



DATA PRIVACY DECLARATION

CHILE ANNEX

1 INTRODUCTION

This Chile Annex forms an integral part of and supplements the ANDRITZ Global Data Privacy Declaration and applies to personal data processing operations subject to Law No. 21,719, including those falling within its territorial scope pursuant to Article 1 bis. Its content is in strict compliance with Law No. 21,719, which amends and modernizes Law No. 19,628 on the Protection of Private Life, now known as the Personal Data Protection Law, as well as with any other rules, regulations, and guidelines issued by the competent Chilean authority in the field of personal data protection.

This Annex aims to ensure transparency, lawfulness, security, and accountability in the processing of personal data, reflecting ANDRITZ's commitment to high standards of governance, regulatory compliance, and international best practices in data protection.

2 PRINCIPLES OF PERSONAL DATA PROCESSING

ANDRITZ processes personal data in Chile in accordance with the principles established under applicable Chilean legislation, including, but not limited to:

- **Lawfulness:** processing shall be carried out on a valid legal basis, as provided for under Law No. 21,719;
- **Purpose Limitation:** personal data shall be collected and processed for specific, explicit, and legitimate purposes that have been previously communicated to the data subject;
- **Proportionality and Data Minimization:** processing shall be limited to the data strictly necessary to fulfill the stated purposes;
- **Transparency:** data subjects shall be informed in a clear, accessible, and appropriate manner about the processing of their personal data;
- **Security:** appropriate technical and organizational measures shall be adopted to protect personal data against unauthorized access, loss, alteration, or improper disclosure;
- **Accountability:** ANDRITZ shall be responsible for demonstrating that its processing activities comply with applicable legislation.





3 LEGAL BASES FOR DATA PROCESSING IN CHILE

Personal data processing in Chile shall be carried out by ANDRITZ on the legal bases provided for under Law No. 21,719, as applicable according to the nature and purpose of each processing operation, including:

- **Compliance with Legal or Regulatory Obligations:** where processing is necessary to comply with legal requirements imposed by competent authorities;
- **Performance of a Contract or Pre-Contractual Measures:** where processing is indispensable for the performance of contracts to which the data subject is a party;
- **Legitimate Interest of the Controller:** provided that such interest does not override the fundamental rights and freedoms of the data subject;
- **Protection of Life or Physical Integrity:** where processing is indispensable to protect the life, health, or physical integrity of the data subject or another person in circumstances where the data subject is unable to provide consent;
- **Establishment, Exercise, or Defense of Rights before Courts of Justice or Public Bodies:** where processing is necessary for ANDRITZ to establish, exercise, or defend its rights in judicial, administrative, or arbitration proceedings, including the collection, processing, and submission of personal information required for its legitimate defense or to enforce its rights;
- **Data Relating to Economic, Financial, Banking, or Commercial Obligations:** where processing is carried out in accordance with the conditions and purposes set forth in Title III of Law No. 21,719, including the disclosure of data related to the economic, financial, banking, or commercial situation of the data subject under the terms authorized by law;
- **Consent of the Data Subject:** where required by law, obtained in advance in an express, informed, and unequivocal manner, and which may be withdrawn at any time.

4 PROCESSING OF SENSITIVE PERSONAL DATA

The processing of sensitive personal data, as defined under Chilean legislation, shall be carried out on a restrictive and exceptional basis, only where strictly necessary and subject to compliance with the specific applicable legal requirements and the data subject's prior express, specific, and prominent consent. Consent may be dispensed with only where processing is based on one of the grounds expressly authorized by law, except legitimate interest.

ANDRITZ shall adopt enhanced safeguards for this type of processing, including strict access controls, segregation of environments, detailed logging of operations, and prior assessments of risks to the rights and freedoms of data subjects.

5 RIGHTS OF DATA SUBJECTS IN CHILE



Under Law No. 21,719, individuals who are data subjects in Chile have, among others, the following rights:

- **Right of Access:** to obtain confirmation as to whether processing exists and to access their personal data;
- **Right to Rectification:** to request the correction of inaccurate, incomplete, or outdated data;
- **Right to Erasure:** to request the deletion of data where it is no longer necessary or where processing is carried out in violation of the law;
- **Right to Object:** to object to processing in certain circumstances provided for by law;
- **Right to Restriction of Processing:** to request the restriction of the use of their personal data;
- **Right to Information:** to be informed about the purposes, legal bases, disclosures, and international transfers of data;
- **Right to Review Automated Decisions:** where applicable;
- **Right to Data Portability:** to receive the personal data they have provided in a structured and commonly used format and request its transmission to another controller where processing is based on consent or the performance of a contract and is carried out by automated means.

Requests may be submitted through the official channels made available by ANDRITZ and shall be addressed within the statutory time limits established under Chilean law.

6 INTERNATIONAL DATA TRANSFERS

International transfers of personal data relating to data subjects located in Chile shall only take place where an adequate level of protection is ensured, in accordance with Law No. 21,719 and legally recognized mechanisms, such as:

- Transfers to countries or organizations that provide an adequate level of protection;
- Contractual clauses containing specific data protection safeguards;
- Binding Corporate Rules (BCRs) applicable to intra-group transfers;
- Express consent of the data subject, where necessary;
- Compliance with legal obligations or contractual performance, under the terms of the law.

ANDRITZ shall periodically review its international transfer mechanisms, document the assessments performed, and implement additional measures where necessary.

7 SHARING OF PERSONAL DATA WITH THIRD PARTIES



The sharing of personal data with third parties in Chile shall occur only where necessary to fulfill the stated purposes and on a valid legal basis. ANDRITZ shall require such third parties to adopt data protection measures compatible with Chilean legislation and the company's internal policies.

8 RECORD OF PROCESSING ACTIVITIES

ANDRITZ shall maintain up-to-date records of personal data processing operations carried out in Chile, containing information on purposes, categories of data, legal bases, recipients, retention periods, and security measures adopted. Such records may be made available to the competent Chilean authority upon request.

9 DATA PROTECTION IMPACT ASSESSMENT

Whenever personal data processing is likely to result in a high risk to the rights and freedoms of data subjects, ANDRITZ shall conduct Data Protection Impact Assessments, documenting the risks identified and the mitigation measures implemented, in accordance with Law No. 21,719.

10 DATA RETENTION AND DISPOSAL

Personal data shall be retained only for as long as necessary to fulfill the purposes of the processing and the applicable legal obligations, in accordance with Law No. 19,628. Once the purpose has been fulfilled, the data shall be deleted or anonymized, unless continued retention is permitted or required by applicable law. The retention and deletion criteria are as follows:

- **Compliance with Legal Obligations:** data shall be retained for the period required under applicable legislation, including tax, labor, and regulatory rules applicable in Chile.
- **Contractual Compliance and Defense of Rights:** data related to contracts shall be retained for as long as necessary to comply with obligations and to exercise or defend rights in administrative or judicial proceedings.
- **Absence of a Specific Legal Period:** where no legal requirement applies, data shall be retained for the period strictly necessary for the purpose for which it was collected, in accordance with the principles of proportionality and storage limitation.
- **Secure Erasure or Anonymization:** where data is no longer necessary, it shall be securely erased or anonymized through appropriate technical and organizational measures to prevent unauthorized access or recovery, including physical destruction or permanent deletion of electronic records.

ANDRITZ implements internal data retention policies and conducts periodic audits to ensure compliance with applicable regulations.



11 INFORMATION SECURITY AND INCIDENTS

ANDRITZ adopts appropriate technical and organizational measures to protect personal data against unauthorized access, disclosure, loss, destruction, or alteration, in accordance with Chilean legislation. Key measures include:

- Encryption of data in transit and, where appropriate, at rest, to ensure confidentiality;
- Restricted access controls ensuring that only authorized persons have access to personal data;
- Continuous monitoring of systems to detect anomalous activities and prevent security incidents;
- An incident management policy with specific procedures for responding to and mitigating security breaches;
- Periodic employee training on data protection and information security best practices.

In the event of a breach of security measures that may pose a reasonable risk to the rights and freedoms of data subjects, ANDRITZ shall immediately adopt containment and mitigation measures and shall notify the Chilean Personal Data Protection Agency (Agencia de Protección de Datos Personales) without undue delay, as well as the affected data subjects where required by applicable law.

12 DATA PROTECTION OFFICER IN CHILE

To comply with the requirements of Law No. 21,719, ANDRITZ appoints a Data Protection Officer (DPO) for Chile, responsible for assisting data subjects and regulatory authorities.

Contact Details of the Data Protection Officer in Chile:

DPO Name: CRISTIÁN CAMUS

Email: Compliance.Latam@andritz.com

13 HOW DATA SUBJECTS MAY EXERCISE THEIR RIGHTS IN CHILE

ANDRITZ provides a dedicated portal through which data subjects may exercise the rights established under Law No. 19,628, as amended by Law No. 21,719. All requests must be submitted exclusively through the service portal available at the following link:

[Data Services Portal](#)

Through this portal, data subjects may request information about the processing of their data, exercise their rights of access, rectification, erasure, objection, portability, and blocking, and obtain additional clarification regarding ANDRITZ's protection of personal data.



Requests shall be reviewed and addressed within the time limits established under Chilean law. To ensure information security and prevent unauthorized access, ANDRITZ may adopt procedures to verify and validate the identity of the requester before fulfilling the request.

14 CHANGES AND UPDATES

This Annex may be updated periodically to reflect legislative or regulatory changes or guidance issued by the Chilean authority, thereby ensuring continued compliance.

15 FINAL PROVISIONS

This Chile Annex forms part of the ANDRITZ Global Data Privacy Declaration and shall prevail with respect to all personal data processing operations carried out in Chile, without prejudice to the application of other relevant global provisions.