

1. NAME AND IDENTIFICATION OF THE ENTITY RESPONSIBLE FOR DATA HANDLING: RECAMIER S.A identified as having a NIT: 890302955-4, acts as the responsible entity for personal data handling, doing so through its FINANCIAL DEPARTMENT, attending to requests and claims made by the original data holder by exercising its rights as established on the Personal Data Handling Policy. To achieve this, the original data holder (or a designated representative) is free to submit its request, or claim to the following email: habeasdata@recamier.com.

2. USES TO WHICH DATA WILL BE SUBJECTED TO AND THEIR PURPOSE: the data holder provides a free and explicit permission for the GATHERING OF PERSONAL DATA AND ITS HANDLING to RECAMIER S.A, for them to exert its social objectives and its relations to third-parties, and to use said data for the following aims and functions:

I. HANDLING OF CUSTOMER/CONSUMER DATA: payment of contractual obligations; holding campaigns for updating data from users, customers, consumers or other third parties; manage and compile all information required for proper compliance of tax obligations or corporate, commerce or accounting registries of RECAMIER S.A; provide information on account balances to customers; study and process requests made by customers or consumers at any time; properly execute any kind of contract being held with RECAMIER S.A; sharing of data with government or law entities when expressly required by said entities; to present as support during internal or external audits; logging the customers/consumer's data on the company's database; contacting candidates or customers for the sharing of information related to properly fulfilling currently held contractual or commercial relations; holding campaigns, studies, promos, scientific research or any other activity related to our corporate purpose; to exert the right to properly know the customer/affiliate/benefited party to hold relations with, provide services to, or to assess the current or future risk of said relations and services; RECAMIER S.A will be able to yield data (be it partial or complete information) of all people that have provided or that will provide it in the future, to be used by affiliate companies, entities or strategic allies to be used for commercial, marketing or administrative purposes; to provide, by itself or alongside third parties, products, goods, and or *commercial, credit, services, as well as holding promotion campaigns, alongside third parties; to do internal research on consumer's habits; to hold commercial, social, informative events or promotions for our customers, consumers, distributors, providers or any other third parties; gathering data for fulfilling the duty held as the responsible party for the handling of information and personal data; assess and fulfil requests made by our customers and/our consumers* at any time; providing information regarding any change in our products, prices or services; provide, share, send or give personal data to RECAMIER S.A's affiliate, linked, or subordinated third parties, whether located in Colombia or any other country, as long as they are compliant to the standards set by the Superintendencia de Industria y Comercio, in the event that such third parties do require said info for the purposes mentioned here; RECAMIER S.A will be able to contract third parties for processing said functions or information. When the handling and processing of personal data is actually contracted with third parties, RECAMIER S.A will warn said third-parties of the need to protect said personal information with appropriate measures, forbids the use of said information for the third party's own means and requests for that information to not be shared with others; to transfer, share, and or transmit personal data towards third parties (either domestically or internationally) as needed for properly upholding a contract, law or to provide (or be provided with) cloud computing services; to send commercial information, marketing or promos related to products, services and upcoming events to the customer's physical mail, email, cellphone or mobile device (via SMS and/or MMS) or through any other analog/digital media created or that may be invented in the future, aiming to promote, boost, invite, apply, or hold events or promotions (whether commercially oriented or not), campaigns, contests or just to provide general information about any relevant project being worked on by RECAMIER S.A and or any third party; to use said information for any other aim purpose that results on the

development of the currently-held contract or the relationship itself between the company and the data holder; to provide information regarding changes in products or services (including the discontinuation of product lines or goods); to execute billing-related actions, queries, fraud-prevention, verification of personal, work or business references or to cross-examine them against lists posted by websites or different entities (either private or from the government, domestic or international), researching criminal or disciplinary precedents as deemed necessary by RECAMIER S.A; to manage recollection, either persuasive, pre-legal or legal through any media (either written, telephonic or personal) with the purpose of recollecting, control, behavior assessment, payment habit or any other kind of activity related with our products and services; to request or submit information from or to databases such as CIFIN and DATACREDITO (among others) with the aim of furthering the company's objectives and purposes, or for RECAMIER S.A's risk assessment, or through other aims such as statistical information or business aims; to maintain and process, through different technological devices, such as computers or mobile platforms, any kind of information related to the customers, with the aim of gathering relevant data and to promote our products and services; to provide a reply for congratulations, requests, or claims sent to the company, as stated by our quality policy; to evaluate the quality of our service, the customer's satisfaction and any other kind of information related to our products and services; to provide information about new products or services or changes made to the already existent ones; to control and prevent fraud, money laundering and terrorist financing; for handling information in a way authorized by law for historical, statistical or scientific aims; to provide compliance for request made by authorities whenever such thing is needed to safeguard public interests, or the correct application of justice; for furthering managing, commercial, marketing, sales or information aims; to offer any kind of commercial services; and to hold campaigns with aims such as promotion, marketing, advertisement, data verification or the handling of illegal data coming from customers and the relevant databases.

II. HANDLING OF EMPLOYEES PERSONAL DATA AND INFORMATION: the handling of employees' personal data and their family nucleus will be done with the objective of successfully delivering the company's work obligations such as payroll, granting benefits; casual activities with employees; to hold events or promotions with commercial, social or informative aims to the company's managers or employees; verifying the employees' precedents; for the HR team at RECAMIER S.A or a third party to hold citations, evaluations or texts (both physical and knowledge-based) and interviews; to request proof of information stated in Cvs; to have a log of sign-up instances on any database; to transfer the data or partial information to its sister companies or any associated store, company entity or strategic allies; to verify and research the compliance of certain requisites as demanded by ongoing selection processes; to make sure personal, family, personal referrals, credentials, certificates, licenses, academic diplomas, or others, that have been provided alongside a job application or CV are correct and truthful; to request recommendations and referrals regarding performance on past employment positions; to contact candidates in order to schedule job interviews; to gather and evaluate results of physical and knowledge-based tests; to verify the candidates' lifestyle, academic history, family life and personal habits that may prove useful to acknowledge the candidates' social environment; to create records of the candidates, archive the tests' results and interviews; to inform and archive the general results from a job selection process at its different stages; to have a log of the people that applied to the process and/or were disqualified; to create job contracts; to create non-disclosure agreements; to record personal data in the companies' data systems; to provide training and or instruction on the skills needed for an optimal job performance; to log payroll incidents such as work leaves, disabilities, overtime, work permits and holidays, and also changes regarding job activities; to document failures of compliance to established work policies; to issue work certificates or referrals if requested; to hold periodical job performance evaluations; to document and store information regarding the activities in which the companies employees participate or relate to each other; to issue internal publications in

blackboards or similar media to provide information regarding topics such as welcoming new partners, life stories, acknowledgements and recognition, upcoming events, employees' birthdays and social activities in which the company becomes involved; to create directories or contact lists including information on how to contact you; to carry on the handling of its employees' and their family nuclei so as to properly comply obligations arisen from the job contact such as payroll, granting benefits; to control unauthorized access to the company's facilities to both employees and directives through biometrical devices; to deliver work communications, memos or relevant information through physical mail, email, cellphone or mobile-devices wheter by text messages (SMS and/or MMS) or any other analog/digital media be it currently available or to be developed in the future; to communicate with our employers or sales representatives through apps or mobile platforms for the gathering of data and product or services' sales; to report information to the competent authorities if needed; to control employees' or directives' unauthorized access to the company's facilities through biomeric devices.

III. HANDLING OF FORMER EMPLOYEES PERSONAL DATA: to use said data as a basis for work certificates as defined by Article 57, point 7th of the Código Sustantivo del Trabajo if requested by the former employee or their relevant associates; to use said data as a basis for creating work referrals directed to potential employers for the former employee if authorized to do so at the moment of job dismissal; all information stored in this record may be studied, analyed and used by RECAMIER S.A for considering the former employee in any other job selection process to be held in the future.

IV. HANDLING OF PROVIDERS AND/OR CONTRACTORS PERSONAL DATA: to comply with RECAMIER S.A's internal policies regarding the management of providers and contractors; to execute its contractual obligations with providers and creditors, including payment of said obligations; to control, process and exert a financial record of the different obligations acquired with the providers; to hold events or promos (whether commercial, social or informative) to our members and/or providers, or other third parties; to evaluate the providers' performance; to carry selection and evaluation processes for current and potential future providers; to inform said providers of their current balances; to hold engagement, or data updating programs or campaigns for providers or creditors; to establish, manage or terminante commercial relations or verify business referrals associated with them; to provide business metrics or other data that is requested in held contracts or agreements subscribed with the correspondent provider; to log the providers/creditors information on the company's database; the handling of data gathered because of the reasons defined by the current paragraph will be sustained and remain active as long as the aim or purpose for which said data was gathered still stands; to receive or hold inquiries, audits and revisions related to the nature of the relation established with the provider; to record the current relationship and verify the execution and compliance of its associated contract; to carry on inquiries, fraud prevention, verifying commercial referrals or to cross examining lists and webpages issued by private or government entitites, either domestic or international related with money laundering and terrorist financing.

V. HANDLING OF VISITOR'S PERSONAL DATA: to control the entrance and exit to and from RECAMIER S.A's facilities of its workers; directors, employees, visitors and any other person; to adopt security measures for the benefit of all people that enter or exit said facilities; to properly identify all people inside of the facilities, when needed for evacuation, accident purposes or to report any incident to the relevant authorities, if needed; for video-recordings made both inside and outside of RECAMIER S.A's facilities, which will be used for security matters and may be used as evidence in any kind of process.

3. RIGHTS GRANTED TO THE DATA HOLDER:

RECAMIER S.A assumes responsibility for respecting and guaranteeing the following rights of its data holders:

A. **RIGHT OF ACCESS:** through which any person will have the right to access, acknowledge, update and correct the personal data given to RECAMIER S.A in its role as the entity responsible for handling said data. This right may be exercised, among other situations, in regards of partial, inaccurate, incomplete, fragmented, misleading data or whatever data deemed forbidden to use or that hasn't been properly authorized for use.

B. **RIGHT OF CONSENT:** to request proof of the authorization granted to RECAMIER S.A for the handling of data, through any kind of appropriate media, except in cases in which said authorization is not required.

C. **RIGHT OF INFORMATION:** with a previous request and about the reasons and ways how its personal data has been used.

D. **RIGHT TO FILE COMPLAINTS:** to the Superintendencia de Industria y Comercio, or the relevant entity, for perceived infractions to the norms established on the Ley 1581 of 2012 and any other legal documents that may modify it, compliment it or add to it. This has to be done after filing a complaining or about the incident with RECAMIER S.A first.

E. **RIGHT TO UPDATE, CORRECT AND DELETION INFORMATION:** including revoking the standing authorization or requesting the deletion of data whenever the principles, rights and both legal and constitutional guarantees as defined by this Policy are not upheld.

F. **RIGHT TO ACCESS STORED PERSONAL DATA:** doing so free-of-charge and to access personal data that has been subject to management, doing so at least one time per month and every time there are substantial changes made to the present Policy that demand a new inquiry or request.

4. **TOOLS MADE AVAILABLE BY THE DATA HANDLER SO THE DATA HOLDER CAN ACKNOWLEDGE THE PERSONAL DATA HANDLING POLICY:** RECAMIER S.A will release the Personal Data Handling Policy for all the holder at the website: <https://www.recamier.com> so as to provide acknowledgement of its contents and how they can use their rights as personal data holders.