

PERSONAL DATA PROCESSING POLICY

GALAPAGOS NATURAL LIFE

Galapagos Natural Life maintains a firm and ongoing commitment to safeguarding the privacy and protecting the personal data of its users and clients. In fulfillment of this responsibility, we have developed this Privacy Policy, which constitutes the internal regulatory framework governing our information processing practices, always in strict compliance with the Organic Law on the Protection of Personal Data and other applicable Ecuadorian legislation.

This policy reflects the value the Company places on its users, guaranteeing the security, confidentiality and ethical use of their personal information.

SCOPE AND ACCEPTANCE

When you access our different Galapagos Natural Life services such as:

<https://www.galapagoslasm.net/>, <https://galapagosnaturallife.com>,
<https://galapagosdivingtours.net> and <https://luxurycruiseagalapagos.com/> ; call centers, email communications, visits to our headquarters, and any other interaction channel, the Company collects personal data for specific purposes detailed below.

The primary purpose of this document is to provide you with a clear and detailed understanding of how your information is managed. The Company reserves the right to update or modify these terms at any time to adapt them to new legal requirements or service improvements, and undertakes to notify you of any significant changes through the appropriate channels. By accepting this Policy, you expressly authorize the processing of your data under the conditions stipulated herein.

GENERAL PRINCIPLES OF DATA PROTECTION:

Information management at Galapagos Natural Life is based on the following ethical and legal pillars, which guarantee the proper and secure handling of your personal data:

- **Legality:** The processing of personal data is carried out under strict compliance with the current regulatory hierarchy, observing the precepts of the Constitution of the Republic of Ecuador, the international treaties signed by the country, the Organic Law on the Protection of Personal Data, its respective Regulations and all related legal provisions that protect the fundamental rights of the data subject.
- **Loyalty:** The collection and subsequent use of information are carried out in absolute good faith, ensuring that the processing is consistent with the provisions of this Policy. Under no circumstances will the data be processed for illicit, unfair, or contrary purposes to the interests of the data subject.

- **Transparency:** We guarantee that any process related to the management of your data is clear and accessible. Under this principle, you can easily access information about how and why your personal data is being processed whenever you request it.
- **Minimization and Relevance:** The Company applies a data economy criterion, collecting only the information that is strictly necessary, relevant and proportionate to the achievement of the tourism and operational purposes detailed in this document
- **Quality:** To ensure the effectiveness of reservations and tourism services, the data processed must be accurate, complete, and up-to-date. Therefore, the Company reserves the right to implement verification mechanisms to confirm the authenticity of the information provided by the data subject.
- **Limited Retention:** Personal data will be kept in our records only for the period necessary to fulfill the purpose for which it was collected or while legal retention obligations persist. Once the contractual relationship or the legal retention period has ended, the information will be securely deleted or subjected to irreversible anonymization processes.
- **Security and Proactive Responsibility:** We adopt security protocols based on international standards and cutting-edge technical measures to mitigate risks of loss, alteration, or unauthorized access. We are committed to continuous technological updates to ensure the resilience of our information systems.

BASIC DEFINITIONS:

To facilitate understanding of this policy, as well as to establish the limits of our management and the scope of your rights, the following fundamental terms are defined:

- **Personal Data:** Refers to any type of information that, directly or indirectly, allows for the identification of a natural person.
- **Data Subject:** The natural person to whom the personal data being processed belongs and who enjoys the legal protection established in current regulations.
- **Processing:** Any operation or set of technical procedures applied to personal information, such as collection, recording, organization, storage, custody, adaptation, modification, deletion, among other management processes.
- **Data Controller:** The natural or legal person who, in the exercise of their functions, has the authority to decide on the purpose and scope of the processing of data subjects' personal data.
- **Data Processor:** A natural person responsible for processing personal data on behalf of and under the direction of the Data Controller.

- **Consent:** The freely given, specific, and informed consent by which the Data Subject authorizes the Data Controller to process their personal information.
- **Anonymization:** The application of technical measures aimed at removing the identifying link of data subjects, so that the resulting information cannot be reversibly linked to a natural person.

RIGHTS OF GALAPAGOS NATURAL LIFE USERS

As the data subject, the Law grants you the following rights, which you can exercise with respect to the Company, to maintain control over your data:

1. Right of Access: To consult what data we hold about you, how we use it, and its origin.
2. Right of Rectification: To request the immediate correction of any inaccurate, incomplete, or outdated information.
3. Right of Erasure or Blocking: To request the deletion of data you consider unnecessary or that is not being processed in accordance with the law.
4. Right to Information: To know which institutions or third parties have had access to your information through the Company.
5. Right of Withdrawal: To withdraw your consent for the processing of your data at any time, being aware in advance of the possible consequences of such action.

PROCESSING OF PERSONAL DATA

To offer a personalized and safe travel experience, Galapagos Natural Life classifies and processes the following data:

- **Personal Identification Data:** Includes names, surnames, identification numbers (national ID, passport, RUC), telephone numbers, email addresses, date of birth, and nationality.
- **Sensitive Data:** Information requiring enhanced protection, such as gender, interests, physical characteristics, immigration history, photographs, and fingerprints.
- **Financial and Credit Data:** Information necessary to verify creditworthiness and process payments, such as account numbers, credit/debit card details, security codes, and expiration dates.

- **Health and Vulnerable Groups Data:** Information on disabilities, physical or mental medical conditions, and data concerning children and adolescents, which always requires authorization from a legal representative or guardian.

The information collected by Galapagos Natural Life is primarily for the management, confirmation, and execution of tourism services. To guarantee the security of transactions and the integrity of our operations, the Company reserves the right to verify the accuracy of the data provided through inquiries with public institutions or credit bureaus. The user grants their express authorization for this verification by accepting this policy.

All information provided will be managed under strict confidentiality protocols, ensuring compliance with current legal regulations. While the user has the right to omit providing certain personal data, it is important to note that this information is mandatory and essential for the effective processing of tourism reservations and complementary services.

In cases where a user makes a reservation on behalf of a third party, the user assumes responsibility for having obtained the prior and informed consent of the data subject before providing their data to the Company.

Likewise, with regard to the processing of data of children or adolescents, the user who provides such information declares and guarantees that he has the legal authorization of at least one of the parents or the legal guardian of the minor, accepting on his behalf the terms and conditions of this Privacy Policy.

PURPOSE OF DATA PROCESSING

Galapagos Natural Life will process the personal information of its users to ensure excellence in the provision of its services, allocating said data to the following specific purposes:

- **Comprehensive Reservation Management and Tax Compliance:** The Company will use your data for the effective management of requested tourist reservations, the execution of financial transactions initiated by the data subject, and the processing of invoices and tax documentation required by current tax regulations.
- **Commercial and Advertising Communications:** In order to keep you informed about our experiences, promotions, and exclusive services, Galapagos Natural Life may send advertising material and offers that it believes may be of interest to you. These communications may be managed directly or through strategic alliances with third parties, using official channels such as email, text messaging, or telephone contact.
- **Attention to and Guarantee of Data Subject Rights:** We are committed to using your information to facilitate the exercise of your legal rights. This includes the efficient management of your requests, the resolution of concerns, and personalized attention to your comments or information requests.

- **Direct Contact Channels:** To ensure efficient and timely communication, the Company will use the contact information provided (telephone, email) to interact through instant messaging services such as WhatsApp or other similar digital platforms.
- **Financial Information Management and Supplier Relations:** Credit and payment information will be used exclusively for processing travel reservations. This involves the technical transfer of information to end service providers such as airlines, hotels, or cruise lines for payment processing, validation, and any administrative tasks necessary to ensure the effective delivery of the contracted tourism service.

PROCESSING OF BROWSING DATA AND COOKIES

Browsing information comprises technical data collected automatically during user interaction with our website, without requiring prior identification by the user. This category of data includes, among other things, IP address, cookie usage, browser specifications, network type, and the unique identifier of the access device.

The primary purpose of processing this information is to analyze user behavior within the platform, allowing Galapagos Natural Life to monitor session durations, detect potential system errors, and optimize the browsing experience to offer a more efficient and personalized digital service.

Retention Period: The collected technical data will be stored in our systems until the user exercises their right to erasure, or until the information reaches its technological expiration date. In compliance with data minimization principles, the retention period for these records will not exceed a maximum of 24 months.

CONSENT, SECURITY AND INFORMATION LIFECYCLE

Authorization and Consent Mechanisms: Galapagos Natural Life will obtain authorization for the processing of personal data explicitly or implicitly, always ensuring that the data subject is duly informed. For this purpose, the Company provides various data collection mechanisms, such as digital forms on our website, manual registration platforms, messaging tools, or QR codes designed to facilitate the submission of informed consent.

Likewise, consent will be understood to exist when the user actively uses our online tools to manage reservations, contract specific services, or during the operational coordination of their travel experiences, always within the purposes outlined in this policy.

Security and Protection Protocols: To guarantee the integrity of information, the Company protects data through the use of cloud servers with advanced encryption technology and segmented permission systems. These measures comply with international information security standards, ensuring a reliable environment for the execution of all our tourism operations.

Retention and Deletion Periods: Personal data will be stored only for the time strictly necessary for the provision of the service. Once the contractual relationship has ended, and provided there are no current legal obligations before the Ecuadorian authorities for the defense of claims, the information will be deleted or anonymized. The retention period will be determined on a case-by-case basis, considering the recurrence and frequency of consumption of each client, in strict compliance with legal retention periods.

Rights Management and Information Updates: The data subject has full freedom to consult their personal information through our official channels, whether by electronic communication or telephone. The Company is obligated to rectify, update, and guarantee the accuracy of the data when the data subject so requests.

Procedure for Data Deletion: If the data subject believes that their data is being processed contrary to the principles of this policy, or if it is no longer necessary for the contracted purposes, they may request its deletion by sending a written request via email. Galapagos Natural Life undertakes to carry out the deletion, rendering illegible, or anonymization of the information, in whole or in part, under international technical standards, within a maximum period of 15 days from receipt of the request.

PRIVACY CULTURE AND CONTACT INFORMATION

Internal Confidentiality Commitment: At Galapagos Natural Life, data protection is a fundamental pillar of our organizational culture. Therefore, all employees of the Company are subject to strict confidentiality agreements that ensure the responsible and ethical handling of the information under their care.

Likewise, our Information Technology (IT) department has the authority to conduct periodic reviews to verify compliance with security standards and the appropriate handling of data, thus guaranteeing the resilience of our systems against any risk.

Identification of the Data Controller: In compliance with current Ecuadorian regulations and to guarantee transparency in our management, the Company's Legal Representative is designated as responsible for the custody and administration of your data.

To exercise your rights, make inquiries, or submit requests related to your privacy, you may contact us through the following official channels:

- **Data Controller: Legal Representative of Galapagos Natural Life.**
- **Address: Joaquín Pinto E8-64 & Av. 6 de Diciembre**
- **Email: reservaciones@galapagosnaturallife.com**
- **Phone: +593 98457 9397**