

DATA POLICY

GRUPO CINCOVEINTINCO S.A.S, with offices at Calle 85 No 19C-12 in Bogota (hereinafter referred to as the "Company"), makes available its Personal Data Use and Protection Policy (the "Policy") to the natural persons (the "Staff") whose personal data will be processed by the Company through its platform ONEHOTLINE (the "Platform").

Through this Policy the Company informs the Staff how the Company will process their personal data collected through its Platform, acting the Company whether like a Data Controller or a Data Processor, and it informs about the Staff's rights concerning the processing. This policy also establishes the scope and purpose of the process.

The Staff understands and acknowledges that their personal data will be done in compliance with Law 1581/2012 and of Colombia.

1. Definitions

- a. **"Authorization"**: Prior, explicit, and informed consent of the Data Subject to carry out the Processing of personal data.
- b. **"Personal Data"**: Any information linked or capable of being linked to one or more specific or identifiable natural persons.
- c. **"Data Processor"**: Natural or legal person, public or private, who carries out the Processing of personal data on behalf of the Data Controller.
- d. **"Data Controller"**: Natural or legal person, public or private, who decides on the database and/or the Processing of the data.
- e. **"Holder"** of Personal Data or **"Staff"**: Natural person whose personal data is the subject of processing.
- f. **"Processing of Personal Data"**: Any operation or set of operations on personal data, such as collection, storage, use, circulation, or deletion.
- f. **"Transfer"**: It is the Processing of Personal Data that involves the communication thereof inside or outside the territory of the Republic of Colombia when the Processing Officer intends to Process such Personal Data on behalf of the Responsible for Processing.
- g. **"Transmission"**: This is the Personal Data Processing activity whereby the same are communicated internally or to third parties, inside or outside the territory of the Republic of Colombia, when said communication is intended to carry out any Processing activity by the recipient of the Personal Data.
- h. **"Sensitive Data"**: The Data that affects the privacy of the Holder or which misuse may generate discrimination, such as those that reveal racial or ethnic origin, political orientation, religious or philosophical convictions, membership in trade unions, social organizations, human rights organizations or that promote the interests of any political party or that guarantee the rights and guarantees of opposition political parties, as well as data relating to health, sexual life, and biometric data.

2. The Staff's Rights on the processing of their Personal Data

The Staff is entitled to the following rights:

- a. To know, update and rectify their personal data.
- b. To request proof of the authorization granted to the Data Controller, except when expressly exempted by law as a requirement for the Processing.
- c. To be informed by the Data Controller or the Data Processor, upon request, regarding the use made of his or her personal data.
- d. To file complaints before the Superintendencia de Industria y Comercio for infringements of the provisions of the law and other regulations that modify, add to or complement it.
- e. To revoke the authorization and/or request the erasure of his or her data when the Processing does not respect the constitutional and legal principles, rights and guarantees.
- f. To access, free of charge, to their personal data that have been the subject of Processing.

3. Duties of the Company acting as a Data Controller

When acting as a Data Controller, the Company will comply with the following duties, without prejudice to the other provisions of the law and others governing their activity:

- a. Guarantee the Data Subject, always, the full and effective exercise of the right to habeas data.
- b. Request and keep, under the conditions provided for in the law, a copy of the respective authorization granted by the Data Processor.
- c. Duly inform the Data Subject about the purpose of the collection and the rights that he/she has by virtue of the authorisation granted.
- d. Preserve the information under the security conditions necessary to prevent its adulteration, loss, consultation, unauthorized or fraudulent use or access.
- e. Guarantee that the information provided to the Data Processor is true, complete, accurate, up to date, verifiable and comprehensible.
- f. Update the information, communicating in a timely manner to the Data Processor, all new developments with respect to the data previously provided and take other necessary measures to ensure that the information provided to the Data Processor is kept up to date.
- g. Rectify the information when it is incorrect and communicate the corresponding information to the Data Processor.
- h. Provide to the Data Processor only data whose Processing has been previously authorized in accordance with the law herein.
- i. Demand that the Data Processor always respect the conditions of security and privacy of the Data Subject's information.

- j. Process queries and complaints formulated under the terms set out in the law.
- k. Adopt an internal manual of policies and procedures to ensure adequate compliance with the law and to deal with queries and complaints.
- l. Notify the Data Processor when certain information is under discussion by the Data Subject, once the complaint has been filed and the respective process has not been completed.
- m. Report at the request of the Data Subject on the use given to his or her data.
- n. Inform the data protection authority when there are violations of the security codes and there are risks in the administration of Holders' information.
- o. Comply with the instructions and requirements issued by the Superintendencia de Industria y Comercio.

4. Duties of the Company acting as a Data Processor

When acting as a Data Processor, the Company will comply with the following duties, without prejudice to the other provisions of the law and others governing their activity:

- a. Guarantee that Holders, at all times, the full and effective exercise of the right to habeas data.
- b. Preserve the information under the security conditions necessary to prevent its adulteration, loss, consultation, unauthorized or fraudulent use or access.
- c. Timely updating, rectification, or deletion of data under the terms of this law.
- d. Update the information reported by the Data Controllers within five (5) working days of receipt.
- e. Process queries and complaints made by the Holders under the terms set forth under the law.
- f. Implement an internal manual of policies and procedures to ensure proper compliance with this law and, in particular, to deal with queries and complaints from Holders.
- g. Register in the database the legend "complaint in process" in the manner regulated by the law.
- h. Insert in the database the legend "information under judicial discussion" once notified by the competent authority about judicial proceedings related to the quality of the personal data.
- i. Refrain from circulating information that is being disputed by the Holders and whose blocking has been ordered by the Superintendence of Industry and Commerce.
- j. Provide access to information only to those who can have access to it.
- k. Inform the Superintendencia de Industria y Comercio when there are violations of the security codes and there are risks in the administration of Holders' information.
- l. Comply with the instructions and requirements issued by the Superintendencia de Industria y Comercio.

5. Processing of Personal Data

The Personal Data processed by the Company will be subject exclusively to the purposes indicated in this document:

- a. To share the Staff's Personal Data with third parties to allow them to investigate, and to follow up the reports filed by the Staff.
- b. To contact the Staff to follow up the reports made on the Platform.
- c. To provide Company's services.
- d. To inform the Staff about new services to be delivered by the Company and/or changes in the same.
- e. To store the Staff's personal data on the Platform.
- f. To evaluate the quality of the Company's services.
- g. To send to the physical mail, electronic mail, cellular or mobile device, via text messages or through any other analogous and/or digital means of communication created or to be created, commercial information, advertising, publicity, etc. or to be created, commercial, advertising or promotional information about the services, events and/or commercial promotions, with the purpose of promoting, inviting, directing, executing, informing and, in general, to carry out campaigns, campaigns, events and/or promotions and, in general, to carry out campaigns, promotions or contests of a commercial or advertising nature, carried out by the Company and/or third parties;
- h. To support internal or external auditing processes.
- i. To provide personal data to insurance companies when strictly necessary to cover the Company's risks.

If a personal data is provided, such information will be used only for the purposes stated herein, and therefore, the Company will not proceed to sell, license, transmit, or disclose unless: (i) there is express authorization to do so; (ii) it is necessary in order to allow contractors or agents to provide the services entrusted; (iii) necessary in order to provide our services and/or products; (iv) it is required or permitted by the law.

6. Contact information for inquiries and complaints

The Staff may present any inquiries or complaint, before the Company, regarding the rights contained on this document and on the law by: i) sending an email to info@525.com.co; ii) by calling the following telephone number: +57 601 6231021; or iii) by sending physical correspondence, from Monday to Friday, from 8:00 a.m. to 5:00 p.m., to the following address: Calle 85 No 19c-12 (201). The person from the Company in charge of reviewing such inquiries and complaints will be Diana Martinez.

Any complaint must contain the identification of the Staff, the description of the facts that give rise to the complaint, the address, and accompanying documents to be asserted.

Regardless of the means, The Company will keep evidence of the inquiry or complaint and its response.

6.1. Inquiries

If the Holder is enabled to formulate the inquiry, The Company will collect all the information about the Holder contained in its individual record or related to the Holder within the databases of The Company and will provide it to the Holder.

The person responsible for answering the inquiry will answer the Holder considering he/she is entitled thereto because he/she is the Holder of the Personal Data, his/her successor in title, proxy, representative, when it has been stipulated by another or for another, or the legal representative in the case of minors. This response will be sent within ten (10) business days from the date the request was known by The Company.

If the request cannot be addressed within ten (10) business days, the Holder will be contacted by the Company to inform the reasons for which the status of his/her request is in process and stipulating a date when the inquiry will be dealt with, which in no case may exceed five (5) working days following the expiry of the first term.

6.2. Complaints

The Holder or his assignees who consider that the information contained in a database should be amended, updated or deleted, or when they notice the alleged breach of any of the duties contained in the law, may file a complaint with the Data Controller or the Data Processor.

If the complaint is incomplete, The Company will request the complainant within five (5) after the reception date of the complaint to complete the missing information or to remedy the failures. If the complainant fails to submit the required documentation and information within two (2) months after the date of the initial complaint, he/she shall be deemed to have waived the complaint.

If for any reason the person receiving the complaint at The Company is not competent to solve it, he/she will transfer it to the person in charge within two (2) business days of receiving the complaint, and shall inform the complainant of this.

Once the complaint has been completed, a legend will be included in the Database of The Company where the Holders' Data subject to complaint will read "complaint in process" and its explanation, within two (2) business days. This legend must be maintained until the complaint is settled.

The maximum term to address the complaint shall be fifteen (15) business days from the day following the date of receipt of the complaint. When it is not possible to address the

complaint within such a term, the Holder will be informed of the delay's reasons and of the new date in which the complaint will be resolved. This time frame may in no case exceed eight (8) business days following the expiration of the first term.