

	PRIVACY POLICY	Code: Version: Date: Page: 1 of 8
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1. PURPOSE

To inform individuals who visit our website <https://ipac-acero.com/> about the data we collect, the purpose of processing, and how data subjects can exercise their personal data protection rights.

IPAC S.A. will ensure the implementation of organizational and technical measures to securely and effectively process personal data in accordance with the current legislation and any provisions that modify, add to, or complement it.

2. SCOPE

This Privacy Policy applies to the processing of personal data collected through the official website of IPAC S.A. <https://ipac-acero.com/> or through forms, digital channels, and/or other means provided by the company.

This policy is addressed to all data subjects whose personal data are processed by IPAC S.A. in its capacity as the data controller.

IPAC S.A. is committed to processing personal data lawfully, fairly, and transparently, in accordance with the purposes informed in this document.

3. CONTROLLER – WHO WILL PROCESS YOUR DATA?

The controller is IPAC S.A., who will collect, store, and process personal data as set forth in this policy and in accordance with the Law.

Address: km 10.5 Vía Daule – Guayaquil

Phone: +593 4 370 2120

E-mail: protecciondedatospersonales@ipac-acero.com

4. DEFINITIONS

The following definitions apply for the purposes of this policy:

Processing: Any operation or set of operations performed on personal data, whether automated, partially automated, or not automated, such as collection, recording, organization, structuring, storage, adaptation, modification, retrieval, consultation, use, disclosure, transfer, restriction, erasure, or destruction, or any other use.

Database: A structured set of data, regardless of format, creation method, storage, organization, processing, location, or access, whether centralized, decentralized, or functionally or geographically distributed.

Personal Data: Data that identifies or makes a natural person identifiable, directly or indirectly.

Data Subject: The natural person whose data is being processed.

Data Controller: The natural or legal person, public or private authority, or other entity that determines the purposes and means of processing.

Data Processor: The natural or legal person, public or private authority, or other entity that processes personal data on behalf of the controller.

Recipient: Any natural or legal person to whom personal data is disclosed.

Transfer: Any act of communication, transfer, consultation, interconnection, dissemination, or any other form of disclosure of personal data to a person other than the data subject, controller, or processor. Transferred data must be accurate, complete, and up to date.

5. WHAT PRINCIPLES APPLY?

IPAC S.A. commits to processing the personal data of data subjects in accordance with the principles of lawfulness, fairness, transparency, purpose limitation, relevance, proportionality, confidentiality, quality and accuracy, storage and security, and accountability, as established by the Organic Law on Personal Data Protection (LOPD).

6. PURPOSES – WHY DO WE NEED YOUR DATA?

The processing activities respond to legitimate, specific, and proportionate purposes, according to the nature of the relationship with each personal data subject. Below are the main processing purposes carried out by IPAC S.A.:

Website Users

- The personal data you provide through the "Contact Us" form, such as name, company name, ID or RUC number, email, phone number, and city, will be processed in order to manage your requests, respond to your inquiries, and maintain effective communication with you.
- Additionally, if you choose to contact us via WhatsApp, your data will be used to facilitate the exchange of information and respond to your messages in a personalized manner.

Job Applicants

- Reviewing applicant profiles.

- Verifying criminal, academic, and other necessary background checks.
- Conducting interviews and psychometric tests; selecting suitable candidates for specific areas.
- Storing information of non-selected candidates for possible future vacancies.
- Security and video surveillance within the facilities.

Employees

- Managing employee profiles and systems.
- Managing the employment relationship.
- Managing occupational health and safety.
- Controlling attendance and working hours.
- Security and video surveillance within the facilities.
- Logistics and administrative support.
- Regulatory compliance and certifications.
- Corporate communication.

Visitors

- Managing access and stay within the facilities.
- Verifying identity through automated reading (OCR) of the identity document, when applicable.
- Ensuring the safety of people and assets within the facilities.
- Investigating incidents when necessary.

Clients

- Establishing a contractual relationship, as well as maintaining and terminating it.
- Carrying out all necessary procedures to confirm and update client information.
- Complying with legal, regulatory, and other obligations.
- Credit assessment.
- Conducting commercial follow-up to improve service and product quality.

- Carrying out commercial campaigns to promote products and other communications to keep clients informed through: phone calls, text messages, emails, WhatsApp, or any integrated social or messaging platform.
- Managing collections and debt recovery.
- Determining the client's location and geolocation for product delivery.
- Security and video surveillance within the facilities.

Suppliers

- Managing selection and qualification processes in procurement.
- Formalizing agreements: contracts, purchase orders, agreements, etc.
- Complying with legal, contractual, and applicable regulatory obligations.
- Supporting incidents related to personal data protection.
- Managing and verifying commercial and reputational backgrounds, as well as detecting and/or preventing fraud and other illegal activities.
- Enabling physical security mechanisms at IPAC facilities.
- Managing Due Diligence processes.
- Security and video surveillance within the facilities.

7. CATEGORIES OF DATA PROCESSED

In the course of its activities, IPAC S.A. processes various types of personal data according to the established relationship with each data subject and the purposes previously informed. The following categories of data may be processed:

- Identifying data
- Family circumstances
- Academic and professional data
- Employment details
- Attendance and security control data
- Financial data
- Special categories
- Commercial information

- Judicial and administrative data

8. TYPES OF PROCESSING

IPAC S.A. performs different types of personal data processing, including collection, recording, organization, structuring, storage, modification, processing, communication, consultation, use, combination, suppression, and destruction of data.

9. LEGAL BASIS – WHY DO WE NEED YOUR DATA?

All data processing operations carried out by IPAC S.A. have a legal basis in accordance with:

Article 66, paragraph 19 of the Constitution of the Republic, which recognizes and guarantees individuals:

"19. The right to the protection of personal data, which includes access and decision over such data, as well as its corresponding protection. The collection, storage, processing, distribution, or dissemination of personal data shall require the authorization of the data subject or a legal mandate."

Article 92 of the Constitution provides:

"Every person, on their own behalf or through a legally authorized representative, has the right to know about the existence of and access documents, genetic data, data banks, or personal data files and reports that concern themselves or their property, held by public or private entities, in physical or electronic formats. They also have the right to know the use, purpose, origin, and destination of the data, and the length of time it will be stored. Persons responsible for such data may only disclose it with the authorization of the data subject or as permitted by law. The data subject has the right to free access to the data, as well as to request its update, rectification, deletion, or cancellation. In the case of sensitive data, which may only be stored with legal or personal authorization, the necessary security measures must be adopted. If a request is not answered, the data subject may appeal to a judge. Affected individuals may also claim for damages."

Article 7 of the Organic Law on Personal Data Protection (LOPD) sets out the lawful bases for data processing:

The processing shall be lawful and legitimate if it meets one of the following conditions:

1. By consent of the data subject for one or more specific purposes;
2. When performed by the data controller in compliance with a legal obligation;
3. When performed by the controller pursuant to a judicial order, and subject to the principles of the law;

4. When based on the fulfillment of a public interest mission or the exercise of official powers granted to the controller, derived from a legal norm, and subject to international human rights standards and the principles of the law;
5. For the execution of pre-contractual measures requested by the data subject or for the fulfillment of contractual obligations by the controller, processor, or a legally authorized third party;
6. To protect the vital interests of the data subject or another person, such as their life, health, or integrity;
7. For the processing of data found in publicly accessible sources;
8. To satisfy a legitimate interest of the data controller or a third party, provided that such interest does not override the fundamental rights and interests of the data subjects as protected under this law.

10. HOW LONG DO WE KEEP YOUR DATA?

Personal data will be stored only for the time necessary to fulfill the purposes for which it was collected or subsequently processed, ensuring compliance with all applicable legal regulations.

11. WHAT ARE YOUR DATA RIGHTS?

As a data subject, you have the right to exercise the following rights:

- Access
- Rectification and update
- Deletion
- Objection
- Cancellation
- Restriction of processing
- Data portability
- Not to be subject to decisions based solely on automated processing
- Any other rights provided under the Organic Law on Personal Data Protection and its Regulations.

The mechanisms implemented by IPAC S.A. to exercise these rights are free of charge and include the following steps:

1. Complete the form “PDP FOR 04 Data Subject Request.”

2. Send the form to the email address: protecciondedatospersonales@ipac-acero.com
3. Attach a copy of your valid identification document. Foreigners must attach their migration document.
4. If acting on behalf of the data subject, attach a legalized power of attorney proving such representation.

If you request rectification or update of your data, you must clearly indicate the requested modifications in the PDP FOR 04 form and attach supporting documents (e.g., birth certificate, proof of residence, etc.).

12. HOW WILL YOUR REQUEST BE HANDLED?

Once your request is received, it will be analyzed and may be answered in one of the following ways:

1. If your request is lawful and legitimate, it will be addressed within fifteen (15) calendar days, according to the right exercised.
2. If the request is incomplete or requires clarification, the Data Protection Officer may request such clarification within five (5) business days from receipt. The data subject will then have ten (10) business days from notification to complete it.
 - If the required information is not provided within this timeframe, the request may be archived, and the data subject will be informed of the reasons. This does not prevent them from submitting a new request.
3. If the request is denied, the data subject will be informed of the legal or technical reasons preventing compliance.

All responses will be communicated through the same channel by which the request was received (email).

If the PDP FOR 04 Request is accepted, third-party recipients of the data will also be informed, where applicable, to proceed accordingly (e.g., rectification, deletion, suspension, etc.).

13. DO YOU WANT TO REVOKE YOUR CONSENT?

The data subject whose personal data is processed by IPAC S.A. may request at any time the revocation of their consent. To do so, they must send a notification via email to: protecciondedatospersonales@ipac-acero.com

14. WHERE AND HOW TO FILE A COMPLAINT?

The data subject has the right to file a complaint by sending an email to: protecciondedatospersonales@ipac-acero.com

15. NATIONAL OR INTERNATIONAL TRANSFERS AND COMMUNICATIONS

IPAC S.A., as the data controller of the personal information stored in our databases, and for the purposes described in this document, may carry out national or international data transfers (when applicable) through its service providers or other companies necessary to provide its services.

16. INFORMATION SECURITY

IPAC S.A. implements technical, organizational, and legal measures to maintain the confidentiality, integrity, and availability of personal data and the systems and services used for its processing.

17. VALIDITY

This Policy is effective as of the date of its approval. Personal data that is stored, used, or transferred will remain in IPAC S.A.'s databases for as long as necessary to fulfill the purposes set out in this document or for the company to comply with its legal obligations.

IPAC S.A. reserves the right to unilaterally amend this Policy. Any changes will be communicated to users through an updated version published on our website:

[Privacy Policy](#)

IdentificationDocument	Storage Location	Classification(Preservation Method)	RetrievalRetention or Storage Time	Responsible	Access
PDP FOR 04Data Subject Request	DPD Drive	Electronic	Active: Permanent Passive: Permanent	DPD	DPD