



Privacy Policy Notice

April 2026



This Privacy Policy Notice (the "**Privacy Policy**") describes the types of personal data that MILLS CAPITAL GROUP S.A., Argentine Tax ID (CUIT) 30-71472077-1, with registered office at Lamadrid 1467, Dorrego, City of Mendoza, Province of Mendoza, Argentina, and principal place of business at Juana Manso 1750, 5th Floor, Torre Sur, City of Buenos Aires, Argentina, together with the companies forming part of its affiliated companies — Mills Capital Markets S.A., Mills Capital S.A., Mills Asset Management S.A., and Mills S.G.R. (the "**Mills Group**") — collect and use from users.

This Privacy Policy applies to the processing of data carried out through: (i) the website <https://mills.capital>, including its main domain and all of its subdomains, directories, and derived subpages (the "**Website**"); and (ii) all other Mills Group communication channels, including official social media profiles, instant messaging, and registration for or participation in in-person or virtual events organized by any Mills Group company (together with the Website, the "**Channels**").

Any person who accesses or uses the Channels acquires the status of user (the "**User**"). By using the Channels, the User expressly, knowingly, voluntarily, and unambiguously consents to having their personal data processed by any Mills Group company, in accordance with the terms of this Privacy Policy. Accordingly, this Privacy Policy constitutes a valid and binding agreement between Users and any Mills Group company.

This Privacy Policy is supplemented by the Terms of Use published on the Website, which are deemed to be fully accepted by the User upon interacting with any of the Mills Group's Channels.

BY ACCESSING, CONNECTING TO, OR USING THE WEBSITE AND/OR THE CHANNELS, THE USER CONFIRMS THAT THEY HAVE READ, UNDERSTOOD, CONSENT TO, AND ACCEPT THE TERMS AND CONDITIONS OF THIS PRIVACY POLICY. PLEASE READ THE FOLLOWING PRIVACY POLICY CAREFULLY. IF YOU DO NOT AGREE, PLEASE DO NOT USE THE WEBSITE.

This Privacy Policy applies to all data that the Mills Group collects from the User, whether directly or automatically (such as cookies and browsing data), through the Channels.

The Mills Group considers the privacy of personal data a priority. This document describes the personal data that Mills Group companies collect from the User, how such data is processed, and the measures implemented to protect it. The User's information will be kept in a database owned by the Mills Group companies.

The Website is not directed at persons under 18 years of age. If the User is a minor, they must not use the Website or provide their personal data, unless they have the authorization and express consent of their legal representatives.

For any questions regarding this Privacy Policy, please write to info@millscapitalgroup.com.

CLAUSE ONE: COLLECTION OF INFORMATION

1.1. INFORMATION COLLECTED

The User agrees that the Mills Group may collect certain data from the User, including personal data and Personally Identifiable Information (PII). PII is information that can identify the User directly or indirectly (the "**Data**").

1.1.1. Information the User provides directly to the Mills Group. Users agree that the Mills Group may collect information provided by the User through registration request forms on the Website and/or the Channels. Users agree that the Mills Group may collect and/or process the personal information that the User provides in connection with the Channels, including, but not limited to, the following:

- (i) **Identification data**, such as first and last name, nationality, and date of birth; and identity documents or personal identification numbers, such as the National Identity Document ("ID"), among others.
- (ii) **Contact data**, such as address, email address, and landline and/or mobile phone number.
- (iii) **Employment data**, such as information concerning prior or current employment, the organization to which the User belongs, position, title, professional experience, and information relating to training, evaluations, professional profile, among others.
- (iv) **Academic data**, such as information that allows us to understand the User's professional status, including schooling, educational background, specialization, level of education, degrees, certificates, records, awards, and professional license.
- (v) **Electronic records**, such as data obtained when the User uses the Channels, including data provided to us or related to such use.

1.1.2. Information that may be collected automatically by the Mills Group. In this same regard, the User agrees that the Mills Group may collect, gather, and/or store their Data using cookies and/or tags and/or any other automated information-detection method provided by the tools offered on the Website. The information collected by the Mills Group may include browsing behavior, IP (Internet Protocol) number or address, logs, and other types of information. An IP address is a numerical identifier that distinguishes an electronic computing device (whether a computer, mobile phone, tablet, etc.) that connects to a computer network (for example, the internet). The Mills Group's storage of Users' devices' IP addresses allows it to identify Users when they log into their individual accounts and facilitates the diagnosis of any connection issues that may arise between the Mills Group's Website and Users, thereby improving the quality of the Channels. However, the Mills Group does not directly collect PII from any User using cookies, tags, or any other automated information-detection method provided by the tools offered on the Website.

Information that may be collected automatically includes the following:

- (i) **Information about the services you use**, such as the content accessed, the times at which the User accesses the Channels, the links clicked, and other actions the User takes while using the Channels.
- (ii) **Information about the devices used to access the Website and/or our social media profiles**, such as the operating system, browser type or version, device settings and parameters, including device language, IP address, and device identification.
- (iii) **Information about your location**, such as approximate location (based on your IP address or data indicating a city or postal code) or more precise geolocation.

1.1.3. Where applicable, the User agrees that, in order to use the platforms provided by the Mills Group, they must provide, at a minimum: (a) first and last name; (b) identification number (ID, TIN, etc.); (c) date and place of birth; (d) actual residential address, and proof of address; (e) a clear copy of the front and back of the ID; (f)

email address; (g) landline and/or mobile phone number; (h) marital status; (i) employment status and applicable category, and, in the case of Simplified Regime Taxpayers (Monotributistas) or Independent Contractors, proof of tax payments; (j) profession, trade, or activity carried out, including phone number and address; (k) spouse's information, where applicable; (l) purpose of opening the account; (m) whether the User acts on their own behalf or on behalf of a third party and, if so, on whose behalf; (n) an indication of the source of the funds to be used; (o) countries in which the User has tax residency; (p) details of the User's bank accounts, together with proof of back account; (q) any documentation that allows the Client's financial capacity to be determined (for example: proof of income, invoices for the last 12 months, lease agreements, income certifications and/or asset declarations, property sales, inheritance receipts, etc.); and (r) in the case of independent professionals and/or merchants and/or businesspeople, copies of the credential authorizing the practice of their profession and/or a copy of the certified corporate resolutions appointing them as legal representative and/or a certified copy of the shareholders register, as applicable. Notwithstanding the foregoing, the Mills Group may request additional information from the User, at its sole discretion.

1.2. PURPOSES OF PROCESSING

The purposes of processing the User's Data are:

- a) to provide the services and make available the Channels offered by the Website.
- b) to offer and provide the Channels, and to improve their quality.
- c) to identify and contact the User, for example, regarding activities to be carried out by the Mills Group that may be of interest to them, including, among others, meetings, talks, and/or conferences.
- d) to offer a personalized service, tailored to the User's needs, in order to provide the best possible experience.
- e) to connect the User with the Mills Group in a manner that allows contact to be made in order to provide the Channels of interest.
- f) to address and manage any type of inquiry, complaint, or suggestion that Users may have, as well as to provide them with support.
- g) to comply with legal obligations and requirements from competent authorities.
- h) to carry out all types of promotional activities, including, but not limited to, the sending of newsletters, marketing communications, and promotional materials.
- i) to evaluate the User as a prospective client if the User has begun the account opening and/or onboarding process provided by the Mills Group.

CLAUSE TWO: USE OF DATA

The Mills Group will use the information provided by Users and the information collected automatically by the Mills Group for the following purposes:

- (i) to analyze it in order to provide Users with better services. In accordance with this purpose, the Mills Group may send Users notifications, news, and updates of interest to them, in addition to those of an institutional or legal nature;

(ii) to analyze Users' conduct and behavior, in their capacity as such, on the Website, such as their geographic locations, usage sessions, time spent on the Website, and frequency of use, for the purpose of attempting to improve its services and provide better solutions to their needs; and

(iii) where requested by courts, national or international government agencies, or administrative and/or judicial authorities that, in the exercise of their authority, require information from the Mills Group.

The Mills Group may use, and does use, third-party services, for which it is not responsible with respect to the information such services collect or how they protect personal information.

The Mills Group may share information with other Channel companies, websites, or similar entities for the purpose of improving the quality of the services provided by the Mills Group. Such companies or websites generally have their own Data privacy policies for the protection of Data. In any case, the Mills Group will use its best efforts to ensure that the privacy of Users' shared information is protected as effectively as possible. Where applicable, the Mills Group will attempt to enter into express agreements regarding Data protection and information privacy. Notwithstanding the foregoing, the Mills Group will not be liable for damages caused by such companies and/or websites in connection with their duty to protect, keep confidential, and safeguard the privacy of the Data they handle.

If the Mills Group collects information provided by the User, it will use such information for the maximum period established by applicable law, in order to analyze and process it to provide Users with the best possible service. The Mills Group is not required to retain the information for any set period and will arrange for its deletion whenever it deems appropriate.

CLAUSE THREE: THE WEBSITE

The Mills Group will not sell, rent, or trade any Data to any third party for purposes other than those set forth in this Privacy Policy.

The Mills Group's Website may use cookies to record User patterns. If a Website User does not wish to accept these cookies, they may configure their browser to accept and reject each cookie as desired. Users may reconfigure their internet browser to reject all cookies or to be notified when a cookie is sent. However, if cookies are disabled, certain features of the Channels may not function properly, and the Mills Group will not be liable for this.

The Mills Group's Website may contain links to other websites that are not owned by the Mills Group. Accordingly, the Mills Group will not be liable for Users' actions on such websites, to which this Privacy Policy does not apply. The Mills Group recommends reviewing the detailed privacy policy on those websites to understand the information collection procedures they use and how they protect their Data. The Mills Group assumes no responsibility for the content of websites other than its own, nor for the use of such websites or their privacy practices.

The provisions of this Privacy Policy will apply to all Users who have accessed and/or provided their Data, or not, on any of the Channels.

CLAUSE FOUR: CROSS-BORDER DATA TRANSFERS

Solely to fulfill the purposes set forth in this Privacy Policy and for the purpose of providing services, the Mills Group may disclose the Data collected, when necessary, to authorities, partners, and affiliated companies of the Mills Group, and other third parties, such as third-party service providers.

In some cases, Data may be transferred to countries or jurisdictions that may not have the same Data protection regulations as those in force in Argentina and, consequently, may offer a lower level of protection, which the User declares to understand and consent to. When Data is transferred to other countries, it will be protected as described in this document, implementing safeguards that ensure an adequate level of protection for Data transferred outside of Argentina.

CLAUSE FIVE: CONFIDENTIALITY AND SECURITY OF INFORMATION

The Mills Group adopts reasonable security measures to protect Users' information and to prevent unauthorized access to their Data or any unauthorized modification, disclosure, or destruction thereof. The Mills Group does not allow access to this information by third parties outside the Mills Group, except at the express request of the User.

To ensure the security of the Data that the User provides to the Mills Group, the same criteria and the same degree of diligence that the Mills Group applies to safeguard its own information will be applied. Information collected by the Mills Group will be kept strictly confidential, and access to the Data will be restricted to those employees, contractors, operators, and/or representatives of the Mills Group who need to know such Data in order to perform their duties and/or develop and/or improve the Channels. The Mills Group requires its providers to adhere to the same confidentiality standards.

Notwithstanding the foregoing, and considering that the internet is an open, publicly accessible system, the User acknowledges that existing technical security measures are not unbreakable and that, even where all reasonable security precautions are taken, information may still be subject to manipulation, destruction, and/or loss. Accordingly, the Mills Group cannot guarantee that unauthorized third parties will not eventually be able to overcome security measures and misuse Users' information.

CLAUSE SIX: BUSINESS TRANSFERS

The Mills Group reserves the right to transfer the information collected in the event of a sale or merger of the Mills Group, an acquisition of the Mills Group's principal assets, or any other type of transfer of the Mills Group to another entity. In such event, the Mills Group must take reasonable measures to ensure that such information is used in a manner consistent with this Privacy Policy.

CLAUSE SEVEN: USER RIGHTS. CONTACT INFORMATION

The Mills Group will use all means available to it to provide Users about whom it has collected or stored personal information with access to their Data ("**Right of Access**"), as well as the rectification, modification, or updating thereof ("**Right of Rectification**"), or even the deletion and/or erasure of such Data ("**Right of Deletion**"), unless the Mills Group may deny such requests (the "**Requests**") in cases where it is required or entitled to retain such Data under applicable law.

For such purposes, the User must submit their Request by sending an email to info@millscapitalgroup.com with the subject line "Access to Personal Data." The Mills Group may require the User to verify their identity, which

the Mills Group may confirm, and to specify the Data to which they wish to gain access, or which they wish to rectify or remove.

Likewise, the Mills Group may decline to process Requests that are unreasonably repetitive and/or systematic, that require a disproportionate technical effort, that jeopardize the privacy of other Users, and/or that are considered impractical or for which access to the Data is not necessary.

Data access, rectification, and/or deletion services will be provided by the Mills Group free of charge, except where they require a disproportionate or unreasonable effort, in which case administrative fees may be charged.

Data subjects are entitled to exercise the Right of Access free of charge at intervals of no less than six (6) months, unless a legitimate interest is demonstrated in accordance with Article 14, subsection 3, of Argentine Law No. 25,326. The Agency for Access to Public Information (Agencia de Acceso a la Información Pública), acting as the Supervisory Authority under Law No. 25,326, has the power to address complaints and claims filed by individuals whose rights have been affected by non-compliance with applicable Data protection regulations. To contact the Agency for Access to Public Information:

Address: Av. Pte. Julio A. Roca 710, 2nd Floor, City of Buenos Aires, Argentina. Website: www.argentina.gob.ar/aaip Email: datospersonales@aaip.gob.ar Phone: +54 11-2821-0047

Any User who has provided personal contact information through the Website may send an email to info@millscapitalgroup.com in order to update, delete, and/or correct their personal information, as well as to raise any questions regarding the scope of this Privacy Policy and/or any concerns regarding the privacy and/or security of the information provided to the Mills Group. The Mills Group must respond to such request within the period established by applicable law, from receipt of the request by email.

CLAUSE EIGHT: LEGAL DISCLOSURES

Notwithstanding any provision to the contrary in this Privacy Policy, the Mills Group may disclose information collected from Users where it believes in good faith that such disclosure is reasonably necessary to:

- i. avoid legal liability;
- ii. comply with a legal requirement, such as a search warrant, a subpoena, or a court order;
- iii. comply with a request made by a governmental or regulatory authority; and/or to protect the rights, property, and/or safety of the Mills Group, of Users, and/or of third parties.

CLAUSE NINE: UPDATES TO THIS PRIVACY POLICY

The Mills Group may modify or update this Privacy Policy at any time without prior notice, where it deems appropriate, and to reflect changes introduced to Data practices as required by applicable law, and in particular Data protection regulations, or to reflect changes to its own policies regarding Data collected through the use of the Channels. Such changes will be notified through the publication of a prominent notice on the Website. Any modification to this Privacy Policy will take effect from the time of its publication.

The User agrees that continued use of the Channels after the publication of the new version of the Privacy Policy will be deemed acceptance of such modifications to the Privacy Policy. Accordingly, the User agrees to periodically review the Website.

This Privacy Policy was last updated on April 7, 2026.