

PERSONAL DATA PROCESSING POLICY

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I. PURPOSE OF THE PROCESSING POLICY

ABCINFUSE S.A.S. (hereinafter referred to as "ABCINFUSE S.A.S. "or the "Company"), which is committed to the security of the personal information of its users, customers, suppliers, contractors, employees and the general public and in order to strictly comply with current regulations on the protection of Personal Data, in particular the provisions of Law 1581 of 2012, Decree 1377 of 2013 and other provisions that may amend them, is allowed to present the Processing Policies on the protection of Personal Data (hereinafter the "Policy") in relation to the collection, storage, use, circulation and suppression of such data, by virtue of the authorization granted by the Data Subjects.

The Company describes in this Policy i) the general corporate guidelines that are taken into account in order to protect the Personal Data of the Data Subject, ii) the purpose of the collection of the information, iii) the rights of the Data Subject, iv) the area responsible for handling complaints and claims, and v) the procedures that the Data Subject must follow in order to know, update, rectify and delete the information subject to processing.

In compliance with the constitutional right to Habeas Data, the Company only collects Personal Data when it has been previously authorized by the Data Subject, implementing for such purpose, clear measures on confidentiality and privacy of Personal Data.

II. DEFINITIONS FOR PROCESSING POLICY PURPOSES

For the purposes of this Policy, the definitions outlined below shall apply:

Data Subject: Natural or legal person whose Personal Data is the object of Processing.

Data Controller or Data Processor: Natural or legal person, public or private, that by itself or in association with others, decides on the database and/or the processing of the data. In this case, the Company.

Personal Data: Any information linked or that can be associated to one or several determined or determinable natural persons.

Public Data: Data that is not semi-private, private or sensitive. Public data includes, among others, data related to the marital status of individuals, their profession or trade, and their status as merchants or public servants. By their nature, public data may be contained, among others, in public records, public documents, official gazettes and bulletins and court rulings.

Sensitive Data: Data that affect the privacy of the Data Subject or whose improper use may generate discrimination.



Processing: Any operation or set of operations on personal data, such as collection, storage, use, circulation or deletion.

Processing Policies on Personal Data Protection: Refers to this document.

III. PRINCIPLES FOR THE PROCESSING OF PERSONAL DATA

In accordance with Article 4 of Law 1581 of 2012, the principles governing the Processing of Personal Data are as follows:

Principle of legality in data processing: The processing referred to in Law 1581 is a regulated activity that must be subject to the provisions set forth therein and in the other provisions that develop it, as well as the provisions of this Policy.

Principle of purpose: Processing must obey the legitimate purposes set forth in this Policy, which must be informed to the Data Subject.

Principle of freedom: Processing may only be carried out with the prior, express and informed consent of the Data Subject. Personal Data shall not be obtained or disclosed without prior authorization, unless there is a legal or judicial mandate that relieves the consent.

Principle of truthfulness or quality: The information subject to processing must be truthful, complete, accurate, updated, verifiable and understandable. The processing of partial, incomplete, fractioned or misleading data is prohibited.

Principle of transparency: The right of the Data Subject to obtain from the Controller or the Processor, at any time and without restrictions, information about the existence of data concerning the Data Subject shall be guaranteed.

Principle of restricted access and circulation: The Processing shall be subject to the limits derived from the nature of the Personal Data. In this sense, Processing may only be carried out by persons authorized by the Data Subject and/or by the persons provided for in the Law.

Principle of security: The information subject to processing by the Controller and/or Data Processor will be handled with the technical, human and administrative measures necessary to provide security to the records, avoiding their tampering, loss, consultation, use or unauthorized or fraudulent access.

Principle of confidentiality: All persons involved in the Processing of Personal Data are obliged to guarantee the confidentiality of the information, even after the end of their relationship with any of the tasks included in the Processing, and may only provide or communicate Personal Data when it corresponds to the development of the activities authorized by the Law.



IV. AUTHORIZATION

Taking into account that the Company's database has been collected since 1991 and has many Data Subjects, in order to guarantee the access of all of them to this Policy and to make their right to habeas data effective, the Company implemented the following measures to inform the Data Subjects about the Processing of their Personal Data and the conditions under which such Processing takes place, it carried out the following actions:

- The same "Privacy Notice" was posted on the Company's website and at the Company's facilities.
- A link was published from the corporate portal, where users can view the contents of this Policy. The portal can be viewed in 100% of the national territory and from all browsers.
- A notice was posted at the company's facilities, which contains the contents of this Policy.
- As of the date, the Company, at the time of collection of Personal Data, will request an authorization to the Data Subjects, informed about the specific purposes of the Processing for which such consent is obtained.
- The authorization of the Data Subject may be expressed by any of the following means: (i) in writing, (ii) verbally or (iii) through unequivocal conduct that allows to reasonably conclude that the authorization was granted.
- The Company will keep proof of such authorizations in an appropriate manner, respecting the principles of confidentiality and privacy of information.
- In accordance with the provisions of Article 10 of Law 1581 of 2012, this authorization will not be necessary when dealing with: (i) Information required by a public or administrative entity in the exercise of its legal functions or by court order; (ii) Public Data; (iii) Cases of medical or health emergency; (iv) Processing of information authorized by law for historical, statistical or scientific purposes; and (v) Data related to the Civil Registry of Persons.

V. PROCESSING PURPOSES

The Personal Data of the Data Subject are collected, stored, used, and exceptionally, put into circulation, by the Company in the development of its corporate purpose, with the aim of:

- To provide its products and/or services.
- Notify about changes in its products and/or services.
- To achieve an efficient communication related to its products, services, offers, alliances, studies, contests, contents, as well as those of its related companies, and to facilitate general access to their information.
- Assess the quality of the products and/or services.
- Prepare market studies.



- Prepare statistical studies.
- Carry out commercial agreements, events or institutional programs, directly or in association with third parties.
- Verify data through consultation of public databases or credit bureaus.
- Send information about activities developed by the Company or send information deemed of interest, through different means.
- To comply with the legal obligations of information to the administrative entities, as well as to the competent authorities that require it.
- To share with third parties that collaborate with the Company and that for the fulfillment of their functions must have access to some extent to the information.
- Support the Company's auditing processes.
- To guarantee the correct execution of the agreement entered into with the Data Subject.
- To comply with the obligations contracted with its customers, suppliers and employees.
- To properly execute the Company's corporate purpose.
- Any other purpose that may result from the development of the contract or commercial or labor relationship between the Company and the Data Subject.

The information provided by the Data Subject will only be used for the purposes stated herein and once the need for the Processing of the Personal Data ceases, the same shall be eliminated from the Company's databases, unless they should be kept by legal provision, or filed in secure terms in order to be disclosed only when the Law so requires.

The Company, within its corporate purpose and in order to develop the aforementioned activities, collects from its Data Subjects information regarding their Personal Data, such as: name, address, telephone number, identity document, e-mail, employment data, family data, academic training data, medical data, financial data, among others. The above is justified because ABCINFUSE S.A.S. is a company whose main corporate purpose consists of: a) Development of advertising strategies, b) Innovation in commercial displays, c) Design of advertising graphic pieces, d) Production of videos, voiceovers and audiovisual material for advertising use, e) Marketing consulting, f) Market research, g) Design and execution of BTL activations, h) All other activities inherent to the development of the corporate purpose. Furthermore, it may develop any lawful commercial or civil activity. For this reason, the Company obtains personal data from its contractors, suppliers, customers, employees, among others.

VI. PROCEDURES FOR PROCESSING OF PERSONAL DATA

The Company collects Personal Data through the documents required for customer relationship, supplier relationship, credit bureaus; for employees resumes, employment references and documents required for social security coverage, among others.

The Personal Data collected by the Company are stored through a duly licensed software, which is provided by specialized suppliers in the field, with whom confidentiality



agreements are signed for the adequate protection of the information.

1. Procedure to obtain the information

In order to protect and maintain the confidentiality of the Personal Data of the Data Subject, the Company determines that the procedure to know the information it has about the Data Subject in its databases is as follows:

- Whoever wishes to obtain the information that the Company stores in its databases, must send a letter to the address Calle 65 No. 16 - 09, Bogotá or to the following e-mail address: nicolas_gomez@abcinfuse.com, in which they must state their intention to obtain the information about the Data Subject that is in the Company's databases, and in which they must provide an address or e-mail address where they can receive an answer.
- This communication must be signed by (i) the Data Subject, who must provide sufficient proof of identity; (ii) the assignees of the Data Subject, who must provide such proof; (iii) the representative and/or attorney-in-fact of the Data Subject, upon proof of representation or power of attorney; or (iv) by stipulation in favor of or for another (hereinafter and collectively the "Interested Parties").
- The Responsible Area shall respond to the Data Subject or the Interested Party, within a maximum term of ten (10) working days from the date of receipt thereof, to the e-mail or physical address specified in the request. When it is not possible to answer the query within such term, the Data Subject or the Interested Party will be informed, stating the reasons for the delay and indicating the date on which the query will be answered, in which case the response time will be extended by five additional business days.
- The consultation of the information by the Data Subject or Interested Party shall be free of charge, provided that it is (i) no more than once every calendar month, or (ii) it is made on the occasion of a substantial modification of this Policy. In the event that the consultation is made with a frequency greater than that established, the Company may charge the Data Subject or Interested Party for the costs of shipping, reproduction and, if applicable, certification of documents, incurred for such purpose.

2. Procedure for updating, rectifying and suppressing information - Claims handling

- The Data Subject or other interested parties may, at any time, request the Company to update, rectify or delete their data and/or revoke the Company's authorization to process them, by submitting a complaint to the following address: Calle 65 No. 16 - 09, Bogotá or to the e-mail nicolas_gomez@abcinfuse.com, indicating the facts that give rise to the claim, the physical address or e-mail address to which a response should be given, and the documents to be asserted.
- If the claim is incomplete, the applicant will be required within five (5) days after receipt of the claim to correct the deficiencies. After two (2) months from the date of the requirement, without the applicant submitting the required information, it will



be understood that the claim has been abandoned.

- In the event that the person who receives the claim is not competent to resolve it, it shall be transferred to the appropriate person within a maximum term of two (2) business days and shall inform the applicant of the situation.
- Once the completed claim has been received, a legend will be included in the database stating "claim in process" and the reason for the claim, within a term no longer than two (2) business days. Such caption shall be maintained until the claim is decided.
- The maximum term to address the claim will be fifteen (15) business days from the day following the date of receipt. When it is not possible to address the claim within such term, the applicant will be informed of the reasons for the delay and the date on which the claim will be addressed, which in no case may exceed eight (8) business days following the expiration of the first term.
- It is essential to note that the request for deletion of information and the withdrawal of authorization will not proceed when the Data Subject has a legal or contractual obligation with the Company.

VII. INFORMATION AND MECHANISMS PROVIDED BY ABCINFUSE S.A.S. AS DATA CONTROLLER

Corporate name

ABCINFUSE S.A.S.

TIN

901.281.633-5

Domicile

Bogotá D.C.

Address

Calle 65 No. 16 - 09

Phone

3165273414

Area in charge

Accounting Department

E-mail

nicolas_gomez@abcinfuse.com

Website

www.abcinfuse.com



VIII. AREA RESPONSIBLE FOR THE PROCESSING OF PERSONAL DATA

The Accounting Department shall be the area in charge of receiving requests, complaints or claims from Data Subjects or other Stakeholders. This area will be in charge of the internal management necessary to guarantee a clear, efficient and timely response to the Data Subject or other Stakeholders.

At any time, the Data Subject or the Interested Parties may contact these areas to exercise their rights to know, update, rectify and delete the data and revoke the authorization.

IX. RIGHTS OF THE DATA SUBJECT

Pursuant to Article 8 of Law 1581 of 2012, the Data Subject shall have the following rights:

- To know, update and rectify their personal data with respect to the Controllers and/or Data Processors. This right may be exercised, among others, against partial, inaccurate, incomplete, fractioned, misleading data, or data whose processing is expressly prohibited or has not been authorized.
- Request proof of the authorization granted to the Data Controller, except when expressly exempted from this requirement for the Processing, in accordance with the provisions of this Policy and Article 10 of Law 1581 of 2012.
- Be informed by the Controller and/or Data Processor, upon request, regarding the use that has been made of their personal data.
- To file complaints before the Superintendence of Industry and Commerce for violations of the provisions of current regulations.
- To revoke the authorization and/or request the deletion of the data.
- Access free of charge to their personal data that have been subject to Processing.
- The aforementioned rights may be exercised by the Data Subject or any of the Stakeholders.

X. DUTIES OF THE DATA CONTROLLER

Pursuant to Article 17 of Law 1581 of 2012, the Data Controller shall have the following duties:

- Guarantee to the Data Subject, at all times, the full and effective exercise of the right of habeas data.
- Request and keep, under the conditions set forth in this Policy and the Law, a copy of the respective authorization granted by the Data Subject.
- Duly inform the Data Subject about the purpose of the collection and the rights that the Data Subject has pursuant to the authorization granted.
- Keep the information under the necessary security measures to prevent its adulteration, loss, consultation, use or unauthorized or fraudulent access.
- Ensure that the information provided to the Data Processor is truthful, complete, accurate, current, verifiable and understandable.



- Update the information, communicating in a timely manner to the Data Processor, all developments with respect to the data previously provided and take other necessary measures to ensure that the information provided to it is kept up to date.
- Rectify the information when it is incorrect and communicate the relevant information to the Data Processor.
- To provide the Data Processor, as the case may be, only data whose processing is previously authorized.
- To demand from the Data Processor at all times, respect for the security and privacy conditions of the Data Subject's information.
- Process queries and claims from the Data Subject or Interested Parties.
- Inform the Data Controller when certain information is under discussion by the Data Subject, once the claim has been filed and the respective process has not been completed.
- Inform the Data Subject or the Interested Parties, upon request, about the use given to their data.
- Inform the data protection authority when there are violations to the security codes and there are risks in the administration of the Data Subjects' information.
- Comply with the instructions and requirements given by the Superintendence of Industry and Commerce.

XI. VALIDITY OF THE PROCESSING POLICY AND OF THE DATABASES

This Personal Data Processing Policy of ABCINFUSE S.A.S., is in force as of July 01, 2019 and while the contractual, commercial or labor relations with the Data Subject remain in force, including the term required to perform all activities aimed at fulfilling the purposes of the Processing.

Likewise, the Processing of Personal Data by the Company will be carried out while the contractual, commercial or labor relations with the Data Subject remain in force, including the term required to execute all the activities aimed at fulfilling the purposes of the Processing.

Notwithstanding the foregoing, personal data must be retained when required for the fulfillment of a legal or contractual obligation.

XII. OTHER PROVISIONS

The Company, for the Processing of Sensitive Data, will inform the Data Subjects: (i) that since it is this type of data, it is not obliged to authorize its Processing and (ii) will inform which data is Sensitive and the purpose of its Processing.

For the purposes of the Processing of Personal Data of children and teenagers, the Company shall respond to and respect the best interests of the children and teenagers and shall also ensure respect for their fundamental rights. Additionally, the Company shall request authorization from the representative of the child or teenager in order to carry out





the Processing of the Personal Data.

The Company will collect, store, use or circulate the Personal Data for which it has the proper authorization, for the term that is reasonable and necessary.

This policy is effective as of July 1, 2016.

NICOLAS AUGUSTO GOMEZ VELEZ

Legal Representative

ABCINFUSE S.A.S.

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