



COLOMBIA ASESORÍAS S.A.S.

PERSONAL DATA PROCESSING POLICY
COLOMBIA ASESORIAS S.A.S.
NIT.: 901.002.828-9

1. PRESENTATION

With the objective of complying with the current law on the matter of protection of Data, especially Law 1581 of 2012 (and other regulations that modify it, add, Complement or develop) and Decree 1377 of 2013, below we put it to both aspects and the collection, use and transfer of personal information that **COLOMBIA ASESORIAS S.A.S.**, hereinafter the "Company", Realization of your personal data, by virtue of the authorization granted by you for advance said treatment, as well as the management.

In this policy of treatment of personal data you will find the guidelines corporate and law under which the Company performs the processing of its data, the purpose, its rights as owner, as well as internal and external procedures for the exercise of such rights.

In accordance with the provisions of article 15 of the Political Constitution of Colombia and the applicable legislation (Law 1266 of 2008, Law 1581 of 2012, Decree 1377 of 2013 and all those rules that regulate, add, repeal or modify), We have a clear privacy policy and protection of your personal data: no We obtain personal information from third parties who have a business relationship or legal relationship with the Company, including you, Clients, Employees or Providers, unless they have provided it voluntarily through their prior, express and qualified consent.

2. DEFINITIONS

For the interpretation of this Policy, we ask you to take into account the following definitions:

- a. **Personal data:** Any information linked to or associated with one or more determined or determinable natural persons.
- b. **Sensitive data:** Those data that affect the privacy of the Owner or whose use undue can generate your discrimination.



COLOMBIA ASESORÍAS S.A.S.

- c. **Responsible for the Treatment:** Natural or legal person, public or private, which by itself same or in association with others, perform the processing of personal data on behalf of the Company as Responsible for the data.
- d. **Treatment Policy:** Refers to this document, as a policy of treatment of personal data applied by the Company in accordance with the guidelines of current legislation on the subject.
- e. **Provider:** Any natural or legal person that provides a service to the Company by virtue of a contractual / obligational relationship.
- f. **Responsible for the Treatment:** Natural or legal person, public or private, that by itself or in association with others, decide on the database and / or the Treatment of data, for the purposes of this policy, will exercise, as a Company.
- g. **Owner:** Natural person whose personal data is subject to Treatment, be a customer, supplier, employee, or any third party who, by reason of a relationship commercial or legal, provide personal data to the Company.
- h. **Worker:** Any natural person who provides a service to the Company by virtue of an employment contract
- i. **Transfer:** Refers to the shipment by the Company as Responsible for the treatment or a data controller, to a third agent or natural or legal person (receiver), inside or outside the national territory for the effective treatment of personal Data.
- j. **Transmission:** refers to the communication of personal data by the Responsible to the Manager, located inside or outside the national territory, so that the in charge, on behalf of the Responsible, treat personal data;
- k. **Treatment:** Any operation or set of operations on personal data, such as collection, storage, use, circulation or deletion.

For the understanding of the terms that are not included in the list above, you must refer to current legislation, especially Law 1581 of 2012 and Decree 1377 of 2013, giving the meaning used in said norm to the terms whose definition there is any doubt.



COLOMBIA ASESORÍAS S.A.S.

3. TYPE OF INFORMATION SUBJECT TO TREATMENT

The Company recognizes that its Employees, Pensioners in charge if there were any in some time, shareholders and members of the Board of Directors have the right to have reasonable expectation of your privacy, taking into account in any case for this your responsibilities, rights and obligations with the Company.

By virtue of the relationship that is established between you and the Company, it collects, store, use and transfer personal data to companies located inside and outside of Colombia. These personal data and information include, among others:

3.1 Of the Candidates

- a. Name, identification, address, telephone number, date of birth, information studies, participation in recreation and sports activities.
- b. Resume, education, experience, links with entities, links with companies.

3.2 Of the Clients to

- a. Name of the Client or company name, identification number or NIT with digit of verification, place of address, address, telephone, fax, email.
- b. Name of the general manager or legal representative and address, telephone, fax, mail electronic.
- c. Name of the assigned for the portfolio collection, email.
- d. Number of permanent employees and operating time of the business and Information tributary.
- e. Bank information that includes the name of the bank account holder, number of the bank account and bank name or code.

3.3 Of the Suppliers

- a. To name of the Provider or company name, identification number or NIT with digit of verification, place of address, address, telephone, fax, email.
- b. Name of the general manager or legal representative and address, telephone, fax, mail electronic.
- c. Name of the manager or sales coordinator, address, telephone, fax, mail electronic.



COLOMBIA ASESORÍAS S.A.S.

- d. Name of the assigned for the portfolio collection, email; and. Number of permanent employees and time of operation of the business.
- e. Tributary information.
- f. Bank information that includes the name of the bank account holder, number of the bank account and bank name or code.

3.4 EMPLOYEES

- a. Worker and Family Group: name, identification, address, telephone, name of wife and children, name and identification of children, medical history, affiliations social security, medical policy, age, date of birth, study information, health status, medications they use, medical authorizations, participation in recreation and sports activities.
- b. Resume, education, experience, links with entities, links with companies;
- c. Salary and other payments.
- d. Balance of debts contracted with The Company or delivery and affiliations with payroll discount.
- e. Pension contributions;
- f. Constitution and contributions to voluntary pension funds, food vouchers, etc .
- g. Legal proceedings.
- h. Debts in favor of cooperatives.
- i. Discount authorizations.
- j. Affiliation information to employee funds, trade associations.
- k. Benefits throughout his working life.
- l. Work contract.
- m. Changes in the work contract;
- n. Linkage with previous employers;
- o. Labor history of the worker;
- p. Payment of aid and benefits;
- q. Beneficiaries of the worker for the purpose of payment of aid and benefits;
- r. Affiliation EPS, pension fund, ARL, Compensation fund;
- s. Trainings received;
- t. Psychological evaluation report;
- u. Detail of the characterization;
- v. Demographic report of the workers;



COLOMBIA ASESORÍAS S.A.S.

- w. Occupational history of the worker;
- x. Work accidents;
- y. Extra hours;
- z. Entry and exit from the office, permits;
- aa. Fingerprint;
- bb. Photographic record;
- cc. Annual evaluation of competence, performance evaluations.

If sensitive information is found within the information collected, **COLOMBIA ASESORIAS S.A.S.** will inform you of the quality of such sensitive data and the purpose of the treatment, and will only be treated with your prior, express and informed. Keep in mind that because it is sensitive data you are not obliged to authorize your treatment.

4. USE AND PURPOSE OF THE TREATMENT

The personal data is used to:

- a. Execution of the contract subscribed with any of the Company.
- b. Payment of contractual obligations.
- c. Sending information to governmental or judicial entities by express request
- d. Of the same.
- e. Support in external / internal audit processes.
- f. and. Sending / receiving messages for commercial, advertising and / or service purposes
- g. Client.
- h. F. Registration of the information of the candidates, clients, employees and suppliers in the
- i. Company database.
- j. Contact with candidates, clients, employees or suppliers for the sending of
- k. information related to the contractual, commercial and obligational relationship that has
- l. Place.
- m. Collection of data for the fulfillment of the duties that as Responsible
- n. of information and personal data, corresponds to the Company.
- o. For security or fraud prevention purposes.
- p. To provide effective customer service.



COLOMBIA ASESORÍAS S.A.S.

- q. Any other purpose that results in the development of the contract or the relationship between you and the Company.

If you provide us with Personal Data, this information will be used only for the purposes indicated herein, and we will not proceed to sell, license, transmit or disclose it outside the Company unless (i) you expressly authorize us to do so, (ii) is necessary to allow our contractors or agents to provide the services we have entrusted to them, (iii) in order to provide our products or services, (iv) be disclosed to entities that provide marketing services on our behalf or to other entities with which have joint marketing agreements, (v) is related to a merger, consolidation, acquisition, acquisition, divestment or other restructuring process, or (vi) as required or permitted by the law.

In order to implement the purposes described above, your personal data may be disclosed for purposes previously provided to human resources personnel, managers, consultants, advisors and other persons and offices as appropriate.

The Company may subcontract to third parties for the processing of certain functions or information. When we actually subcontract with third parties the processing of your personal information or provide your personal information to third party service providers, we warn those third parties about the need to protect such personal information with appropriate security measures, we prohibit the use of your personal information for purposes own and prevent them from disclosing their personal information to others or other restructuring process, or (vi) as required or permitted by law.

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Likewise, the Company may transfer or transmit (as appropriate) your personal data to other companies abroad for reasons of security, administrative efficiency and better service, in accordance with the authorizations of each of these persons, **COLOMBIA**



COLOMBIA ASESORÍAS S.A.S.

ASESORIAS S.A.S., Adopted the measures of the case so that those companies implement in their jurisdiction and according to the applicable laws, security standards and protection of personal data even similar to those foreseen in this document and in general in the Company's policy on the matter . In the case of transmission of personal data, the transmission contract will be subscribed to that which takes place under the terms of Decree 1377/13.

Additionally, we inform you that once the need to process your data ceases, they may be removed from the databases of COLOMBIA ASESORIAS SAS, or archived in secure terms so that they are only disclosed when there is an agreement with the law. Said data will not be eliminated despite the request of the owner, when the conservation thereof is necessary for the fulfillment of an obligation or contract.

5. RIGHTS OF THE HOLDER

In accordance with article 8 of Law 1581 of 2012, the rights that you as a holder have in relation to your personal data are:

- a. Know, update and rectify your personal data in front of **COLOMBIA ASESORIAS S.A.S.**, as the responsible for the treatment or in charge of the treatment. This right may be exercised, among others, against partial, inaccurate, incomplete, fractioned, misleading data, or those whose Treatment is expressly prohibited or has not been authorized.
- b. Request proof of the authorization granted to the Company as Responsible for the treatment except when expressly excepted as a requirement for treatment.
- c. Be informed by the Company, as Responsible for the Treatment or by the person in charge of the Treatment, upon request, regarding the use that has been given to your personal data.
- d. Submit to the Superintendency of Industry and Commerce complaints for infractions of the provisions of this law and other regulations that modify, add or supplement.
- e. Revoke the authorization and / or request the deletion of the data when the treatment does not respect the principles, rights and constitutional and legal guarantees.
- f. Access free of charge to your personal data that have been subject to treatment.



COLOMBIA ASESORÍAS S.A.S.

Within this policy you will find the procedure through which the Company guarantees the exercise of all its rights.

6. PROCEDURE FOR EXERCISING YOUR RIGHTS AS OWNER

If you have questions about this Policy, or any concerns or grievances, or in the case of the exercise of a complaint, rectification, update, consultation, or request for access or data theft, or with respect to the administration of the Policy, please contact with us through any of the following means:

By telephone: (57 1) 8053795 Mobile 317 639 8111

E-mail: proteccion.datos.personales@colombiaasesorias.com

Please note that once you inform the responsible area within the Company, depending on which of them your request is addressed, the request, request or complaint will be processed.

Contact: proteccion.datos.personales@colombiaasesorias.com

You can consult **COLOMBIA ASESORIAS S.A.S.** .. regarding the personal data that **COLOMBIA ASESORIAS S.A.S.** has stored in its databases, for which it will be necessary for the applicant or his legal representative to previously prove his identity. Said inquiry will be attended by **COLOMBIA ASESORIAS S.A.S.**, within a maximum term of fifteen (15) business days from the date of receipt thereof. This period may be extended by **COLOMBIA ASESORIAS S.A.S.**, on only one occasion, in which case you will be informed of the reasons for the delay and the date on which your request will be handled, which in no case will be greater than five (5) business days. following the expiration of the first term.

When it is not possible to attend the consultation within said term, will inform you, stating the reasons for the delay and indicating the date on which your inquiry will be attended, which in no case may exceed five (5) business days following the expiration of the first term.

Your request or request related to claims, updates, corrections, or deletion of your personal data must be attended within a maximum term of fifteen (15) business days from the receipt of the request or request. For the correct and complete consideration of your request, request or claim, we ask you to provide the identity of the applicant, his



COLOMBIA ASESORÍAS S.A.S.

identification number, the address of notifications / answers and the documents he wants to enforce.

If your request or request does not have enough information and facts that allow **COLOMBIA ASESORIAS S.A.S.** to attend to it correctly and completely, it will be required within five (5) days after receipt of the request, request or complaint so that correct your faults. After two (2) months have passed since the date of the request, if you as an applicant have not corrected as required, the Company receiving your request understands that you have withdrawn your request.

7. MODIFICATION OF THIS POLICY

This policy may be modified at any time, notifying you of the change and the latest version of this Policy or the mechanisms to obtain a copy thereof will be made available to you.

Effective date: June 01, 2018. Date last modified: June 1, 2018. Period of validity of the databases: The validity of the database will be the reasonable time and necessary to comply with the purposes of the information processing.

COLOMBIA ASESORIAS S.A.S.

Legal Representative