

PERSONAL DATA HANDLING POLICY

Table of Contents

PERSONAL DATA HANDLING POLICY.....	1
INTRODUCTION.....	2
GENERAL CONSIDERATIONS.....	2
GLOSSARY.....	2
LEGAL CONSIDERATIONS.....	4
1. ENTITY RESPONSIBLE FOR THE HANDLING OF PERSONAL DATA.....	5
2. Handling to which personal data will be subjected.....	5
2.1 Purpose of the handling of personal data.....	6
2.2 Scope of the handling of personal data.....	6
2.3 People to which the handling of personal data is aimed to.....	6
2.4 Handling of personal data for children and teenagers.....	6
2.5 Permission for the handling of personal data from children and teenagers.....	7
2.6 Handling of delicate personal data.....	7
3. PURPOSE OF THE HANDLING OF PERSONAL DATA:.....	7
I. HANDLING OF CUSTOMER/CONSUMER DATA:.....	7
II. HANDLING OF EMPLOYEES PERSONAL DATA AND INFORMATION.....	9
III. HANDLING OF FORMER EMPLOYEES PERSONAL DATA:.....	10
IV. HANDLING OF PROVIDERS AND/OR CONTRACTORS PERSONAL DATA:.....	11
V. HANDLING OF VISITOR'S PERSONAL DATA:.....	11
3.1 PRINCIPLES FOR THE HANDLING OF PERSONAL DATA.....	12
3.2 TECHNICAL MEDIA SURVEILLANCE.....	13
3.3 PERSONAL ACCESS CONTROL.....	13
3.4. HANDLING OF DATA BY THE WEBSITE.....	13
3.5. SOCIAL MEDIA TREATMENT.....	14
4. INFORMATION SECURITY POLICIES.....	14
4.1. INTERNAL DATA PROTECTION MEASURES AND.....	14
COMPLIANCE.....	14
4.2. INFORMATION SECURITY WHEN PRESERVING AND STORING INFORMATION IN OUR DATABASES.....	15
5. TIME CONSTRAINTS FOR THE HANDLING OF PERSONAL DATA.....	15
6. RIGHTS OF THE DATA HOLDER.....	15
7. DUTIES AND OBLIGATIONS OF RECAMIER S.A.....	16
8. RESPONSIBLE DEPARTMENT AND PROCEDURE FOR THE EXERCISE OF THE PERSONAL DATA OWNER'S RIGHTS.....	17
9. PROCEDURES TO EXERCISE THE RIGHTS OF ACCESS AND TO OBJECT.....	17
9.1. PROCEDURE TO EXERCISE THE RIGHTS OF THE DATA SUBJECT:.....	17
9.2. PROCEDURE FOR THE RIGHT TO ACCESS AND TO OBJECT.....	17
9.3. TIMELAPSE FOR RESPONDING TO REQUESTS.....	18
9.4. TIMELAPSE FOR ATTENDING TO CLAIMS.....	18
9.5. ELEGIBILITY REQUIREMENT.....	19
10. DATA PROTECTION POLICY AND DATABASE EFFECTIVE DATE.....	19
10.1 DATA COLLECTED BEFORE THE DATA PROTECTION POLICY EFFECIVE DATE.....	19

10.2 VALIDITY PERIOD OF THE DATA PROTECTION POLICY.....	20
10.3. VALIDITY OF THE DATA PROTECTION POLICY.....	20

INTRODUCTION

RECAMIER S.A, by complying to what was established on the Ley 1581 of 2012 “Through which general dispositions are set for the protection of personal data”, the Decreto Reglamentario 1377 of 2013 and the Ley 1266 of 2008, and other complimentary disposition and, aiming to guarantee the constitutional right known as Habeas Data; and also the privacy, intimacy and good wil of our directors, shareholders, employeers, providers, creditors and visitors, adopts the policies found in the following manual, which defines the personal data policies, so as to allow for the correct application and protection of the data holder’s rights.

GENERAL CONSIDERATIONS

RECAMIER S.A is a company dedicated to the use and building of chemical laboratories meant for the making of beauty products and hygiene products in general, distribution, selling, while also purchasing domestic and foreign merchandise, imports and exports of the same kind of products, foreign patents and also purchasing and selling of machinery, equipment and prime materials for its laboratories.

RECAMIER S.A, in its role as entity responsible for data handling. Through the following document, known as “policy and procedures for the handling of personal data” (hereafter, referred to as “Manual”), defines the conditions for the adequate use and organization of personal data. This manual contents’ contemplate all elements for the compliance of corresponding laws regarding Habeas Data and protection of personal data and that, given its role as the entity responsible for data handling, RECAMIER S.A must apply and set up, aiming to completely comply to the rules defined by the Ley 1581 of 2012 and its ruling decree.

GLOSSARY

For the current policy’s development, the following definitions are adopted, found in the Ley 1581 of 2012 and the 25th chapter of the Decreto 1074 of 2015, and other according laws.

Authorization: previous, informed, consent. Made directly by the data holder to proceed with the handling of personal data.

Privacy notice: a physical or electronic document made by the entity responsible for the handling of data and given or provided to the data holder with information related to the existence of the data handling policies that apply, how to find them and the purposes of how personal data will be handled.

Database: a organized set of personal data which will be subject to being handled and used.

Query: a request made by the data holder or other parties authorized by it, or through legal or judge mandate to know the information regarding the holder that exists in either the database, physical or magnetic media.

Financial data: every kind of personal data related to the origin, execution or extinction of money-related obligations, regardless of which contract they come from, and which method of handling is determined by the Ley 1266 of 2008 or any other additional laws that complement it, modify it or expand it.

Personal data: information that's related to a person. Every piece of information related to one or several people (that are already determined or that could be determined) or a personal data policy that can be linked to either a natural or legal person. Personal data can be either public, half-private or private.

Public data: its any kind of data designated as such according to what's established by law or the national constitution. Information such as contents of public documents, sentences executed by judges that are not in stand-by or information related to a person's marital status.

Half-private data: data designated as half-private are those that aren't of an intimate, reserved nor public but its divulgation may be of interest not only for the data holder but also for a specific sector or group or to society as a whole, such as financial data or commercial activity related credit data.

Private data: any kind of data that, given its intimate or reserved nature it's just relevant for the data holder.

Sensible data: data related to the holder's race or ethnic origin, its affiliation to syndicates, societal organizations, personal politics, sexual orientation, biometric data or health-related information. This information can be withheld by the data holder.

Habeas data: the right every person has to know, update or correct data that may have been gathered from it in the database or in the records of public or private entities.

Entity in charge of the handling of data: either a natural or legal subject, public or private that, by itself or by associating with others, handles personal data as requested by the entity responsible for the handling of data.

Entity responsible for handling of data: either a natural or legal subject, public or private that, by itself or by associating with others, makes decisions regarding the database or the handling of data.

Handling of data: any kind of operation or set of operations done over personal data that may include gathering it, storing it, using it, deleting it or divulgating it.

Data holder: natural subject whose data is the subject of treatment by the company.

Succesor: a person that, either by inheritance or granting, acquires the rights of the data holder for its personal data.

Representative or attorney: a person that, through a legal or judge's rule, or to provide representation, acquires the data holder's rights to its data, so as to proceed in its stead.

Claim: a request made by the data holder or its representatives, or through either a legal or judge's rule to correct, update or delete its personal data.

Data transfer: Data transfer is done whenever the data holder or the entity in charge of the handling of data, located in Colombia, submits information or personal data to a receiving party, which, in turn, becomes an entity responsible for the handling of data and may be location either inside or outside the same country.

Data transmission: one instance of handling of personal data where said data is communicated (whether domestically or internationally from Colombia) whenever this is done because of another instance of handling of data by the entity in charge for the handling of data, on behalf of the entity responsible for the handling of data.

Minors: people under 18 years of age: children and teenagers.

Manual: the whole of the policies and procedures meant for protecting personal data as designed by the company, where the policies and procedures for guarantee compliance to the Ley 1581 and any complementary laws or decrees.

LEGAL CONSIDERATIONS

Article 15 off the Colombia's Constitución Política determines that "all people have a right to their personal and familiar intimacy, and to their goodwill, and so, the state must respect and enforce respect of said rights. Furthermore, they have a right to know, update and correct any kind information gathered from them in database or in private or public entities' database".

The Ley 1581 of 2012 and its Decreto Reglamentario 1377 of 2013, previewed the existence of an adequate kind of handling for personal data for those entities that assume the role of responsible for the handle of data and those in charge of their database.

Besides this, point J) of the 17th article off the Ley 1581 of 2012 mandates for entities responsible for the handling of data to "Handle queries and claims made according to the terms established in this law and, specially for dealing with QUERIES and CLAIMS".

Accordingly, point K) of the 17th article off the Ley 1581 of 2012 mandates for entities responsible for the handling of data to "adopt a company manual of policies and procedures to guarantee the compliance of the present law, and specially for dealing with QUERIES and CLAIMS."

Adding to this, point C) of the 18th article off the Ley 1581 of 2012 mandates both entities responsible and in charge of the handling of data to properly provide any QUERIES and CLAIMS with the personal data requested by its holders found in any database.

Article 2th *ibid.* Establishes that policies of data handling are of mandatory compliance and that their failure to do so or ignorance of them will imply sanctions. Said policies can't guarantee a level of safe handling inferior to what was established in the Ley 1581 of 2012.

Through the Sentencia C-748 from October 6th 2011, the Corte Constitucional declared the Proyecto de Ley Estatutaria # 184 of 2010 as constitutional.

The Ley 1273 of 2009, through which the Código Penal (Penal Code) was modified, creates a new tutored legal interest, defined as “protection of information and data” which states that “it is said to have committed the crime of violation of personal data those who ‘without proper knowledge, looking for personal profit or for a third party, gathers, compile, extracts, offers, sells, exchanges, submits, buys, intercepts, spreads, modify or uses personal codes, general data as contained in files, archives, databases or similar media”.

The Ley 1266 of 2008, through which the general dispositions of Habeas Data are set and through which the handling of information contained in personal data databases (specially financial, credit, commercial, services and that coming from other countries) is regulated, and additional dispositions are also established.

Decreto 886 of 2014, that provides partial regulations on the Ley 1581 of 2012 regarding the Registro Nacional de Bases de Datos (National Database Records).

Chapter 25th off Decreto 1074 of 2015, which focuses on providing partial regulations on the Ley 1581 of 2012 in regards of general dispositions for the protection of personal data.

Any other legal disposition that modifies, regulates, or complements any of the laws mentioned above.

1. ENTITY RESPONSIBLE FOR THE HANDLING OF PERSONAL DATA

Name or Social Title	RECAMIER S.A
NIT	890302955-4
Type of Company	Private
Province	Valle del Cauca
City	Cali
Address	Calle 34 #8A - 115
Mobile Phone	3155729109
Landline Phone	57 2 418 0808
E-mail	habeasdata@recamier.com
Website	https://www.recamier.com/

2. Handling to which personal data will be subjected

2.1 Purpose of the handling of personal data

To establish a set of directives, procedures and rules by RECAMIER S.A for the proper handling of personal data. This manual has the purpose of communicating to our CUSTOMERS and FINAL CONSUMERS and all people who have either in the past or in the future, provided their personal data to our company RECAMIER S.A (which acts as the entity responsible for the handling of data), how the different types of data handling will apply to their personal data and to allow the data holders of said data to exert their right of Habeas Data, by establishing a procedure that must be followed if they ever desire to KNOW, UPDATE, CORRECT or DELETE, the personal data that is stored on our databases or records. Additionally, this manual also has the purpose to protect and guarantee all freedoms and fundamental rights that all people have in regards to the handling of personal data.

This manual is made in accordance to the Decreto 1377 of 2013, ruled by the Ley 1581 of 2012, in regards to the privacy acknowledgement that must be made to the data holders on behalf of RECAMIER S.A, as the entity responsible for the handling of personal data.

2.2 Scope of the handling of personal data

The handling of data will be applied to all personal data that may gathered through phone, in person and/or virtual; either through spoken or written word, doing so in Colombia and developed by RECAMIER S.A, from its directors, shareholders, employeers, providers, creditors and, whenever it applies, by third-parties with which RECAMIER S.A establish either partially or completely for the holding of any kind of activity regarding or relating to the handling of personal data.

2.3 People to which the handling of personal data is aimed to

The current manual is aimed to the directors, shareholders, employees, customers, visitors, providers, creditors and other natural subjects interested in being part of commercial activities or its social purpose. Personal data used or found on RECAMIER S.A's databases, being the entity responsible for the handling of data.

2.4 Handling of personal data for children and teenagers.

In accordance to what's established on the Ley Estatutaria 1581 of 2012 and the Decreto Reglamentario 1377 of 2013 and additional laws, with the purpose of guaranteeing the protection of fundamental rights, specially for minors, when exerting RECAMIER S.A's commercial, marketing and contractual activities, the company must have previous, direct and informed consent from the parents (or legal representatives) for the children or teenager.

Handling of personal data coming from minors is, therefore, outlawed, unless when handling public information and, in this instance, handling of data will be made with the following considerations:

- Respect and advocate for the minor's interests.
- To guarantee compliance with the minor's fundamental rights.

2.5 Permission for the handling of personal data from children and teenagers.

RECAMIER S.A acknowledges the outlawing of the handling of personal data from minors and, because of this, will apply the following requisites and parameters as stated by law, for the gathering and handling of personal data coming from children and teenagers.

- Permission must be given by people able to legally represent the children and/or teenagers.
- The children and/or teenagers representative must guarantee them, before giving permission for the handling of data, the right to be listened and value their opinion taking into account the appropriate maturity, autonomy and full understanding of the issue at hand.
- There must be an acknowledgement that answering questions regarding data from children and/or teenagers is voluntary.

2.6 Handling of delicate personal data.

Regarding delicate personal data, RECAMIER S.A may use and handle said data whenever:

- The data holder provides explicit authorization to do so.
- The company properly notices the holder that sharing said information is not mandatory.
- The company properly informs the holder previously, in a complete way, which sensible data will be subject to use and handling and for what purpose.

RECAMIER S.A, in compliance to the exceptions denoted by law, forbids the handling of sensible data, except when the previously mentioned conditions apply.

3. PURPOSE OF THE HANDLING OF PERSONAL DATA:

The data holder freely provides an 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 or engagement programs 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 required by said entities

- To present said information 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 fulfill 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 assesment, 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 personal 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 furtheting managing, commercial, markering, 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 succesfuly devlivering the company's work obligations such as payroll and 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 nformation to its sister companies or any associated store, company entity or strategic allies.
- To verify and research the compliance of certain requisities 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 them.
- 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 biometric devices.

III. HANDLING OF FORMER EMPLOYEES PERSONAL DATA:

RECAMIER S.A will keep an archive in which the personal data of all employees that have decided to end their work relation with the company, for an indefinite amount of time. This archive will be use 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.

- 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, analyzed 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 terminate 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 entities, 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.
- Or 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.

3.1 PRINCIPLES FOR THE HANDLING OF PERSONAL DATA

RECAMIER S.A will proceed with its handling of personal data while adhering to the general and special rules on the matter and while also applying the following principles in an harmonious ways, adding to ther laws:

A) Principle of legality: the Handling of Data present on the databases owned by RECAMIER S.A will be compliant (whenever appropriate) with what's established on the Ley 1581 of 2012 and any current laws on the subject and additional documents that expand it, develop it or compliant it.

B) Principle of purpose: the Handling of Data present on the databases owned by RECAMIER S.A has a legitimate purpose, in accordance to the Constitution, the Law and other aims which were previously informed to the data holder.

C) Principle of freedom: the Handling of Data present on the databases owned by RECAMIER S.A will only be carried on whenever a previous informed consent has been given by the data holder previously, personal data may not be gathered or spread without previous permission, except when requested by a legal or judge order.

D) Principle of quality and truth: the personal data subjected to handling by RECAMIER S.A must be true, complete, exact, updated, verifiable and understandable. Whenever the company has incomplete, fractured or misleading data, RECAMIER S.A must abstain from handling it or ask the completion or correction of said information to its holder.

E) Principle of transparency: the Handling of Data is subject to limitations derived from the nature of personal data. Whenever the holder requests for it, RECAMIER S.A will provide information regarding the existence of personal data relevant to the holder, the purpose of their gathering and handling, and also the types of data handling they were subjected to.

F) Principle of restriced access and spread: the Handling of Data is subject to limitations derived from the nature of personal data. Personal Data may only be handled by RECAMIER S.A's staff with the correct authorization or ability to do so, or those who have the handling of data as part of their functions.

G) Principle of availability: RECAMIER S.A will not render personal data available for access through the internet or any other media, unless there are established technical measures that only allow access for the authorized persons.

H) Principle of security: information subjected to handling that's related to what the Ley 1581 of 2012 establishes will be handled with all technical and human measures needed to provide safety for the records, so as to avoid them becoming lost, counterfeit, or to avoid them from being accesed, used or researched without authorization or in a fraudulent way.

I) Principle of confidentiality: all people that become involved in the Handling of Personal Data that's not tagged as public will be obligated to provide a guarantee for the confidentiality of said information, even after finishing their work functions that are related to the handling of data.

J) Principle of Temporality: the timelapse through which personal data will be stored will be what's needed so as to achieve the purpose for which they were gathered and/or while the data holder has pending obligations, either direct or indirect responsibility, for additional time in storage because of special rules or prescription times.

3.2 TECHNICAL MEDIA SURVEILLANCE

RECAMIER S.A informs about the existence of a video surveillance system both static and mobile, set up at different internal and external sites of its facilities and offices.

Accordingly, RECAMIER S.A announces that said mechanisms will be properly signalled through the installation of video surveillance signs.

Video recordings have, as a general rule, the purpose of guaranteeing the safety of the goods or people (directors, employees, visitors and any other natural subject) both inside and outside the facilities, and this information may be used as proof during any other legal process as requested by the corresponding authorities.

The use of video surveillance will be subject to the respect and protection of people's intimacy.

Images taken will be stored for as long as needed according to the purpose to which they were gathered for.

3.3 PERSONAL ACCESS CONTROL

RECAMIER S.A will use biometric data gathering devices, which purpose will be limited to controlling access to its facilities from employees and/or directives, performing personal authentication and controlling fraud.

The handling of biometric data gathered will be limited to the aims described above.

3.4. HANDLING OF DATA BY THE WEBSITE

The main purpose of the RECAMIER S.A's. website (<http://www.recamier.com>) is to promote our products and / or services to the consumer. It also has a contact mailbox where personal information is collected, for the following purposes and uses:

- Replying to comments, requests or questions.
- Feedback for improving our products, website and services.
- Using browsing information to personalize the browsing experience on our website.

Using the information for security reasons, to protect our company, our customers and our website.
To send us your resume in order to participate in personnel selection processes at RECAMIER S.A
Using the information for marketing purposes, to send you information about new products and special offers.
Using the information to communicate with you about your account or our business relationship.

PARAGRAPH: RECAMIER S.A. informs the data holder that our website makes use of its own and / or third-party cookies, for the collection and recovery of information regarding navigation, to offer you personalized content and browsing experiences.

3.5. SOCIAL MEDIA TREATMENT

RECAMIER S.A. will inform all the people who voluntarily access and use the pages or "Fan Pages" published on social networks, including but not limited to Facebook, Google Plus or Instagram, about the personal data treatment policy.

The access and interaction of the user with the pages or "Fan Pages" of RECAMIER S.A., implies that the user unequivocally accepts, and gives his consent for the treatment of his personal data, according to this manual.

4. INFORMATION SECURITY POLICIES

4.1. INTERNAL DATA PROTECTION MEASURES AND COMPLIANCE

RECAMIER S.A applies control and security policies, in order to to commit ourselves to prevent, mitigate and eliminate the impacts of risks inherent to our operation that may directly or Indirectly impact our customers, shareholders, suppliers, employees and the community in general.

All directors, shareholders and employees must observe and respect this personal data protection manual when performing their duties, even after the legal, commercial, or work relation ends.

It is the responsibility of any employee* with access to company databases, to keep strict confidentiality of the information verified, shared and stored in them; for this effect, as a protection tool, confidentiality agreements independent of the employment contract are subscribed.

In cases where there is no employment relationship, RECAMIER S.A. will sign a confidentiality agreement, in which the contractor and / or providers are obliged to comply with this personal data treatment manual.

*Código Substantivo del Trabajo, Art 58: is an employee's special obligation to observe the precepts of the regulation and abide by and comply with the orders and instructions that in a particular way the employer or his representatives impart to him

4.2. INFORMATION SECURITY WHEN PRESERVING AND STORING INFORMATION IN OUR DATABASES

RECAMIER S.A. declares that it has an information security policy and a robust technological infrastructure, of imperative compliance for the organization. This is a shared responsibility that reasonably protects the personal information contained in the databases of RECAMIER S.A., Such responsibility implies the control and protection policies necessary to mitigate attacks, standardize the use of computer platforms, avoid the misuse of company resources and prevent unauthorized access.

In addition the company uses an ERP, which provides adequate control and employee access log on all company software. Its the responsibility of the entire organization to comply with all Information Security policies that apply. Compliance with these policies promotes security,integrity, confidentiality and availability of personal information data.

5. TIME CONSTRAINTS FOR THE HANDLING OF PERSONAL DATA

RECAMIER S.A., can only collect, store, update, use, circulate, transfer or transmit personal data during the time It's reasonable and necessary, in accordance with the purposes that justified the data handling, taking into account the relevant regulations and the administrative, accounting, fiscal, legal and historical aspects of the information. Once the purposes of the data handling are over and without prejudice to legal regulations that state otherwise, the company will proceed to remove the personal data on its possession. Notwithstanding the above, personal data must be preserved when so required for the fulfillment of a legal or contractual obligation.

6. RIGHTS OF THE DATA HOLDER

In accordance with the provisions of Article 8 of the Ley 1581 of 2012, any process that involves handling of personal data by RECAMIER S.A. of managers, shareholders, workers, users, clients, potential clients, suppliers, creditors and any third party with whom it has commercial and labor relations, RECAMIER S.A. will take it to respect and guarantee the following rights of the data subjects:

A) **RIGHT OF ACCESS:** by virtue of which every individual will have the right to access, update and correct personal data to RECAMIER S.A. as the entity responsible for the handling of data. This right may be exercised, among others, against partial, inaccurate, incomplete, fractured, misleading data, or those whose processing is expressly forbidden or has not been authorized.

B) **RIGHT TO CONSENT:** to request proof of the authorization granted to RECAMIER S.A. for the handling of data, through any valid means, except in cases where said authorization is not needed.

In addition to the above, the Ley 1581 of 2012. Article 10 states;

"Cases in which authorization is not necessary", The authorization of the Holder will not be necessary when it comes to: Information required by a public or administrative entity in the exercise of its functions legal or by court order, data of public nature, cases of medical or health emergency, information processing authorized by the law for historical, statistical or scientific purposes, data related to the Civil Registries. Whoever accesses the personal data without prior authorization must in any case comply to the demands contained in the mentioned law.

C) RIGHT TO BE INFORMED: To be informed by RECAMIER S.A., by prior request, about the use that has been given to your personal data.

D) RIGHT TO SUBMIT COMPLAINTS: before the Superintendencia de Industria y Comercio, or the institution acting in its place, whenever there's complaints about noncompliance to the provisions of the Ley 1581 of 2012 and other regulations that modify, add or complement it, after processing consultation or claim before RECAMIER S.A.

E) RIGHT TO UPDATE, CORRECTION AND DELETE:

Withdraw the authorization and / or request the removal of the data when the principles, rights and guarantees demanded by constitutional and legal regulations are not respected.

F) RIGHT TO ACCESS PERSONAL DATA: free of charge to personal data that has been handled, at least once monthly, and whenever there are substantial modifications of this policy that motivate new inquiries.

7. DUTIES AND OBLIGATIONS OF RECAMIER S.A.

RECAMIER S.A. as entity responsible of the handling of data must fulfill the following duties, without prejudice to the other regulations in the law and others that govern their activity:

- Guarantee to the Data Holder, at all times, the full and effective exercise of the Habeas Data rights.
- Request and keep a copy of the respective Authorization granted by the Data Holder and properly inform it about the purpose of the collection and the rights that assist you by virtue of the authorization granted.
- Keep the information under secure conditions to prevent their adulteration, loss, as well as unauthorized or fraudulent access or use.
- Guarantee that the handled information is truthful, complete, accurate, up-to-date, verifiable and understandable.
- Update the information, communicating in a timely manner to the entity in charge of the handling of data, and ensure its timely update.
- Correct the information when it is incorrect and report the situation to the designated entity in charge of the handling of data.
- Process the queries and claims made by the Data Holders in the terms indicated in the law.
- When requested by the Data Holder, provide information about the use given to their data.
- Alert the data protection authorities of any violation of security codes, and any risks pertaining to handling of the information of the Data Holders. Provide to the entity in charge of the handling of data, the Personal Data whose handling has been previously authorized, in the cases that apply.

- Comply with the instructions and requirements issued by legal authorities regarding the procedures used for the collection, storage, use, circulation and disposal of information; likewise, provide an explanation about the need for data collecting in each case, the procedures for Treatment, preservation and removal of personal data.
- If the Data Holder demands it, the entity responsible for the handling of data Data Controller must report on the use that has been given to their data.
- Alert the Industry and Commerce Superintendency of any violation of security codes, and any risks pertaining to handling of the information of the Data Holder.

8. RESPONSIBLE DEPARTMENT AND PROCEDURE FOR THE EXERCISE OF THE PERSONAL DATA OWNER'S RIGHTS

RECAMIER S.A. as the entity responsible for the handling of data and, through the Finance Department, will respond to requests, complaints and claims made by the data owner in exercise of the rights covered in this policy. For such purposes, the owner of the personal data or whoever exercises his representation may send a request for consultation or claim by communication addressed to habeasdata@recamier.com, clearly specifying the personal data related to your inquiry along with the requested action.

9. PROCEDURES TO EXERCISE THE RIGHTS OF ACCESS AND TO OBJECT

To exercise the rights of the data holder to access, update, correct and delete the information about you that rests in our files and / or databases, you can follow these procedures:

9.1. PROCEDURE TO EXERCISE THE RIGHTS OF THE DATA SUBJECT:

The Data Holders, by themselves or through their representative and / or attorney or their successor may exercise the following rights, regarding the personal data that are subject to handling by RECAMIER S.A.

FIRST PARAGRAPH: If the request is submitted by someone other than the data holder, such a request shall be considered as not presented and no response will be provided.

SECOND PARAGRAPH: The rights of minors will be exercised through their legal guardians.

9.2. PROCEDURE FOR THE RIGHT TO ACCESS AND TO OBJECT

The data holders or their successors in title and / representatives may exercise the RIGHT TO ACCESS and RIGHT TO OBJECT regarding their personal information stored in RECAMIER S.A.'s databases, which shall provide them with all the information contained in their record, or linked to their ID. Those who follow the above indicated procedure must provide the following information:

- Full Name
- Contact Information: residential address, email and phone numbers.
- How they'd like to receive RECAMIER S.A.'s reply.
- Information about the Data Holder that is linked to their ID in the RECAMIER S.A. databases
- Reasons behind the request and what it intends to achieve (access, update, rectification, deletion, or fulfillment of obligations)
- Description of the right you wish to exercise before RECAMIER S.A.

A) INQUIRIES: as Data Holder, you may access the information that resides in our databases, for which the applicant or his legal representative shall offer proof of identity in advance.

B) CLAIMS: the Data Subject may submit CLAIMS regarding Personal Data Processed by RECAMIER S.A. which should be subject to correction, update or deletion, or when noticing the alleged breach of lawful obligations.

9.3. TIMELAPSE FOR RESPONDING TO REQUESTS

The maximum term to answer a request shall be ten (10) business days starting from the day following the date of receipt. Whenever it is not possible to meet such deadline, we will inform the interested party about the reasons for the delay and the date on which the response will be delivered, which in no case may exceed five (5) business days following the expiration of the first term.

9.4. TIMELAPSE FOR ATTENDING TO CLAIMS

CLAIMS: the Data Holder may submit CLAIMS regarding Personal Data handled by RECAMIER S.A. which should be subject to correction, update or deletion, or when noticing the alleged breach of lawful obligations.

Such CLAIMS shall be presented in writing or by email, including the Data Holder's ID, the reasons behind the request, personal address and accompanying documents.

The maximum term to attend the claim will be fifteen (15) business days starting from the day following the date of receipt. When it is not possible to meet such deadline, we will inform the interested party about the reasons for the delay and the date on which the response will be delivered, which in no case may exceed eight (8) business days following the expiration of the first term.

In the event that the person receiving the Claim is not competent to resolve it, it will be transferred to whoever corresponds no later than the next business day, within a maximum term of two (2) business days and will inform

the situation to the interested party in a maximum of ten (10) business days. Once the complete Claim is received, a caption saying "CLAIM IN PROCESS" it will be included in the database along with the reason for it, in a term no longer than two (2) business days. Said caption shall stay until the claim is properly resolved.

PARAGRAPH ONE: If the claim or additional documentation are incomplete, RECAMIER S.A., will require the claimant submit the appropriate corrections for one time only within five (5) days of receipt of the claim. If the claimant does not submit the documentation and information required within two (2) months following the date of the initial request, the claim will be understood that to have been withdrawn.

SECOND PARAGRAPH: The Claims related to the erasure of information or the revocation of the Authorization, will not proceed when there is a legal or contractual duty to remain in the database.

9.5. ELEGIBILITY REQUIREMENT

The data holder, successor, representative and / or attorney may only raise a complaint to the Industry and Commerce Superintendency once the Request or Complaint has been exhausted before the Data processor, or when the legal term to comply with it expired, in which case the Data holder will have the right to request the Superintendencia de Industria y Comercio for commanding the fulfillment of said request. Proceedings as described in Article 22 of the Ley 1581 of 2012 shall apply.

10. DATA PROTECTION POLICY AND DATABASE EFFECTIVE DATE

10.1 DATA COLLECTED BEFORE THE DATA PROTECTION POLICY EFFECTIVE DATE

In accordance with the Number 3, Article 10 of the Decreto Reglamentario 1377 of 2013, RECAMIER S.A. will proceed to publish a notice on the website: <http://www.recamier.com> addressed to the Data holder for the purpose of announcing the present Data Protection Policy and how to exercise your rights as Data Holder.

PARAGRAPH: if within thirty (30) business days, counted since the announcement of this policy, the Data Holder has not contacted the entity responsible for the handling of data to request the erasure of their personal data, according to the terms of this policy, RECAMIER S.A. will continue to process any personal data contained in their databases for the purposes mentioned in this Data Protection Policy, notwithstanding the Data Holder's ability to exercise at any moment their right to object and request the erasure of the data.

10.2 VALIDITY PERIOD OF THE DATA PROTECTION POLICY

The Personal Data that is stored, used or transmitted will remain in our Database, based on the criteria of time and necessity, during the time that is necessary for the purposes mentioned in this Policy and for which they were collected.

10.3. VALIDITY OF THE DATA PROTECTION POLICY

This policy effective date is June 30, 2017

PARAGRAPH: This policy may be modified at any time and unilaterally by RECAMIER S.A., giving timely notice to the Data Holder through the website <http://www.recamier.com>, these modifications shall be in accordance with Decreto 1377 of 2013, regulations of the Ley 1581 of 2012, and according to instructions issued by the Superintendencia de Industria y Comercio.