

## DATA PROTECTION OFFICER POLICY

Effective date (v.0): June 18, 2021

Update date (v.1): January 12, 2023

This policy identifies and sets forth the obligations and responsibilities of the Data Protection Officer (“DPO”) appointed by GlobeNet which will act as a channel of communication between GlobeNet, the Data Subjects, and the Authorities of Data Protection. This policy does not create a contract between GlobeNet and the appointed DPO.

### 1. Definitions: as used in this policy

- 1.1 The terms “Controller”, “Data Subject”, “Data Protection Officer”, “Processor”, “Personal Data” shall have the same meaning as in the applicable law according to the jurisdiction in all countries that GlobeNet has operations.

### 2. Responsibilities of Controller

2.1 *Appointment*: GlobeNet shall appoint a DPO to serve as a channel of communication between GlobeNet, the Data Subjects, and the Data Protection Authority.

2.2 *Independence*: To ensure the independence of the DPO, GlobeNet shall not instruct the appointed DPO on how to conduct the activities of the office and will ensure the DPO is not dismissed or penalized for performing the activities of the office.

2.3 *Involvement*: GlobeNet shall involve the DPO in all Personal Data protection matters. In support of this objective, GlobeNet shall facilitate communication with and involvement of the DPO in issues related to Personal Data protection.

2.4 *Support*: GlobeNet shall provide to the DPO the necessary support required to accomplish the activities of the office, including providing access to Personal Data and processing operations, providing a data protection team or other support personnel, and assistance to maintain expert knowledge of topics and issues related to Personal Data protection.

2.5 *Conflicts of Interest*: GlobeNet shall ensure the DPO has no conflict of interests regarding the activities of the office and is not positioned to determine the purposes or means of processing Personal Data.

### 3. Activities of the DPO:

3.1 *Independence*: In performing the duties set forth by the applicable law according to the jurisdiction in all countries that GlobeNet has operation.

3.2 *Reporting*: the DPO shall report to the General Counsel for GlobeNet.

3.3 *Compliance*: The DPO shall support GlobeNet's compliance with the applicable law.

3.4 *Concerning Data Subjects*: The DPO shall accept complaints and communications from Data Subjects, provide explanations, and adopt relevant measures consistent with GlobeNet's obligations under the applicable law.

3.5 *Concerning*: The DPO shall receive communications from the investigative authority and adopt relevant measures consistent with those communications as they pertain to GlobeNet's obligations under the applicable laws.

3.6 *Concerning GlobeNet*: The DPO shall orient GlobeNet's employees and contractors regarding practices to be taken in relation to Personal Data protection. The DPO shall be a point of contact for internal inquiries and communications regarding data protection. In coordination with General Counsel, the DPO shall advise the Controller and Processors regarding their obligations and rights under the applicable law.

3.7 *Concerning Other Duties*: The DPO shall carry out other duties as determined by GlobeNet or as set forth in eventual complementary rules promulgated by the local authorities.

3.8 *Professional Secrecy*: The DPO shall exercise professional secrecy in conducting the activities of the office.

#### 4. Appointed Data Protection Officer.

The following individual has been appointed as GlobeNet's DPO

Name: Mr. Fernando Albert Bousso

Contact Information:

[dpo@globenet.net](mailto:dpo@globenet.net)

Date of Appointment: January 12, 2023.

The DPO acknowledges that this information may be publicly disclosed on GlobeNet's website.