



# TELUS Health

## Privacy and Information Confidentiality Statement

Privacy Notice

*Last updated: August 2025*

## Your Privacy, Your Rights and Our Commitment

*Dear Consultant/Beneficiary/Client/Professional*

EAP Latina with address at Avenida Del Libertador 6049, 1st floor "B" of the Autonomous City of Buenos Aires, Argentine Republic (C1428ARD) is the entity responsible for collecting, processing and protecting your personal data.

For all legal purposes provided in this privacy notice, the expression "EAP Latina" refers to EAP Latina Corporation S.A.; EAP Latina de México S.A. de C.V., EAP Latina Colombia S.A.S., Employee Assistance Program EAP Latina Costa Rica, EAS Employee Assistance Service Consultores Limitada, Employee Assistance Program Employee Assistance S.A, MASBIENESTAR S.A. de C.V. and Employee Assistance Program Perú SAC.

The information (personal data and sensitive personal data) that you provide to "EAP Latina" will be processed in accordance with the provisions of this Privacy Notice.

This Policy does not apply to third-party sites to which EAP Latina websites are linked and over which EAP Latina does not control the content or procedures related to privacy protection. Therefore, we advise you that if you access the mentioned websites, you should consult in advance the Terms and Conditions and privacy policies available on the sites you access.

By using the services provided by our company, you automatically accept and submit to the corresponding legislation regarding the protection of personal data according to your location and the international treaties of which your country is a party, as well as particularly to the following:

### **A. PURPOSE AND PROCESSING OF PERSONAL INFORMATION**

The data we collect will be used for the following purposes:

- a) To provide guidance services in emotional, legal, financial-accounting, nutritional, telemedicine, social assistance and veterinary concierge matters by telephone, in person, in writing or virtually, registering you in our database as a service user.
- b) To promote the comprehensive well-being of our users, contributing to improving their quality of life, through the attention, response, recording, monitoring, storage, communication to specialists and registration of requested consultations (via telephone,

WhatsApp Business or through the internet), preserving them as support for future consultations and for compliance with the law.

- c) To inform the user about changes or new services that are related to the Assistance Services contracted by your sponsoring company.
- d) To inform the user about upcoming events or services of EAP Latina or any of its affiliated companies and/or legal entities.
- e) To evaluate the quality and organization of EAP Latina.
- f) To comply with obligations arising from contracts entered into between EAP Latina and the sponsoring company that contracted professional advisory services for the user.
- g) To comply with any obligation arising from the present or future legal relationship indicated in the immediately preceding paragraph.
- h) To transmit them to third-party providers or contractors to provide or continue with the provision of services that EAP Latina is contractually obligated to provide you.
- i) With your prior express and informed authorization, to transmit your personal data and sensitive personal data to your employer or the entity that contracted this service for you, in order to identify, analyze and prevent psychosocial risk factors, promote a favorable organizational environment in workplaces or educational centers as well as to provide you with a comprehensive and effective evaluation of your degree of psychological well-being through surveys or screening evaluations on your self-perceived mental health with the preventive purpose of detecting possible pathologies early. In some cases, EAP Latina could carry out activities that involve statistical analysis of the results obtained in general and that it considers of interest, being able to publish and disseminate them in an anonymized manner in scientific journals, informative articles and conferences. In the event that you do not wish EAP Latina to process your information for these secondary purposes, you may revoke your consent at any time.
- j) To transmit them to third parties when there is an emergency situation that could potentially harm you or a third party in their person or property.
- k) Additionally, we will use your personal information for the following purposes that are not necessary to provide you with the requested service, but allow us to offer you better quality of care: (i) conduct satisfaction surveys regarding the use of the service; (ii)

receive information about related activities by telephone, WhatsApp Business and email. In case you do not wish your personal data to be processed for these additional purposes, you can limit its use by sending your request in writing to the address located at Avenida Del Libertador 6049, 1st floor "B" of the Autonomous City of Buenos Aires, Argentine Republic (C1428ARD). The refusal to use your personal data for these additional purposes cannot be a reason for us to deny you the services and products that you request or contract with us or that have been contracted for you.

- l) Notwithstanding the foregoing, your data may be used in an enunciative, non-limiting manner, to: (i) Provide you with the goods and/or services that you have requested or regarding which you have expressed interest; (ii) Ensure efficient service and provide better customer service, as well as to improve your experience in using certain products and/or services; (iii) Include your participation in mass talks; (iv) Inform about changes or new products or services that are related to those contracted or acquired; (v) Comply with obligations contracted with our clients; (vi) Evaluate the quality of service, conduct internal studies on consumption habits and prepare statistical reports.

For the purposes indicated in this Privacy Notice, EAP Latina may collect your personal data through different modalities:

- a) When information is provided directly by you to our contact center through phone calls, WhatsApp messaging or through the application and email.
- b) When you visit the internet sites of EAP Latina, subsidiary or related companies, and enter your data through forms or direct inquiries, specifically on the portal ([portaldebienestar.com](http://portaldebienestar.com)) and in the application (app + Bienestar) available for Android and IOS, owned by our company. We clarify that when we refer to the "portal," we are referring to our website: [portaldebienestar.com](http://portaldebienestar.com) and when we talk about "application" we refer to the +Bienestar app available for Android and IOS.
- c) When you participate in our social networks, for example when you participate by commenting or sending direct messages on any of our social networks or public sites (e.g. google)
- d) When you visit our internet websites and enter your data.
- e) In cases where you are referred to an EAP Latina professional to receive in-person or virtual psychological assistance, the professional will ask you to sign your informed consent to authorize us to process your personal data and sensitive personal data, if applicable.

- f) When we obtain information through means other than those indicated above and that are permitted by applicable laws.

The personal data obtained by the means indicated above may be: full name, employee number, Personal Identification Number, area to which you belong within an organization, position you hold in it, email, personal, work and cell phone, gender, address (street, number, neighborhood, city, state, zip code, country), date of birth, marital status, hobby, occupation, social, family, psychological, legal and health context, as well as eating habits, lifestyle and any other that is required according to the purposes established in this Privacy Notice and according to the needs of the service you request.

## **B. PRINCIPLES THAT WE WILL APPLY IN THE PROCESSING OF PERSONAL DATA**

In the processing of your personal data, we will apply the following principles:

- Principle of lawfulness, fairness and transparency: Your consent will always be required for the processing of your personal data for one or more specific purposes that will be previously informed with absolute transparency.
- Principle of data quality: the data collected for processing purposes will be adequate and pertinent in relation to the scope and purpose for which they were obtained.
- Principle of data minimization: Only strictly necessary data will be requested in relation to the purposes for which they are required. The minimum possible.
- Principle of storage limitation: Data will be maintained for no longer than necessary for the purposes of processing and by virtue of the legal deadlines provided for the prescription of actions regarding civil liability. The corresponding retention period will be reported; in the case of subscriptions, lists will be periodically reviewed and those records inactive for a considerable time will be deleted.
- Principle of integrity and confidentiality: Your data will be processed in such a way as to guarantee adequate security of personal data and ensure confidentiality. EAP Latina takes all necessary precautions to prevent unauthorized access or misuse of user data by third parties.
- Principle of Informational Self-Determination: Every person has the right to know who, when, for what purposes and under what circumstances they come into contact with their personal data with the objective of controlling the flow of information that concerns each of them, derived from the right to privacy, avoiding discriminatory actions.

- Principle of Portability: the data subject has the right to obtain from the data controller a copy of the personal data in a generic and commonly used format.

### **C. SENSITIVE DATA COLLECTED**

Sensitive personal data are considered to be those personal data that affect the most intimate sphere of their holder, or whose improper use may give rise to discrimination or entail a serious risk for them. In particular, those that may reveal aspects such as racial or ethnic origin, present or future health status, genetic information, religious, philosophical and moral beliefs, union affiliation, political opinions, sexual preferences are considered sensitive. Such information is only collected by EAP Latina when you voluntarily use our services and it is essential to provide you with adequate advice, including without limitation, our emotional, legal, financial-accounting and nutritional guidance services and for that reason, you voluntarily provide them to us.

To carry out our service we could use, collect and process, interchangeably, as required by the case and the requested advice, the following data:

- ✓ Identification data: Name, marital status, place and date of birth, nationality, and data recorded in official documentation that is necessary to prevent legal risks.
- ✓ Contact data: State and municipality or locality of residence, email, telephone (personal, work, mobile).
- ✓ Employment data: Organization where you work, area in which you work, emotional situation at work, physical activity habits during work.
- ✓ Personal data: family emotional situation, physical and mental health, economic and social context.
- ✓ Data on physical characteristics: General information regarding your physiognomy, anatomy, features or specific particularities, height, weight and build.
- ✓ Patrimonial or financial data: General information regarding your assets, rights, charges or obligations susceptible to economic valuation, such as: movable and immovable property; credit situation; income, expenses and financial habits.
- ✓ Health data: General information related to the assessment, preservation, care, improvement and recovery of your physical or mental health status, present, past or future.
- ✓ Ideological data: Information about a person's ideological, religious, philosophical or moral positions.
- ✓ Data on sexual life: General information related to your behavior, preference or orientation, sexual practices or habits, among others.

Remember that not all of the aforementioned data will necessarily be required; however, you should consider that such data may probably be required by our professionals when providing the guidance that you voluntarily ask us to provide you with correct professional advice or service. If this occurs, by providing us with your data you accept to submit to this privacy notice and authorize us to process your data in accordance with the provisions of points a) to l) of section "A" of this notice.

#### **D. LIMITATION ON THE USE OR DISCLOSURE OF PERSONAL INFORMATION**

The data you provide us by any means of contact will not be disseminated, distributed or commercialized (except as established in section A of this notice). The data collected in our processes will be stored, safeguarded and protected with due diligence through our information technology infrastructure; in order to protect your personal data against damage, loss, alteration, destruction or unauthorized use, access or processing.

At any time you may revoke your consent or limit the use, safeguarding, transmission and processing of information provided to EAP Latina, through the procedure indicated in the following section.

#### **E. EXERCISE OF RIGHTS OF ACCESS, RECTIFICATION, CANCELLATION AND OPPOSITION (ARCO RIGHTS)**

You have the right to know what personal data we have about you, what we use it for and the conditions of use we give it (Access). Likewise, it is your right to request the correction of your personal information in case it is outdated, inaccurate or incomplete (Rectification); that we delete it from our records or databases when you consider that it is not being used in accordance with the principles, duties and obligations provided in the law (Cancellation); as well as to oppose the use of your personal data for specific purposes (Opposition). These rights are known as ARCO Rights. Likewise, you may (i) request proof of the authorization granted; (ii) file complaints with the pertinent control body for possible violations of the provisions of current regulations; (iii) revoke the authorization given and (iv) refrain from answering questions about sensitive data. That is why we inform you that answers about sensitive data or data about minors are optional.

Our organization has a specific area (Personal Data Protection Department) whose main functions are to establish and administer procedures for the reception, processing, follow-up and timely attention of requests for the exercise of ARCO rights; as well as for the attention of complaints or requests submitted by holders, related to the policies and/or practices of personal data protection developed by the organization.

To exercise any of the ARCO rights, you must follow the following steps:

Submit your request for access, rectification, cancellation or opposition in writing to the following addresses:

- [protecciondedatospersonales@eaplatina.com](mailto:protecciondedatospersonales@eaplatina.com)
- Avenida Del Libertador 6049, 1st floor "B" of the Autonomous City of Buenos Aires, Argentine Republic (C1428ARD)

Such request must be accompanied by: I. Your name and address or other means to communicate the response to your request; II. Documents that prove your identity or that of your legal representative, in which case you must also present the public document (power of

representation) that proves their quality. In both cases you must present a copy of official identification and original for comparison (yours or your representative's, as the case may be).

The clear and precise description of the personal data with respect to which you seek to exercise any of the rights of access, rectification, cancellation or opposition (ARCO).

Any other element or document that facilitates the location of personal data.

Once the request is received, the EAP Latina Department will communicate to the data subject at the indicated address or through the authorized means, within a maximum period of ten (10) calendar days or five (5) calendar days counted from the date on which the request was received, the determination adopted according to whether you have exercised the right of access or rectification, deletion or updating of personal data.

In case the information contained in the request needs to be clarified or expanded, the holder may be required, only once and within five (5) days of receiving the request, to clarify or complete it. The holder will have a period of fifteen (15) days counted from the day following notification, to clarify or complete the request. If the holder clarifies or completes the request within the granted term, the controller will give it due attention, otherwise, it will be filed notifying this circumstance to the holder with the reasons for its decision. The filing of the initial requirement will not prevent the submission of a new request.

EAP Latina will inform the holder of the Personal Data of the meaning and motivation of the resolution, by the same means by which the request was received, and will accompany said resolution with the pertinent evidence, as the case may be.

The obligation to access information will be considered fulfilled when EAP Latina makes available to the holder, the Personal Data or through the issuance of simple copies or electronic documents.

In the event that a person requests EAP Latina access to their Personal Data, presuming that it is responsible and it turns out that it is not, it will be sufficient for EAP Latina to indicate this to the holder by any means (of those established in this section), to consider the request fulfilled.

The right of access will be exercised free of charge at intervals of no less than six months, unless a legitimate interest is proven for that purpose. The rectification, updating or deletion of inaccurate or incomplete personal data will always be carried out at no cost to the interested party.



The request may be denied in the following cases:

- a. When the applicant is not the owner of the personal data, or the legal representative is not duly accredited to do so;
- b. When our database does not contain the applicant's personal data;
- c. When there is a legal impediment, or the resolution of a competent authority, that restricts access to personal data or does not allow their rectification, cancellation or opposition, and
- d. When the rectification, cancellation or opposition has already been previously carried out.
- e. When the rights of a third party are harmed.

For the exercise of ARCO rights on personal data of minors or persons who are in a state of interdiction or incapacity established by law, the representation rules provided in the regulations applicable to the case will apply.

You can revoke the consent at any time that, if applicable, you have granted us for the processing of your personal data. However, it is important that you keep in mind that not in all cases can we attend to your request or conclude the use immediately, since it is possible that due to some legal obligation we may need to continue processing your personal data. Likewise, you should consider that, for certain purposes, the revocation of your consent will mean that we cannot continue providing our services to you.

## **F. CONTROL AND SECURITY OF PERSONAL INFORMATION**

EAP Latina uses appropriate technical and organizational measures to protect the information collected, using security technologies and access control procedures. Likewise, we seek to prevent the use or disclosure of your personal information without authorization, for example, by storing the information provided on servers located in Data Centers that have limited access controls. However, no security system or data transmission system over which the company does not have control and/or depends on the internet can guarantee total security.

Consider that, because our service is absolutely confidential, we cannot provide you with any data about third parties, including minors, relatives in direct or collateral line, spouses or partners.

Remember that the processing of personal data and sensitive personal data is subject to this PRIVACY NOTICE, as well as to the LEGAL TERMS AND CONDITIONS OF USE of the service, whose knowledge and acceptance is solely and exclusively your responsibility.

In terms of law, this privacy notice and by contractual agreement perfected when you use our services, you authorize the following:

- a) Except in exceptional cases and with prior notification, if you provide PERSONAL DATA and SENSITIVE PERSONAL DATA to EAP Latina (or its personnel), EAP Latina will acquire the status of CONTROLLER of the processing of such information and may prepare a written record with the summary of communications received, storing in full all communications obtained, keeping them for a minimum period of six months (which may be extended in accordance with laws regarding the statute of limitations for actions arising from civil liability), under strict confidentiality; this for the purpose of: (i) Providing comprehensive follow-up to inquiries made by users of our services; (ii) Clarifying any type of claim or complaint about the service that may arise; thus providing quality service and (iii) in accordance with the criterion of the applicable statute of limitations according to the case.
- b) Communications that a person makes using our services may not be delivered to third parties, being kept in strict confidentiality by EAP Latina, except as provided in this PRIVACY NOTICE.
- c) By contractual agreement with you, when using our services or authorizing their use to minors or incapacitated persons, EAP Latina will be obliged to store for a minimum period of six months, counted from the day they are received, the written records or any communication that has been provided by users of the services with the exception indicated in point a) of this section.
- d) By using our services you agree, authorize and are in agreement that, in the event that you or a person makes comments that allow presuming or supposing that there is a real situation that could potentially harm any individual in their person or property, then EAP Latina, its employees, collaborators or contractors, may discretionally transfer, even without the consent of the holder, the personal data and sensitive personal data that are considered absolutely essential for the purpose of safeguarding the integrity of the user of our services or people around them.
- e) The transmission of personal data may be made to the entity that contracted our services for you and/or third parties involved and/or to the competent authorities, as appropriate, who will become CONTROLLERS of the processing of your DATA.
- f) Except for exceptions provided or derived from the law, EAP Latina will discretionally proceed to cancel your data or communications within 5 (five) business days following the occurrence of any of the following events: (i) the purpose for which the data was provided ends (ii) when its processing is no longer necessary for the purposes of applicable legal provisions; (iii) the minimum mandatory data retention period set contractually or legally ends or; (iv) when so required, in writing, by the data subject, except that the law requires keeping them for a certain period, in accordance with the provisions of this Privacy Notice.

- g) The cancellation of your personal data and sensitive personal data will give rise to a blocking period, after which permanent deletion will proceed. During the blocking period, the data provided may not be subject to processing. EAP Latina may keep them in the blocking period, exclusively for the purposes of responsibilities arising from the processing.
- h) When the storage period of data and sensitive personal data has exceeded the statute of limitations for actions arising from the legal relationship that underlies its processing, in terms of applicable law, EAP Latina is obliged to permanently delete each and every one of the documents, lists, electronic or magnetic media, microfilms or films, recordings and other similar instruments or recording media known or to be known, through which the data has been collected or provided, as well as all copies and replicas thereof.

## **G. TRANSFER OF YOUR PERSONAL DATA**

All personal data that you provide us through the use of the service and the sites you visit may be transferred or stored in a geographic region with different privacy policies with respect to your country of origin. It may possibly involve sending your personal data to a country with less strict data protection laws than yours. Such transfers will be made in accordance with current laws.

By this means you authorize EAP Latina to transfer and/or send your personal data to a third natural or legal person, or to some authority, in the following cases:

- i. It is permitted by some law.
- ii. When the transfer is made to controlling, subsidiary or affiliated companies under the common control of the controller, or to a parent company or any company of the same group of the controller that operates under the same internal processes and policies.
- iii. The data appears in publicly accessible sources.
- iv. The personal data is subjected to a prior dissociation procedure (your personal data is isolated from statistical data).
- v. There is an emergency situation that could potentially harm you or harm an individual in their physical integrity, person or property.
- vi. The purpose is to fulfill some obligation between you and EAP Latina, or between the sponsoring company that contracted our services for you and EAP Latina.

vii. They are essential for guidance, prevention, diagnosis, when you are not in a position to give your consent.

viii. A resolution of competent judicial authority is issued.

ix. It is necessary for EAP Latina to continue providing services.

x. Whenever it is necessary to attend to a complaint or claim about our services.

xi. Whenever it is necessary for you to receive timely attention from our services.

xii. In all other situations indicated throughout this Privacy Notice.

xiii. The foregoing without prejudice to the exceptions indicated by legislation and international treaties.

## **H. PROTECTION**

The security and confidentiality of the data that users provide when using our services will be protected by a secure server, so that the data sent will be transmitted encrypted to ensure its safeguarding.

However, and despite having increasingly secure tools every day, the protection of data sent over the Internet cannot be guaranteed 100%; therefore, once received, EAP Latina will do everything possible to safeguard the information.

## **I. USE OF COOKIES AND WEB BEACONS**

The EAP Latina site ([www.eaplatina.com](http://www.eaplatina.com)) uses cookies to help us obtain statistical information about your use of the site. At any time you can delete the cookie used by our site, by accessing the configuration preferences of your browser. Likewise, you can prevent this file from being reinstalled by making the corresponding adjustments in your browser's configuration preferences.

On the other hand, we also use web beacons, these are images inserted in a web page or email, used to monitor the behavior of a visitor, such as storing information about the user's IP address, duration of interaction time on that page and the type of browser used, among others.

Like cookies, you can also prevent the use of this tool through your browser settings.

## **J. DATA RETENTION**

Personal data will be maintained by EAP Latina as long as the User does not request their deletion and kept during the legal periods for compliance with obligations and attention to possible responsibilities, as explained in this PRIVACY NOTICE.

## **K. MINORS**

The professional advisory service and this site is not designed or directed for use by minors under 16 years of age. We do not knowingly collect any personal data from minors under 16 years of age without the prior consent of their parents or guardians. Said parent or guardian has the right, upon request, to consult the information provided by the minor and request that it be deleted. In addition, any minor must request authorization from their parents or guardians before using or disclosing any personal data on this site.

## **L. USE OF DATA FOR MARKETING**

EAP Latina will not sell or transfer your personal data to any entity that does not belong to its business group for direct commercial use, unless we communicate this to you clearly and obtain your express consent.

## **M. CHANGES TO THIS PRIVACY STATEMENT**

EAP Latina reserves the right to make modifications to this privacy notice; therefore, it may undergo modifications, changes or updates without prior notice, derived from new legal requirements; from the needs that the products or services we offer have or present; from our privacy practices; from changes in our business model, or for other reasons.

In the event that changes are made to this statement, we will communicate it through the following website: [www.eaplatina.com](http://www.eaplatina.com), accessing the footer in the "Policies and Privacy Notice" section.

Therefore, we suggest periodically visiting this privacy statement to be informed of any updates. The date of the last revision is at the bottom of this page.

We remind you that by using the services of EAP Latina you accept this Privacy Notice, as well as the Terms and Conditions of Use. Otherwise, you must refrain from entering this site, calling our contact center, contacting us by any means of access and using the services of EAP Latina.

## **N. REGULATIONS**

- Personal Data Protection Law No. 25.326 of the Argentine Republic
- Constitutional and Federal Law on Protection of Personal Data Held by Private Parties of Mexico and reform of March 2025
- Law No. 21.719 on Personal Data Protection, Chile;
- Law 1581 of 2012 and its regulatory decree 1377 of 2013, Colombia
- Law 8968 Law on Protection of the Person Against the Processing of their Personal Data, Costa Rica
- Law 172-13 on Comprehensive Protection of Personal Data, Dominican Republic
- Organic Law on Personal Data Protection of Ecuador and Regulatory Decree No. 904.
- General Law on Personal Data Protection of Brazil
- Article 2, second paragraph of the Constitution of El Salvador
- Law 787/12, Nicaragua
- Law No. 81 on Personal Data Protection of Panama
- Law 18.331 partially modified by Law 20.075, Uruguay
- Law 29.733, Peru
- Law 6534, Law on Protection of Credit Personal Data. Paraguay

## **Ñ. CONTROL BODIES**

Personal Data holders are hereby informed that the Agency for Access to Public Information of the Argentine Republic, the Anti-Corruption and Good Government Secretariat of the United Mexican States, the Superintendence of Industry and Commerce of Colombia, the Personal Data Protection Agency of Chile, the Directorate of Personal Data Protection of the Republic of Nicaragua, the Superintendence of Banks of the Dominican Republic, the Agency for the Protection of Data of the Inhabitants of the Republic of Costa Rica, the National Authority for Transparency and Access to Information of the Republic of Panama, the General Directorate of Transparency, Access to Public Information and Personal Data Protection of Peru, the Regulatory and Control Unit of Personal Data of Uruguay, the National Data Protection Authority (ANPD) of Brazil, Secretariat of Public Function, Secretariat of Consumer and User Defense of Paraguay and the Pertinent Courts of Justice, in their respective capacities as Control Bodies of legislation regarding Personal Data Protection, have the authority to attend to complaints and claims filed by those who are affected in their rights due to non-compliance with current regulations regarding personal data protection.

Privacy Notice

*Last updated: August 2025*