




## CORPORATE PERSONAL DATA PROTECTION POLICY


Version	Description of changes	Approval	Validity
1.0	Initial version	Board of directors (September 30, 2025)	October 1, 2025

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## **CORPORATE PERSONAL DATA PROTECTION POLICY**

### **Introduction**

Embotelladora Andina S.A. (hereinafter “Andina”) is a franchisee of The Coca-Cola Company, whose main business activity consists of producing, bottling, marketing, and distributing products of the trademarks owned by The Coca-Cola Company, as well as marketing and distributing certain brands of other companies within specific territories in Chile and, through its subsidiary companies in other countries of the region (the “Subsidiaries”, and collectively, Andina and its Subsidiaries, the “Company”).


In the course of its business activities and the execution of its commercial, operational, and contractual processes, the Company collects and processes personal data related to such activities and processes.

Accordingly, and in compliance with the provisions of the various laws and regulations establishing a legal framework for the protection of personal data applicable to the Company (the “Personal Data Protection Regulations”), this Corporate Personal Data Protection Policy (the “Policy”) is hereby established.

### **Purpose and scope**

The purpose of this Policy is to set forth the general principles and guidelines that shall govern the behavior of all employees, suppliers, contractors, subcontractors, business partners, and, in general, any individual or legal entity performing functions or carrying out activities within the framework of the Company’s operations, in order to: i) require and promote compliance with the Personal Data Protection Regulations in force in each of the countries in which the Company operates; ii) foster a culture of Personal Data protection; iii) safeguard the rights of the holders of the Personal Data processed by the Company; and iv) promote the secure management of Personal Data.

For the purposes of this Policy, personal data shall mean any information relating to a person that the applicable Personal Data Protection Regulations of the respective country define as such (“Personal Data”). Likewise, processing shall be understood as any operation or set of operations performed upon Personal Data, whether or not by automated means, that allows, in any way, the collection, processing, storage, communication, transmission, or use of Personal Data or sets of Personal Data (the “Processing”).

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This Policy shall apply to all Company personnel, including all workers, employees, executives, and officers, in all the countries where it operates. Likewise, Andina shall promote that suppliers, contractors, subcontractors, or other third parties participating in the Company's operations adhere to the standards, guidelines, and principles established herein.

### **General principles for Personal Data Processing**

In processing Personal Data, the Company shall observe the following general principles:

a. **Principle of Lawfulness, Fairness, and Purpose**

The Company shall process the Personal Data to which it has access in a lawful and fair manner, in compliance with applicable Personal Data Protection Regulations, internal policies, and any privacy and data protection commitments it has voluntarily adopted.

The Company shall only collect and process Personal Data for specific and lawful purposes.


b. **Principle of Proportionality**

The Company shall process only those Personal Data that are necessary, adequate, and relevant in relation to the purposes of the Processing. Likewise, it shall retain Personal Data only for the period necessary to fulfill such purposes, after which it shall take the necessary measures for their deletion or destruction, in accordance with the applicable Personal Data Protection Regulations.

c. **Principle of Data Quality**

The Company shall only process Personal Data that are accurate and complete and shall adopt the necessary mechanisms to ensure that such data remain up to date.

d. **Principle of Accountability**

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The entities of the Company involved in Personal Data Processing shall be legally responsible for compliance with the Personal Data Protection Regulations and with this Policy.

e. Principle of Security

The Company shall adopt adequate and reasonable standards necessary to guarantee the security of the Personal Data it processes and to mitigate the risks of unauthorized or unlawful Processing, as well as accidental loss, leakage, destruction, or damage.

f. Principle of Transparency and Information

The Company shall inform data subjects about the Processing activities carried out with respect to their Personal Data, and the purposes thereof, in a clear, precise, and permanently accessible manner. Likewise, it shall provide the necessary information for the exercise of the rights granted to data subjects under the applicable Personal Data Protection Regulations of each country. This shall be done, among other normative instruments, through the Privacy Policies issued by the Company.

g. Principle of Confidentiality


The Company shall establish appropriate controls and measures to preserve the secrecy and confidentiality of the Personal Data it processes.

**Regulatory compliance**

All Processing of Personal Data carried out by the Company shall be conducted in accordance with the Personal Data Protection Regulations applicable to the corresponding territory. The Company shall ensure proper compliance throughout the entire lifecycle of the Processing.

**General guidelines regarding Personal Data Processing**

In accordance with the aforementioned principles, the Company shall adhere to the following guidelines:

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a. Implementation of Compliance Programs

Andina and each of its Subsidiaries shall implement compliance programs in the area of Personal Data protection, which shall incorporate the general objectives and principles established in this Policy.

Such programs shall include elements that enable: i) the establishment, communication, promotion, and guidance of the expected behaviors of the Company's employees and suppliers regarding the protection of Personal Data; ii) the identification, management, and continuous assessment of risks associated with Personal Data Processing activities; iii) the designation of a staff member responsible for the implementation, management, and maintenance of such programs; and iv) the allocation of sufficient financial and human resources for the proper implementation of each program.

b. Privacy by Design and by Default


The Company shall implement appropriate technical and organizational measures to comply with the duty of protecting Personal Data from the design stage, both prior to and during their Processing. Likewise, it shall adopt measures that, by default, ensure that only specific and necessary Personal Data are processed to fulfill the corresponding purposes.

**Sensitive data**

Without prejudice to the definitions established by the applicable Personal Data Protection Regulations in each jurisdiction, Sensitive Data refers to information which, by its nature, may have significant implications for the privacy, intimacy, dignity, and honor of data subjects and, therefore, requires special care when processed.

As a general rule, this category includes data revealing aspects such as racial or ethnic origin, political opinions, religious beliefs, trade union membership, health data, sexual life, and biometric data, among others.

Given these characteristics, the Company shall refrain from processing such data unless it is strictly necessary and, in cases where it is legally required to do so, it shall ensure that such processing protects the privacy, intimacy, dignity, and honor of individuals at all times.

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### **Information and transparency**

The Company shall ensure adequate, clear, and timely access to essential information regarding the Personal Data Processing carried out within the framework of its operations, through the drafting, publication, and regular updating of its privacy policies.

A privacy policy is a key document that outlines the practices and procedures an organization follows to manage and protect the Personal Data it collects, stores, organizes, analyzes, and generally processes in the course of its operations. Each privacy policy must specify how such data are collected, used, stored, and, in certain circumstances, shared. It must also explain the rights of the individuals whose data are collected and how they may exercise those rights.


Essentially, a privacy policy serves as a statement of transparency between the organization and individuals, ensuring that Personal Data are handled with integrity and respect, while also complying with applicable privacy laws and regulations. This instrument is fundamental for building trust and assuring stakeholders that their data are safely managed.

Andina and each of its Subsidiaries shall issue their corresponding Privacy Policies. The content of each shall depend on what is established by the applicable Personal Data Protection Regulations in each country.

### **Confidentiality of Personal Data**

The Company has a duty of confidentiality regarding the Personal Data it processes in the course of its operations. This duty extends to its employees and to all persons who carry out Processing activities under its responsibility.

The Company shall fulfill its duty of secrecy or confidentiality in accordance with the applicable Personal Data Protection Regulations of the respective jurisdiction.

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## **Security of Personal Data**

### **Security measures**

The Company has a Corporate Systems and Technology Management Department, which shall define, design, implement, and maintain the appropriate technical and organizational security measures to ensure that the Personal Data Processing complies with the standards required by the applicable Personal Data Protection Regulations.

To this end, the Company maintains, among others, a Corporate Cybersecurity and Information Security Policy, kept up to date in accordance with current legislation, and a Chief Information Security Officer (CISO) who acts as the person responsible for cybersecurity and information security.

### **Security incident management**

Upon detection of any breach of security measures affecting Personal Data processed by the Company, the Information Security and Cybersecurity teams must be immediately informed so that the incident can be appropriately managed in accordance with established corporate procedures.


The management of such incidents shall include, where applicable, notification to the competent authorities and to the affected data subjects, in accordance with the applicable Personal Data Protection Regulations.

### **Correlation among corporate instruments**

The Company shall ensure compliance with the security standards established by the applicable Personal Data Protection Regulations through the drafting, implementation, or adaptation of various corporate instruments, such as those related to information security and cybersecurity, specific privacy policies for certain areas of processing, procedures, protocols, or any other internal regulations.

These instruments shall aim to ensure a coordinated and comprehensive protection of the security, confidentiality, integrity, and availability of Personal Data throughout all Company operations.



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## **Transfer of Personal Data**

### **Communication of Personal Data to an agent or processor**

The engagement of service providers who process Personal Data for which the Company acts as controller, or as an agent of another controller, shall be duly regulated and shall always comply with the applicable Personal Data Protection Regulations to ensure its legality.

### **Communication of Personal Data from a third-party controller to the Company acting as processor**

When a third party transfers Personal Data to the Company and the latter receives such data in its capacity as a processor, full compliance with the applicable Personal Data Protection Regulations shall be ensured under the same terms described in the preceding section.

### **Transfer of Personal Data to another controller**


Any transfer of Personal Data carried out by the Company shall be made in writing and shall comply, at a minimum, with all the requirements established by the applicable Personal Data Protection Regulations.

### **Transfer of Personal Data from a third party to the Company**

If a third party transfers Personal Data to the Company and the Company receives such data as a controller, the necessary measures shall be taken to ensure that the Company can lawfully use said Personal Data, fully complying with the applicable Personal Data Protection Regulations.

### **International transfer of Personal Data**

The transfer of Personal Data to a third party located outside their country of origin must strictly comply with the applicable Personal Data Protection Regulations, both in the country of origin and in the destination country.

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### **Rights of data subjects**

The Company shall inform data subjects of the rights to which they are entitled under the applicable Personal Data Protection Regulations in each case.

The Company shall identify the rights recognized in each jurisdiction and implement accessible, clear, and effective mechanisms to facilitate their exercise.

The exercise of such rights is not absolute and must be assessed on a case-by-case basis to determine whether a particular request should be accepted, rejected, or limited.

### **Training and awareness**

The Company shall periodically implement a training plan aimed at fostering and consolidating a culture of Personal Data protection.


Such activities may be of a general nature, directed at all Company personnel (and, if deemed appropriate, to directors, suppliers, and/or other individuals or legal entities processing Personal Data on behalf of the Company), or specific, focused on areas and individuals whose activities require deeper knowledge of the subject.

### **Use of artificial intelligence (AI) and Personal Data protection**

The Company shall promote, monitor, and ensure that any Processing of Personal Data carried out through artificial intelligence (AI) complies with this Policy, the Corporate Artificial Intelligence Policy, and the applicable Data Protection Regulations in each country.

### **Compliance with the Policy**

All workers, employees, executives, and officers of the Company, as well as its suppliers, contractors, subcontractors, business partners, and, in general, any individual or legal entity performing functions or activities within the framework of the Company's operations, are responsible for the faithful

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compliance with the Personal Data Protection Regulations, this Policy, and any internal regulations on Personal Data protection.

Furthermore, the Data Protection Officer (DPO) of Andina and each of its Subsidiaries shall ensure faithful and timely compliance with this Policy and shall adopt the necessary measures in case any breach is detected.

### **Breach of this Policy**

Any violation of this Policy may result in disciplinary action as provided in Andina's Internal Rules on Order, Hygiene, and Safety or the corresponding regulations in each country.

In the case of external entities (e.g., service providers, contractors, subcontractors, among others), the sanction mechanisms provided in the respective contracts with the Company shall apply.

If the seriousness of the breach so warrants, contract termination and the corresponding claim for damages may be considered.


Processing Personal Data without complying with the applicable Personal Data Protection Regulations shall be deemed a very serious violation of this Policy.

### **Disclosure mechanisms**

This Policy shall be made available to interested parties on the Company's website: [www.koandina.com](http://www.koandina.com)

### **Validity**

The guidelines established in this Policy shall become effective on October 1, 2025, and shall remain in force until modified by resolution of the Board of Directors.

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### **Review and supervision**

Compliance with this Policy shall be periodically evaluated and supervised by the Company.