

PRIVACY AND DATA PROTECTION POLICIES			
	Last Review Date: 12/10/2025	Reviewed: CTO Noblesse	Code: NOB-PP-001

1. INITIAL STATEMENT

NOBLESSE (hereinafter, "NOBLESSE," "we," or "our"), in its unwavering commitment to the protection of privacy and personal data, establishes this Privacy Policy in accordance with the highest international standards and the current Chilean regulatory framework. This document constitutes the regulatory framework that governs the processing of personal data through our website www.noblesse.cl and in the development of all our commercial and professional activities.

1.1. Identification of the Data Controller

Business Name: Noblesse Consulting

Email: legal@noblesse.cl

1.2. Scope of Application

This policy applies to all personal data processed by NOBLESSE in its capacity as data controller, including, but not limited to: website visitors, current and potential customers, suppliers, and any natural person whose data is processed in the development of our business activities.

2. GUIDING PRINCIPLES OF PROCESSING

We are governed by fundamental principles that guarantee the ethical and legal processing of your personal data:

2.1. Principle of Lawfulness, Fairness, and Transparency

We collect and process your data lawfully, fairly, and transparently, providing clear and accessible information about the purposes of the processing and the rights you have as the data subject.

2.2. Principle of Purpose Limitation

Personal data is collected for specific, explicit, and legitimate purposes and is not subsequently processed in a manner incompatible with those purposes, in accordance with data protection regulations.

2.3. Principle of Data Minimization

We only collect personal data that is adequate, relevant, and limited to what is necessary in relation to the purposes for which it is processed, avoiding the collection of excessive or irrelevant information.

2.4. Accuracy Principle

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We keep your personal data accurate and up-to-date, implementing reasonable measures to ensure the rectification or deletion of inaccurate data in relation to the purposes of processing.

2.5. Retention Period Limitation Principle

We retain personal data for the time strictly necessary to fulfill the purposes of processing, establishing specific retention periods for each category of data.

2.6. Integrity and Confidentiality Principle

We implement appropriate technical and organizational security measures to ensure the protection of your personal data against unauthorized or unlawful processing, accidental loss, destruction, or damage.

3. CATEGORIES OF PERSONAL DATA PROCESSED

3.1. Identification and Contact Data

We collect personal identification information, including full name, identification document, professional contact information (corporate email, telephone numbers), current position, and the company you represent. This data is essential for establishing business relationships and providing our professional services.

3.2. Professional and Business Data

We process information related to your professional background, industry experience, specific business needs, and your organization's strategic objectives. This data allows us to offer customized, high-value solutions.

3.3. Financial and Transactional Data

To manage contractual relationships, we process information necessary for billing, bank details for transfers, commercial transaction history, and records of compliance with mutual financial obligations.

3.4. Technical and Navigational Data

Through our website, we automatically collect technical data, including IP addresses, browser type and version, time zone setting, operating system, device platform, and other technology on the device used to access our site.

3.5. Marketing and Communications Data

We keep records of your communication preferences, newsletter subscriptions, event attendance, and responses to marketing campaigns, always based on your explicit consent when required.

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4. COOKIES AND TRACKING TECHNOLOGIES

4.1. Definition and Purpose of Cookies

Cookies are small text files that are stored on your device when you visit our website. We implement these technologies to ensure the technical functioning of the website, analyze browsing behavior, and personalize your user experience, always within the framework of the consent required by applicable regulations.

4.2. Classification of Cookies Used

4.2.1. Essential Technical Cookies

These cookies are strictly necessary for the basic functioning of the website, enabling navigation functions and access to secure areas.

Without these cookies, the site cannot operate properly. They include session, security, and load balancing cookies.

4.2.2. Analytics and Performance Cookies

We use analytics cookies to understand how visitors interact with our website by collecting information anonymously. This data allows us to continually improve the functionality and user experience by measuring the performance of different sections of the site.

4.2.3. Functionality Cookies

These cookies allow the website to remember choices you make (such as your username, language, or region) and provide enhanced, more personalized features. They may be set by us or by third-party providers whose services we have added to our pages.

4.3. Cookie Consent Management

We provide a comprehensive cookie management system that allows you to:

- Grant selective consent by cookie category
- Revoke consent at any time
- Access a detailed configuration panel
- Delete existing cookies through your browser

Consent is recorded in an auditable manner and maintained for a period of 12 months, after which renewal will be requested.

4.4. Related Technologies

In addition to traditional cookies, we use similar technologies such as:

- Local Storage: To persistently store user preferences

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- Session Storage: For temporary browsing data
- Tracking APIs: For integration with analytics platforms

5. LEGAL BASIS AND PURPOSES OF PROCESSING

5.1. Performance of Contracts and Pre-contractual Relationships

We process your personal data when necessary for the performance of professional services contracts, including the management of commercial proposals, the provision of strategic consulting services, invoicing, and compliance with contractual obligations.

5.2. Explicit Consent

For certain purposes, such as sending commercial communications, direct marketing, and the use of non-essential cookies, we require your explicit consent, which you can withdraw at any time through the established channels.

5.3. Legitimate Interest

We base certain processing operations on our legitimate interest, provided that your fundamental rights and freedoms do not prevail. This includes:

- Improving our services and developing products
- Fraud prevention and ensuring security
- Business analysis and internal reporting
- Managing complaints and queries

5.4. Compliance with Legal Obligations

We process personal data when necessary for compliance with legal and regulatory obligations, including retaining accounting records, responding to court orders, and complying with industry regulations.

6. INTERNATIONAL DATA TRANSFERS

6.1 Applicable Safeguards

All international transfers are carried out under appropriate safeguards, including:

- Standard contractual clauses approved by the European Commission
- Certifications from recognized privacy mechanisms
- International transfer impact assessments
- Additional security measures when necessary

7. RETENTION OF PERSONAL DATA

7.1. Retention Criteria

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We establish specific retention periods based on:

- Ongoing contractual and business needs
- Applicable legal and regulatory requirements
- Limitation periods for legal actions
- Legitimate business purposes

7.2. Specific Periods by Category

- Active customer data: For the duration of the contract plus 5 years
- Prospect data: 2 years from the last contact
- Financial and accounting data: 6 years in accordance with tax legislation
- Consent logs: 5 years from the last update
- Browsing data and cookies: Depending on the specific settings of each cookie

7.3. Deletion Procedure

We implement secure deletion procedures that include:

- Data anonymization for statistical purposes
- Secure destruction of physical media
- Irreversible technical deletion of digital data
- Certification of destruction processes

8. RIGHTS OF SUBJECTS

8.1. Catalog of Rights

As the subject of personal data, you have the right to:

8.1.1. Right of Access

Obtain confirmation as to whether we are processing your personal data and access it, including information about the purposes of the processing, categories of data concerned, and data recipients.

8.1.2. Right to Rectification

Request rectification of personal data

is inaccurate or incomplete, including through a supplementary declaration that takes into account the purposes of the processing.

8.1.3. Right to Erasure (To Be Forgotten)

Request the erasure of your personal data when it is no longer necessary for the purposes for which it was collected, withdraw your consent, or legitimately object to the processing.

8.1.4. Right to Restriction of Processing

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Obtain restriction on the processing of your data when you contest its accuracy, the processing is unlawful, or we no longer need the data for the purposes of the processing.

8.1.5. Right to Data Portability

Receive the personal data you have provided to us in a structured, commonly used, and machine-readable format and transmit it to another controller without hindrance.

8.1.6. Right to Object

Object at any time, for reasons related to your particular situation, to the processing of personal data based on legitimate interest.

8.2. Exercise of Rights

To exercise your rights, you can contact us via:

Electronic Form: Available at www.noblesse.cl

Email: info@noblesse.cl

8.3. Response Times

We will process all requests within the legal deadline of 10 business days, which may be extended by an additional 10 days in complex cases, duly notifying you of any extension.

9. SECURITY MEASURES

9.1. Risk-Based Approach

We implement security measures proportional to the risk posed by the processing, considering:

- Nature, scope, context, and purposes of the processing
- Risks of varying likelihood and severity for rights
- State of the art and costs of implementation

9.2. Technical Controls

- Encryption of data at rest and in transit
- Role-based access control systems
- Intrusion prevention and detection tools
- Secure data transfer protocols
- Backups and recovery plans

9.3. Organizational Controls

- Internal information security policies
- Confidentiality agreements with staff
- Training and awareness programs
- Incident management procedures

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- Periodic security audits

10. SECURITY INCIDENT MANAGEMENT

10.1. Notification Procedure

We have a documented procedure for managing security incidents, which includes:

- Immediate detection and classification of the incident
- Containment and eradication of the breach
- Notification to the competent authority within [72 hours]
- Communication to those affected when there is a high risk

10.2. Corrective Measures

After any incident, we implement:

- Root cause analysis
- Corrective and preventive measures
- Updating security controls
- Communication of lessons learned

11. POLICY MODIFICATIONS

11.1. Update Procedure

We reserve the right to modify this Privacy Policy to adapt it to legislative, jurisprudential, or business developments. Modifications will be notified by:

- Publication on our website 15 days in advance
- Direct communication to active customers
- Featured banner on the home page

11.2. Consent to Modifications

Continued use of our services after any modifications become effective constitutes acceptance of the new terms. For substantial changes that require additional consent, we will expressly request it.

12. CONTACT INFORMATION

12.1. Communication Channels

For any questions related to this Privacy Policy or the processing of your personal data, you can contact us through:

- Data Protection Officer (DPO): legal@noblessepartners.com
- Customer Service: info@noblessepartners.com

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12.2. Supervisory Authority

If you believe your rights have been violated, you have the right to file a complaint with the competent data protection supervisory authority.

13. GLOSSARY OF TERMS

- Personal Data: Any information concerning an identified or identifiable natural person.
- Processing: Any operation or set of operations involving personal data.
- Data Controller: NOBLESSE, which decides on the purpose and means of processing.
- Data Processor: Third party that processes personal data on behalf of the controller.
- Data Subject: Natural person to whom the personal data pertains.

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DECLARATION OF COMPLIANCE

NOBLESSE certifies that this Privacy Policy complies with the provisions of Law No. 19,628 on the Protection of Privacy, Law No. 21,096 on the Protection of Personal Data, and the principles established in the General Data Protection Regulation (GDPR) of the European Union.