

# PRIVACY NOTICE AND PERSONAL DATA PROCESSING POLICY

Quotanda México, S.A.P.I. de C.V.

June 2026

*Applicable to Mexico, Colombia, Chile and other Latin American countries where Quotanda operates*

Quotanda México, S.A.P.I. de C.V. (hereinafter “Quotanda”), with registered address at Sirenas #36 interior 401, Colonia Infonavit Iztacalco, Alcaldía Iztacalco, C.P. 08900, Mexico City, Mexico, RFC: QME150209M46, is the controller of your personal data.

This document constitutes Quotanda’s Comprehensive Privacy Notice in accordance with the Federal Law on Protection of Personal Data Held by Private Parties (LFPDPPP, in force since 21 March 2025) for users in Mexico, and the Personal Data Processing Policy in accordance with Law 1581 of 2012 for Colombia and Law 19.628 for Chile, as well as the applicable regulations in the other Latin American countries where Quotanda provides its services.

Quotanda manages the education financing of your programme — including the application, evaluation, contract signing and payment administration process. Below we explain what data we process, for what purposes, whether your consent is required, and what your rights are.

## 1. Identity and Contact Details of the Data Controller

<b>Legal Name</b>	Quotanda México, S.A.P.I. de C.V.
<b>RFC</b>	QME150209M46
<b>Registered Address</b>	Sirenas #36 interior 401, Colonia Infonavit Iztacalco, Alcaldía Iztacalco, C.P. 08900, Mexico City, Mexico
<b>Data Requests Contact</b>	Support and Compliance Department — support@quotanda.com
<b>Email</b>	support@quotanda.com
<b>Website</b>	www.quotanda.com

### 1.1 Quotanda as Controller and as Processor

Quotanda operates in a dual capacity:

- As Data Controller: when processing data for its own purposes, such as identity verification, fraud and money laundering prevention, credit assessment or compliance with its own legal obligations.
- As Data Processor: when processing students’ personal data on behalf of and under the instructions of the partner educational institution. In this case, the educational institution is the Controller and is responsible to the student. This relationship is formalised by contract between Quotanda and each institution.

If you wish to exercise your rights in relation to data shared with Quotanda by your educational institution, you may contact either your institution or Quotanda directly at [support@quotanda.com](mailto:support@quotanda.com).

## 2. Personal Data Subject to Processing

Quotanda processes the following categories of personal data. Data that by nature is considered sensitive, patrimonial or financial is expressly identified below; such data requires your express consent in accordance with the LFPDPPP 2025:

### a) Identification and Contact Data

- Full name, date of birth and nationality
- Identity document number (CURP, INE, passport or equivalent depending on country)
- Federal Taxpayer Registry (RFC) or other tax identification number where applicable
- Postal address evidenced by proof of address
- Email address and mobile phone number
- Photograph of identity document for authenticity verification

### b) Patrimonial, Financial and Tax Data — Sensitive Data Requiring Express Consent

Under the LFPDPPP 2025, patrimonial, financial and tax data is treated as sensitive personal data and requires your express consent for processing:

- Bank statements and account movements
- Bank account number or CLABE interbank code for payment management
- Proof of income and payslips
- Information on current financial obligations and general economic situation
- Payment history related to your financing contract

### c) Credit History Data — Requires Express Written Consent (Mexico only)

With your prior, express and informed consent, and in accordance with the Law Regulating Credit Information Societies, Quotanda queries credit information societies to assess your credit profile and the viability of the requested financing. This query requires your express authorisation before it is carried out and will be recorded in your credit history.

### d) Employment and Professional Status Data — Requires Express Consent in ISA Contracts

- Employment status: employee, unemployed, self-employed or independent contractor
- Employer name and job title
- Monthly or annual income level
- Professional sector and work experience
- Periodic updates on employment status and income during the ISA contract term, required for the calculation of income-linked instalments

## e) Academic Data

- Educational institution where enrolled
- Programme, level of study and mode of delivery
- Enrolment status and programme start and end dates

## f) Fraud Prevention, Anti-Money Laundering and Identity Verification Data

- Full name for verification and screening against restrictive lists, politically exposed persons (PEP) lists and international sanctions lists applicable in each country
- Results of checks conducted in accordance with applicable anti-money laundering regulations

## g) Technical and Portal Usage Data

- IP address and device details
- Browser, operating system and time zone
- Pages visited and portal interactions
- Authentication and access logs

## 2.1 Sources of Data

- Directly from you: through the application form and documentation you provide.
- From your educational institution: enrolment and academic status data provided by the school or university under its collaboration agreement with Quotanda.
- From publicly accessible sources: Quotanda may search publicly available information on the internet and professional social networks to verify your application. Only information publicly accessible to any person is collected.
- From credit information societies (Mexico only): with your prior express consent, we obtain your credit history in accordance with applicable regulations.

# 3. Purposes of Personal Data Processing

## 3.1 Necessary Purposes — Indispensable for the Legal Relationship

The processing of your personal data for the following purposes is necessary and mandatory to establish, maintain and perform the legal and contractual relationship with Quotanda. These purposes do not require your express consent, except for patrimonial, financial and credit history data which, given their sensitive nature, do require it as indicated in Section 2:

- Receiving, evaluating and resolving your education financing application — Deferred Tuition, Payment Plan or Income Share Agreement — including review of documentation and assessment of your profile.
- Confirming, updating and verifying your information and identity to ensure the authenticity of documents submitted and compliance with programme access requirements.
- Processing your patrimonial, financial and tax data — bank statements, payslips, CLABE, payment history and information on financial obligations — to assess financing viability and administer the contract. Processing of this data requires your express consent as indicated in Section 2.

- Querying your credit history with credit information societies in accordance with the Law Regulating Credit Information Societies (Mexico only). This query requires your prior, express written consent and will be recorded in your credit history.
- Checking and verifying your information against restrictive lists, PEP lists and international sanctions lists, in compliance with applicable anti-money laundering and counter-terrorism financing regulations.
- Carrying out checks and analyses for fraud and identity theft prevention and control, protecting both Quotanda and the data subject from misuse of their information.
- Executing and administering your financing contract: instalment management, collections, contractual communications, payment plan changes and contract monitoring.
- Periodically managing your employment information and income during an ISA contract for the calculation of income-linked instalments. This purpose applies exclusively to data subjects who have signed an Income Share Agreement and requires your express consent within the ISA contract.
- Managing non-payment situations: direct contact and follow-up with the student, collaboration with the partner educational institution and, where strictly necessary, with authorised companies for extrajudicial debt recovery.
- Complying with Quotanda's legal obligations in fiscal, regulatory and anti-money laundering matters in each country where it operates.
- Sending you communications regarding the status of your application, instalment due dates, contract changes and security notices. These communications are an essential part of the service and may not be refused.

### 3.2 Secondary and Optional Purposes

Quotanda may additionally use your personal data for the following secondary purposes, which are not required to provide the service. For these purposes, Quotanda will request your separate express authorisation, which may be revoked at any time without affecting your access to the service or contractual relationship:

- Sending you commercial, informational or promotional communications about new products, services or education financing programmes that may be of interest to you.
- Carrying out statistical analyses and market research to improve services and develop new features, using anonymised or pseudonymised data where possible.

*To object to secondary purposes or revoke consent already given, email [support@quotanda.com](mailto:support@quotanda.com). Your objection or revocation will not affect your contractual relationship with Quotanda or the provision of the service.*

If your personal data was obtained indirectly — through your educational institution or from publicly accessible sources — you have 5 business days from our first contact with you to object to secondary purpose processing at [support@quotanda.com](mailto:support@quotanda.com).

## 4. Transfers and Disclosure of Data to Third Parties

### 4.1 Transfers Not Requiring Your Consent

The following transfers are necessary to fulfil the legal relationship with you or applicable legal obligations and, in accordance with Article 37 of the LFPDPPP 2025 and equivalent provisions in Colombia and Chile, do not require your prior consent:

- Your partner educational institution: receives transactional information on the status of your contract — instalments, payments and compliance — for programme administration. Full bank details are not shared.
- Service providers acting as Data Processors: companies providing the technology, operational and support services necessary to deliver the service — including management platforms, communications, digital signing and payment processing — which process your data solely under our instructions and under data processing agreements imposing the same protection obligations as Quotanda.
- Credit information societies (Mexico only): with your prior express consent and in accordance with the Law Regulating Credit Information Societies, we query your credit history. Although this transfer requires your prior express consent due to the nature of the data, it is provided for in specific applicable legislation.
- Specialised debt recovery companies: in case of non-payment and only to the extent necessary for debt recovery, we may share contact details and debt information with authorised companies for extrajudicial collections.
- Competent authorities: regulatory, tax, judicial or administrative bodies where we are legally required to provide information or where necessary for the prevention, detection or investigation of unlawful activities.
- Acquirers in a business transfer: if Quotanda were subject to an acquisition, merger or asset transfer, data may be transferred to the acquirer for service continuity.

## 4.2 Transfers Requiring Your Consent

The following transfers are secondary and optional. Quotanda will request your separate express consent before carrying them out:

- Commercial partners or allied institutions for marketing or promotion of products and services that may be of interest to you. In no case will your personal data be sold without your prior consent.

*You may object to these secondary transfers at any time by emailing [support@quotanda.com](mailto:support@quotanda.com) without affecting your contractual relationship with Quotanda.*

## 4.3 International Transfers

Some of Quotanda's Data Processors are located outside your country of residence. In all such cases, Quotanda ensures transfers are carried out with the following safeguards:

- Data Processing Agreements: Quotanda enters into a data processing agreement — equivalent to the European DPA — with each service provider located outside your country, obliging the recipient to process your data with the same protection guarantees required by applicable law in your country of residence.
- Providers in countries with recognised frameworks: several service providers are located in the European Union or countries with internationally recognised data protection frameworks.
- Country-specific regulations: Mexico — international transfers are made in accordance with Articles 36 and 37 of the LFPDPPP 2025 with data processing agreements guaranteeing protection equivalent to Mexican law. Colombia — international transmissions are made in accordance with Articles 26 and 27 of Law 1581 of 2012 and its implementing decrees. Chile — data communications abroad are made in accordance with Law 19.628, requiring recipients to meet equivalent protection standards.

## 5. Security Measures

Quotanda implements the administrative, technical and physical measures necessary to protect your personal data against damage, loss, alteration, destruction or unauthorised access, including:

- Encryption of communications between your device and our servers.
- Encryption of data at rest and in transit.
- Access controls restricting data processing to strictly authorised personnel.
- Change logging and audit trails to maintain data traceability.
- Confidentiality and data processing agreements with all service providers that access personal data.

In the event of a security breach affecting your data, Quotanda will notify the competent authorities and, where required by applicable law in your country, the affected data subjects.

## 6. Retention Periods

Category	Retention Period
<b>Selected applicant — active contract</b>	Duration of the contract and up to 36 additional months from closure, or the longer period required by applicable law in your country.
<b>Rejected applicant</b>	5 years from the date of rejection, in compliance with anti-money laundering regulations of each country.
<b>Applicant who abandoned the process</b>	5 years from the date the application lapsed due to inactivity (90 days).
<b>Cancellation request — Mexico</b>	Data will be blocked and subsequently deleted in accordance with Article 34 of the LFPDPPP, once mandatory legal retention periods have expired.
<b>Erasure request — Colombia and Chile</b>	In accordance with applicable local regulations. Erasure does not apply where data must be retained by legal obligation.
<b>Anti-money laundering data</b>	5 to 10 years from contract closure, in accordance with AML regulations of each country.
<b>Credit query authorisation — Mexico only</b>	Minimum 12 months from the date of query, in accordance with the Law Regulating Credit Information Societies.

Upon expiry of the applicable retention periods, data will be securely and irreversibly deleted or anonymised so that it can no longer identify the data subject.

## 7. Your Rights by Country of Residence

### 7.1 Mexico — ARCO Rights and Additional Rights

Under the LFPDPPP 2025, you have the following rights:

- Access: to know what personal data we hold about you, for what purposes we use it, and the general conditions of processing.
- Rectification: to request correction of your data where it is inaccurate, incomplete or out of date, providing documentation to evidence the correction.
- Cancellation: to request that we cease processing your data. Cancellation will result in the blocking and subsequent deletion of data, respecting mandatory legal retention periods. Cancellation does not apply where data must be retained by legal obligation.
- Objection: to object to the processing of your data for specific purposes, in particular for the sending of commercial communications.
- Limitation of use or disclosure: to request restriction of the use of your data in certain circumstances.
- Withdrawal of consent: to withdraw at any time consent given for processing for voluntary purposes, without retroactive effect on processing already carried out.

**To exercise your ARCO rights, send your request to Quotanda’s Support and Compliance Department:**

Email: [support@quotanda.com](mailto:support@quotanda.com)

Include: full name, CURP or official ID number, the right you wish to exercise, and a copy of your official ID.

Response time: maximum 20 business days under the LFPDPPP 2025, with an additional 15 business days to implement the measure adopted, extendable for justified cause.

If you are not satisfied with Quotanda’s response, you may contact the Secretaría de Anticorrupción y Buen Gobierno, the authority responsible for personal data protection in Mexico since 21 March 2025.

## 7.2 Colombia — Data Subject Rights

Under Law 1581 of 2012 and its implementing decrees, you have the following rights:

- To know, update and rectify your personal data held by Quotanda as Data Controller.
- To request proof of the authorisation granted for the processing of your data.
- To be informed of the use that has been made of your personal data.
- To lodge complaints with the Superintendence of Industry and Commerce (SIC) for breaches of data protection regulations.
- To revoke authorisation and request deletion of your data where processing does not comply with the principles of Law 1581. Deletion does not apply where data must be retained by legal or contractual obligation.
- To access your personal data under processing free of charge.

To exercise your rights, send your request to [support@quotanda.com](mailto:support@quotanda.com) indicating full name, identification number and description of the right you wish to exercise. Quotanda will respond within a maximum of 10 business days for queries and 15 business days for complaints, in accordance with Law 1581.

## 7.3 Chile — Data Subject Rights

Chile is currently governed by Law 19.628 on the Protection of Private Life. The new Law 21.719, published on 13 December 2024, will enter into full force on 1 December 2026 and will introduce a more robust framework with expanded rights aligned with international standards such as the EU GDPR. Quotanda commits to updating this notice when the new law enters into force.

Under Law 19.628 currently in force, you have the following rights:

- **Access:** to request information on the personal data we hold about you and how we process it.
- **Rectification:** to request correction of incorrect, inaccurate or out-of-date data.
- **Cancellation:** to request deletion of your data where its storage has no legal basis or retention periods have expired.
- **Blocking:** to request temporary suspension of processing in certain circumstances provided for by law.

To exercise your rights, send your request to [support@quotanda.com](mailto:support@quotanda.com) indicating full name, RUT and description of the right you wish to exercise. Quotanda will respond within the deadlines established by Chilean regulations.

## 7.4 Other Latin American Countries

If you reside in another Latin American country where Quotanda provides services, you may exercise the rights recognised by your country’s data protection regulations by sending your request to [support@quotanda.com](mailto:support@quotanda.com). Quotanda will comply with the requirements of each applicable local legislation.

## 8. Competent Authority by Country of Residence

Country	Competent Authority	Applicable Regulations
<b>Mexico</b>	Secretaría de Anticorrupción y Buen Gobierno (formerly INAI, since 21 March 2025) — <a href="http://www.anticorruptcion.gob.mx">www.anticorruptcion.gob.mx</a>	LFPDPPP 2025
<b>Colombia</b>	Superintendencia de Industria y Comercio (SIC) — <a href="http://www.sic.gov.co">www.sic.gov.co</a>	Law 1581/2012 and Decree 1377/2013
<b>Chile</b>	Consejo para la Transparencia (until Dec. 2026) — <a href="http://www.consejotransparencia.cl">www.consejotransparencia.cl</a> Agencia de Protección de Datos Personales (from Dec. 2026)	Law 19.628 (current) Law 21.719 (in force from 1 Dec. 2026)
<b>Other LATAM countries</b>	Competent data protection authority in your country of residence	Applicable local regulations

Before lodging a complaint with the competent authority, we invite you to contact us directly at [support@quotanda.com](mailto:support@quotanda.com). We are committed to handling your request with diligence and transparency.

## 9. Cookies

Quotanda uses cookies and similar technologies on its portal and website. For detailed information on the types of cookies used, their purpose, and how to manage or disable them, please see Quotanda’s Cookie Policy at: [www.quotanda.com/cookies](http://www.quotanda.com/cookies)

## 10. Changes to This Privacy Notice

Quotanda may update this Privacy Notice to reflect regulatory, operational or service changes. The current version will always be available at [www.quotanda.com](http://www.quotanda.com).

- Mexico: any material change in the processing of your data will be communicated in accordance with the LFPDPPP 2025, through the website or by email where the change is relevant to your rights.
- Colombia: material changes will be notified at least 10 business days before they take effect, in accordance with the requirements of the Superintendence of Industry and Commerce.
- Chile: changes will be published on the website with the date of update. Quotanda will update this notice before 1 December 2026 to reflect the entry into force of Law 21.719.