: the User has the right to rectify their personal data that is inaccurate or incomplete.
- Right to deletion: the User has the right to request the deletion of his/her personal data, when its storage lacks legal basis or when it is outdated.

The exercise of the aforementioned rights must be made effective by sending a written request addressed to Territoria, Attention: Territoria Data, domiciled at Av. Apoquindo 2827, office 2001, Las Condes, Santiago, Metropolitan Region of Santiago, Republic of Chile; or to the contact e-mail misdatos@territoria.cl.

d) Implementation

This document must be implemented in accordance with current legislation, national regulations and standards, as well as international standards and those of each country where an asset is located, as

applicable. This includes all provisions related to current labor, environmental, non-discrimination, and inclusion regulations, among others.

In the event of a conflict between the principles and rules defined in this Policy and any of these regulations, the provisions of the latter shall always prevail.

The monitoring and control of compliance with the Policy shall be the responsibility of the responsible area.

The Manager in charge of the Policy will report on the progress of its implementation to the Executive Team or respective Committee on an annual basis, as well as any situations of non-compliance detected and the corrective measures adopted as a result.

Plans, procedures, and/or implementation or improvement actions shall be periodically disclosed by the Company to its stakeholders via appropriate channels.

e) Complaints and claims

Anyone who believes that any of the principles or rules contained in this document have been violated may report the matter confidentially and anonymously through the following channels:

- Email csilberberg@territoria.cl
- Reporting channel: <http://denuncias.mut.cl/>

Complaints will be heard by the Crime Prevention Officer, when appointed, who will implement the procedure established in the Company's Code of Ethics and Conduct, thus safeguarding the anonymity and confidentiality of the complainant, as well as the principles and rules of due process.

f) Revision

The Policy will be revised periodically to ensure its suitability and effective implementation. All revisions shall be subject to approval by the Executive Team or respective Committee.

g) Dissemination

The General Manager shall be responsible for taking all the measures he/she deems appropriate to make the Policy known and train the different stakeholders, with special concern for the Company's employees, investors, tenants, and suppliers as well as regulatory bodies, local authorities, and the general public.

The content associated with this Policy must be disseminated in a way that guarantees non-discriminatory and respectful access by different cultures, without negatively affecting the most vulnerable groups, such as children, the elderly, and immigrants.

In addition, contracts and communications must be clear and simple, written in language as close as possible to that normally used by the people to whom the message is addressed. They must also abide by statutory legislation, without using evasive or improper practices; be exhaustive and not omit any relevant elements that may affect decision-making; be made available on the Company's websites; and establish mechanisms to respond to the needs of people with disabilities.

h) Validity

This policy has been in force since it was approved and has not been modified to date.