

ESCOBAR SALAS CONSULTORES´ PERSONAL DATA TREATMENT AND PROTECTION POLICY

The company **Escobar Salas Consultores** in accordance with the provisions of Law 1581/2012, Decree 1377/2013, Decree 1074/2015, and other regulations that complement, subrogate or repeal them, adopts this policy for the processing and protection of personal data, which will be socialized to all holders of the data collected or that in the future will be obtained in the exercise of commercial or labor activities.

OBJECTIVE:

The personal data policy seeks to guarantee the holder´s right to inform, know, update, rectify or suppress the information provided, or that has been collected from him / her, whatever the means, and under the use of the different channels enabled for the effect.

PERSONAL DATA HOLDER ´S RIGHTS:

Escobar Salas Consultores, as responsible for the treatment of personal data delivered or collected from public sources of information of customers, suppliers, contacts and/or persons with a commercial relationship, in compliance with Colombian law 1581 of 2012 and decree 1377 of 2013, informs to holders of the personal data that they have the following rights: The rights as holder of the data are those provided in the Constitution and the law, especially the right to know, update, rectify and delete its personal information; as well as the right to revoke the consent granted for the processing of personal data and in general all the rights set forth in article 8 of law 1581.

ESCOBAR SALAS CONSULTORES OBLIGATION:

In accordance with current regulations on personal, private and sensitive data, (see definitions in Law 1581/2015) the company will use this information only and exclusively to comply with the functions and obligations, from various operations carried out through electronic means, telephone or in person, as well as the relationships that exist with our employees, managers and dependents. In turn, it will have such information for statistical, marketing, commercial, contact, documentation, or notifications, among others, unless the user expressly or verbally states that his or her information is deleted, rectified or deleted. of data.

The policy should be available so that the holder can know what will be the management that will be given to the information provided or collected. Escobar Salas Consultores will request authorization for the handling of their data to the holder, in case the law requires it, which can be done orally or in writing.

The following will be duties in front of the user:

- Request authorization from the holder for the processing of their data in the respective databases in cases that the law requires.
- Recognize the exercise of the fundamental right of habeas data.
- Use the information in conditions of maximum security to prevent its loss, manipulation, adulteration or fraudulent use.
- Update or rectify the information when so requested by its holder.
- The others established by law.

USE OF PERSONAL DATA BY ESCOBAR SALAS CONSULTORES:

The data will be processed for commercial, contractual, customer service, marketing, statistical, contact, documentation, or notification purposes. The personal data collected will

be stored, used, deleted, processed, compiled, transferred, submitted to circulation, updated and arranged as established by the corresponding laws

Escobar Salas Consultores, as the company responsible for the personal data obtained through its different channels, makes available to the interested parties, the lines of attention mentioned below, for the attention of requirements related to the processing of personal data:

IDENTIFICACIÓN DEL RESPONSABLE DEL TRATAMIENTO:

Below is the contact information of the person responsible for the processing of personal data, so that interested parties can communicate through these channels, if considered necessary:

- Company: Escobar Salas Consultores.
- RUT number: 79.948.560-1.
- Responsible: Mauricio Escobar
- Address: Av. 116 No. 50 A - 09. Of. 206 Bogotá, Colombia
- Mobile: (57) 316 620 4611
- Email: gerencia@escobarsalasconsultores.com

INFORMATION SECURITY MEASURES:

In development of the security principle established in Law 1581 of 2012, Escobar Salas Consultores will implement the technical, human and administrative measures that are necessary to grant security to the records, by means of which their adulteration, loss, consultation, use or unauthorized or fraudulent access.

ACCEPTANCE:

The holder of the information accepts the processing of their personal data in accordance with the terms of this document, when providing their data.

CLAIMS:

In accordance with the provisions of Law 1581/2012: the Holder or his/her successors in title who consider that the information contained in a database must be subject to correction, updating or deletion, or when they notice the alleged breach of any of the duties, may present a claim with the person responsible for the Treatment or the Person in Charge of the Treatment, which will be processed as follows: The claim will be formulated by means of a request addressed to the person in charge of the Treatment or to the Person in Charge of the Treatment, with the identification of the Holder, the description of the facts that give rise to the claim, the address, and accompanied by the documents that it wants to assert. If the claim is incomplete, the interested party will be required within five (5) days after receipt of the claim to correct the faults. After two (2) months from the date of the request, without the applicant submitting the required information, it shall be understood that the claim has been abandoned. The claim can be made by email sent to: gerencia@escobarsalasconsultores.com

VALIDITY:

This Policy is effective from the date of its publication