

PRIVACY AND DATA PROTECTION POLICY

(hereinafter the "Policy")

Estación 401 S.A., legal identification number **3-101-643023** domiciled in San Jose, Santa Ana, Oficentro Forum I, building K, first floor (hereinafter "**OXIGENO**"), in accordance with the Law of Protection of the Person on the use of their personal data N° 8968 (hereinafter, the "LPD") and its Regulation, informs you of the existence of a Database of Personal Character created by the Responsible, and called " **OXIGENO Database**"

PURPOSE OF DATA COLLECTION

The data that the Registered User provides to OXIGENO is collected for informational, contact, research and commercial prospecting purposes. This information will be treated with the reservation, confidentiality and security stipulated by the legislation relative to this matter.

DEFINITIONS

App: OXIGENO App.

Website: OXIGENO Website www.oxigeno.com

OXIGENO: Human Playground OXIGENO, is a unique and interactive space that integrates the community, entertainment, sports, gastronomy, shopping and green areas.

User: You with the simple download and use of the App or access to the Website.

Registered User: You if you create an account in the App or the Website.

Database: Set of personal data of the Users duly organized and used for the purposes that OXIGENO informs you in the "Privacy and Data Protection Policy"

ACCEPTANCE OF THIS POLICY

The User approves this Policy by checking the box next to "I have read and accept the privacy and data protection policy" found in the data compilation forms, which is an essential requirement to be able to finish the process and become a Registered User. Therefore, we suggest to the User to read this Policy carefully before checking the box mentioned above.

OF THE IDENTITY OF THE REGISTERED USER AND ACCURACY OF THE INFORMATION PROVIDED

The Registered User declares to be who he claims to be and that he knows the legal consequences of acting as someone else, as well as that the information introduced in the **OXIGENO** App and Website is accurate, and that he assumes the duty to comply with the necessary information updates to keep it clear and accurate at all times. In case of missing this obligation to update, the Registered User releases **OXIGENO** from any legal consequence regarding these elements of authenticity and accuracy corresponding to the principle of quality of the information established in the national legislation.

On the other hand, if **OXIGENO** comes to detect that you have entered information in any manner contrary to what is indicated in the previous paragraph, **OXIGENO** will proceed immediately to terminate any rights you have obtained regarding the App and Website and resign the relationship with you at the moment. All of the foregoing, without prejudice to the possibility of initiating legal actions that are necessary to protect the rights of **OXIGENO** or any third party that has suffered any damage as a result of the violation of the user.

OF THE COLLECTION OF OTHER INFORMATION IN THE APP AND WEB PAGE

Apart from the information that you provide us in the registry as a Registered User, **OXIGENO** can gather other information through surveys, interviews or questionnaires that are sent to the Registered User, in addition to being warned that **OXIGENO** uses automated systems for analyzing Registered User traffic that gather information about your experience in the use of our App and Website, this is done with the objective of providing a secure service to the Registered User; nevertheless, the Registered User is guaranteed that the information gathered in accordance with this paragraph is absolutely private and for the use of **OXIGENO**, access to third parties will never be granted nor will this information be transferred.

OXIGENO does not request information of a financial type or identified as "sensitive" by the data protection regulation of the Registered Users of the App or Website, therefore, if you receive a communication identified as " **OXIGENO** " requiring this type of information, you are requested to immediately communicate to **OXIGENO** at the addresses indicated in this document and do not respond to the sender of said messages.

OF THE QUALITY OF DATA AND REVOCATION OF CONSENT

The data obtained is appropriate and not excessive in accordance to the scope, purposes and services provided by **OXIGENO** and its relationship with the Registered User, having data that is marked with an "*" as mandatory and other that is not. However, in the case that you have given your consent to proceed to treat your data, this consent may be revoked at any time, by sending a communication to the address oxigenodatos@cuestamoras.com.

CONSEQUENCES OF THE NEGATIVE TO SUPPLY DATA

The implication of not providing the data or of denying the consent at for treatment at any time, will be the impossibility for **OXIGENO** to provide the different services offered to you as a Registered User of the App and / or Website, including enabling the account of Registered User to have access to it.

OF THE RECIPIENTS OF INFORMATION

In principle, the data from the Registered User Data will not be assigned, communicated or transferred to other third parties, in the case of a special situation in which some personal data should be transferred to a third party, it will first be notified to the Registered User and the proper consent requested.

OF THE AGE OF THE REGISTERED USER

The use of the App and Website is designed for people over 18 years of age, however, minors may also make use of the App and Website, understanding that they do so under the supervision and responsibility of their parents or guardians. Additionally, if any minor wishes

to create a Registered User of the App and / or Website, the pertinent authorization will be requested to his parents or legal guardians to collect his personal data.

Likewise, minors are prohibited, even with the consent of their parents, to include any type of information that: (i) is considered sensitive data by the LPD, or (ii) personal data of their parents or tutors and that is not merely contact information to verify the authorization mentioned in the previous paragraph.

OF THE RIGHTS THAT ASSIST YOU

The Registered User may exercise the rights of access, rectification, revocation or elimination to the processing of personal data by directing a written communication to **OXIGENO** to the address indicated at the beginning of this document or by contacting the following email address: oxigenodatos@cuestamoras.com

COMMUNICATIONS TO REGISTERED USERS

The management of personal data and the sending of communications by electronic means are in accordance with the regulations established in the LPD and its Regulations.

At the moment of managing your Registered User account, you authorize **OXIGENO** to send you communications on behalf of **OXIGENO** or third parties, however, you are informed that in all electronic communications issued by **OXIGENO** the name of the sender will be formally informed, as well as how you can object to continue receiving communications.

Notwithstanding the previous paragraph, Registered Users who request it may dispense with this service in a simple and free of charge manner, by sending a written communication to the address indicated at the beginning of this document or by contacting the following e-mail address: oxigenodatos@cuestamoras.com

OF SECURITY LEVELS

The personal data of our Registered Users is collected and stored in the database that was indicated at the beginning of this document of which **OXIGENO** is responsible and that guarantees the appropriate technical and structural measures to guarantee the integrity and security of the personal information provided by you according to the current state of the art.

OXIGENO maintains security levels of protection of your data in accordance with the LPD and its Regulations, security measures of databases containing personal data and all technical means have been established to prevent the loss, misuse, alteration, unauthorized access and theft of data that you provide to **OXIGENO**, without prejudice to inform you that security measures on the Internet can never be considered completely secure.

APPLICABLE LAW AND JURISDICTION

This Privacy and Data Protection Policy is governed by Costa Rican law. The parties are subject to the administrative system, the courts and tribunals of Costa Rica.

All the actions of **OXIGENO** or Registered Users will be considered made in Costa Rican territory for any legal effect.

This Privacy and Data Protection Policy is governed and construed in accordance with Costa Rican legislation in matters that are not expressly established.