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1. CONSIDERATIONS

With the issuance of Law 1581 of 2012 and Decree 1377 of 2013, the constitutional right that everyone has to know, update and rectify the information that has been collected about them in databases or physical or digital files was developed. PROENFAR S.A.S. As the company Responsible for the Processing of Personal Data by virtue of commercial or other relationships with third parties, it generated this document on the Personal Data Policy PROENFAR S.A.S., (hereinafter "Policy").

PROENFAR S.A.S., does not sell your Personal Data to third parties. In this Policy we explain how PROENFAR S.A.S., uses and protects your personal data and for what purposes.

2. TARGET

The objective of this Personal Data Policy PROENFAR SAS, (hereinafter "Policy"), is to comply with Statutory Law No. 1581 of 2012, its Regulatory Decree 1074 of 2015 (Chapter 25) and other regulations that govern Protection of Personal Data, or those that complement, substitute, modify or repeal them and in particular, guarantee the right of Habeas Data of the Holders of Personal Data.


In compliance with current regulations and guiding principles, the Responsible for the Treatment will only collect and process Personal Data that is strictly necessary for the purposes established in this Policy and/or in the Privacy Notices and that have been previously informed to the Owners.

3. SCOPE

This Policy is applicable both to PROENFAR SAS, as Responsible for the Treatment and to its direct and indirect employees, as well as to all those third parties, natural or legal, to whom it transmits or transfers Personal Data of the Groups of Interest of the Responsible of the Treatment, when they perform any Treatment on them.

4. IDENTIFICATION OF THE RESPONSIBLE FOR THE TREATMENT

NAME	PROENFAR S.A.S.
HOME	BOGOTÁ D.C.
ADDRESS	CALLE 10 NO. 34 A - 13
EMAIL	datospersonales@proenfar.com
PBX	(57-1) 3648686

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5. DEFINITIONS

For the purposes of this Policy, it will be understood by:

ADOLESCENT: People between 12 and 18 years of age (Childhood and Adolescence Code, article 3).

AUTHORIZATION: Prior, express and informed consent of the Personal Data Holder to carry out the Treatment of their personal data, which can be collected in a (i) written, (ii) oral or (iii) way through unequivocal behaviors, which allow reasonably conclude that it granted the authorization.

PRIVACY NOTICE: Physical, electronic document or in any other format generated by the Responsible For The Treatment, which is made available to the Owner for the Treatment of their personal data. In the Privacy Notice, the Owner is informed of the information regarding the existence of the information processing policies that will be applicable, the way to access them and the characteristics of the treatment that is intended to be given to the Personal Data.

DATABASE: Organized set of physical or electronic (digital) personal data that is subject to manual or automated Treatment.

PERSONAL DATA: Any information linked or that may be associated with one or more specific or determinable natural persons. The nature of Personal Data can be public, semi-private, private or sensitive.

PRIVATE DATA: It is the data that due to its intimate or reserved nature is only relevant for the Holder.

PUBLIC DATA: It is the data classified as such according to the mandates of the law or the Political Constitution and that which is not semi-private, private or sensitive. The data relating to the marital status of individuals, their profession or trade, their status as a merchant or public servant and those that can be obtained without any reservation are public, among others. By its nature, public data may be contained, among others, in public records, public documents, gazettes and official gazettes, which are not subject to reservation.

SENSITIVE DATA: Are those that affect the privacy of the Personal Data Holder or whose improper use may generate discrimination, such as those that reveal racial or ethnic origin, political orientation, religious or philosophical convictions, membership of unions, organizations social, human rights or that promotes the interests of any political party or that guarantee the rights and guarantees of opposition political parties as well as data related to health, sexual life and biometric data (fingerprint, iris of the eye , voice, way of walking, palm of the hand or facial features, photographs, videos, among others).


To the Personal Data of Boys, Girls and / or Adolescents, the same rules and procedures will be applied as to Sensitive Data, and no Treatment will be given that may violate or threaten their physical, mental and emotional development.

SEMI-PRIVATE DATA: They are those that do not have an intimate, reserved, or public nature and whose knowledge or disclosure may be of interest not only to its owner, but to a group of people or society in general. Semi-private data is understood, among others, as information related to social security and financial and credit behavior.

RIGHT OF HÁBEAS DATA: In accordance with the provisions of article 15 of the Political Constitution of Colombia, it is the right that all people have to know, update and rectify the information that has been collected about them in data banks and in archives of public and private entities.

Within the Habeas Data Law, there are the following rights:

Rights	Definition
Right of access or consultation	The Owner's right to be informed by the Treatment Manager, or the Treatment Managers, upon request, regarding what Personal Data is included in the Databases of the Treatment Manager, origin, use and purpose that have been given to them.
Claim for correction or update	Right of the Holder to update, rectify or modify partial, inaccurate, incomplete, fractioned data, which are misleading.
Suppression claim	Right of the Holder to have data deleted that is inappropriate, excessive or that does not respect the principles, rights and constitutional and legal guarantees or those whose Treatment is expressly prohibited or has not been authorized. The request to delete the information will not proceed when the Holder has a legal or contractual duty to remain in the Database.

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Claim of revocation of authorization	Right of the Holder to revoke the authorization previously given for the processing of their personal data. The revocation of the authorization will not proceed when the Holder has a legal or contractual duty to remain in the Database.
Claim of infringement	Right of the Holder to request that the breach of the regulations on the Protection of Personal Data be remedied.
Consultation of the authorization for the Treatment	Right of the Holder to request proof of the Authorization granted for the Processing of their Personal Data
Complaint to the SIC	Right to submit complaints to the Superintendency of Industry and Commerce for infractions in the field of Protection of Personal Data, once the consultation or claim process has been exhausted before the person responsible for the treatment or person in charge of the treatment

MANAGER OF THE TREATMENT: Natural or legal person, public or private, that by itself or in association with others, carries out the Treatment of Personal Data on behalf of the Responsible for the Treatment.

For the purposes of this Policy, those reported in the National Registry of Databases are understood as Treatment Managers.

GROUPS OF INTEREST: For the purposes of this Policy, Interest Groups shall be understood as all groups of natural persons with respect to which the Person in Charge of Treatment and / or those in Charge of Treatment carry out any Personal Data Processing.

BOY OR GIRL: People between 0 and 12 years old (Code for Children and Adolescents, article 3).

PERSONAL DATA PROTECTION OFFICER: Person or Area Responsible for dealing with Complaints and Claims that are presented regarding the Protection of Personal Data, designated in the Policy.

PQR'S: Queries and claims regarding the Protection of Personal Data.

PQR's classes	Definition
Query	Request for information submitted by the Holder, his successors in title or attorney-in-fact, by the means established for this purpose, tending to know the information that he has in the databases administered by the Responsible for the Treatment, origin, use and purpose that is given to him. Have given to them.
Claim	Request submitted by the owner, his successors in title or attorney-in-fact by the means established for this, when he considers that the information contained in a database managed by the Responsible For The Treatment should be subject to correction, updating, rectification or deletion or when it is intended revoke authorization.


DATA PROTECTION: are all the technical, human and administrative measures that are necessary to grant security to the records avoiding their adulteration, loss, consultation, use or unauthorized or fraudulent access.

RESPONSIBLE FOR THE TREATMENT: Natural or legal person, public or private, that by itself or in association with others, decides on the Database and / or the Treatment of the data.

For the purposes of this Policy, PROENFAR S.A.S.

OWNER: For the purposes of Law 1266 of 2008, it is the natural or legal person to whom the information that rests in a database refers and subject to the right to habeas data and other rights and guarantees enshrined in said Law and the regulations that complement, modify, substitute or repeal it. For the purposes of Law 1581 of 2012, it is the natural person whose personal data is subject to Treatment.

TRANSFER: The Data Transfer takes place when the Responsible and / or Person in Charge of the Treatment of personal data, located in Colombia, sends the

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information or personal data to a recipient, who in turn is Responsible for the Treatment and is inside or outside from the country.

TRANSMISSION: Treatment of Personal Data that implies the communication of the same within or outside the territory of the Republic of Colombia when it is intended to carry out a Treatment by the Manager on behalf of the Responsible.

TREATMENT: Any operation or set of operations on personal data, such as the collection, storage, updating, use, circulation, Transfer, Transmission or deletion.

6. GUIDING PRINCIPLES

The following are the Guiding Principles regarding the Protection of Personal Data, and they will apply to the Treatment carried out by the Treatment Manager, their employees and all those natural or legal third parties to whom they Transmit or Transfer Personal Data of the Holders that comprise their Groups of Interest, when they carry out any Treatment on them:

PRINCIPLE OF LEGALITY: The Treatment of Personal Data will be carried out in accordance with the legal requirements established in Statutory Law 1581 of 2012 and its regulatory decrees.


PRINCIPLE OF PURPOSE: The Processing of Personal Data must obey a legitimate purpose in accordance with the constitution and the Law, which must be informed to the Holder.

PRINCIPLE OF FREEDOM: The Treatment can only be carried out with the prior, express and informed consent of the Holder. Personal data may not be obtained or disclosed without prior authorization, or in the absence of a legal or judicial mandate that relieves consent. Public Data are excepted from this principle, which may be subject to Treatment without requiring authorization from the Holder, in accordance with the provisions of Law 1581 of 2012 and its Regulatory Decree 1074 of 2015.

PRINCIPLE OF TRUTH OR QUALITY: The information subject to Treatment must be true, complete, exact, updated, verifiable and understandable. Processing of partial, incomplete, fractioned or misleading data is prohibited.

PRINCIPLE OF TRANSPARENCY: In the Treatment, the right of the Holder to obtain at any time and without restrictions, information about the existence of data concerning him must be guaranteed.

PRINCIPLE OF ACCESS AND RESTRICTED CIRCULATION: Personal data, except public information, may not be available on the Internet or other means of dissemination or mass communication, unless access is technically controllable to provide restricted knowledge only to the Holders or authorized third parties.

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SECURITY PRINCIPLE: The information subject to Treatment must be protected through the use of technical, human and administrative measures that are necessary to provide security to the records, avoiding their adulteration, loss, consultation, use or unauthorized or fraudulent access.


PRINCIPLE OF CONFIDENTIALITY: All persons who intervene in the Processing of personal data are obliged to guarantee the reservation of the information, even after the end of their relationship with any of the tasks that the Treatment comprises.

7. TREATMENTS TO WHICH THE PERSONAL DATA AND ITS PURPOSES WILL BE SUBMITTED

For the purposes of this Policy, the Treatment Manager directly or through Treatment Managers, may collect, store, use, circulate, update, delete or carry out any other type of Manual or Automated Treatment on the Personal Data of their Groups of Interest, adjusting at all times to the provisions of current regulations and for the purposes described below:


7.1. GENERAL PURPOSES FOR THE PROCESSING OF PERSONAL DATA OF ALL INTEREST GROUPS

- National and international transmission and transfer and storage and custody of information and / or Personal Data in physical files or own servers and / or third parties, located inside or outside the country, in countries considered safe or secure by the Superintendency of Industry and Commerce, and in countries that are not safe or secure, as long as it is required for the development of the company's own activities and relations with the different Stakeholders, their employers or contractors.
- Registration and control of entry and exit of documents.
- Analysis and preparation of programs that generate a social impact for the Stakeholders of the Responsible for The Treatment
- Announcement and execution of programs, meetings, trainings and events, as well as the preservation of documentary records of the same, such as attendance lists, photographs, voice recordings and / or videos, which may be used for internal publications and / or or external own and / or clients or strategic, national and international allies.
- Preparation and implementation of surveys and interviews.
- Sending communications related to the purposes contained in this Policy, the activities of the Responsible for The Treatment or strategic allies, advertising, marketing, promotions, events, marketing and promotion of products and / or services, content updates on the website , alliances and

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benefits, through the professional, business and / or personal contact data of the Holders, including, but not limited to: landline and / or mobile phone, physical and / or electronic mail, SMS text messages and / or or MMS, social networks, electronic media and / or any other means of communication.

- Controls, statistics and history of the relationships maintained with the Holders of the different Interest Groups.
- Internal indicators.
- Basis for decision making.
- Registration and control of access and entry to the facilities of the Treatment Manager through video surveillance.
- Security of the facilities and people who enter them and emergency care.
- Visitor entry control.
- Pollution prevention.
- Compliance with national and international norms and standards, including, but not limited to: BASC, SAGRILAF and OEA.
- Support in internal and / or external auditing processes, fiscal audits, consultancies and implementation of improvement plans.
- Compliance with current regulations.
- Reports to competent administrative and judicial authorities.
- Attention to requests made by competent administrative and judicial authorities.
- Preparation and presentation of claims and complaints before the competent authorities, as well as exercising the right of defense in any administrative and / or judicial process.
- Compliance with the obligations derived from the contracts signed between the Responsible for The Treatment and the Data Holders, or with their contracting parties or employers.
- Internal or external communications.
- Financial and accounting management, creation of third parties, and registration in the Databases of the Responsible for The Treatment.
- Sending information to the Holders, related to the corporate purpose of the Responsible for The Treatment or its strategic allies.
- Attention of PQR's.
- Applications for credit or financial services.
- Issuance of policies and insurance.
- Compliance with guidelines issued by the National Government and local authorities for the prevention of the spread of COVID-19.
- Purposes indicated in the authorization granted by the Owner and / or in the Privacy Notices.


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7.2. PURPOSES FOR THE PROCESSING OF PERSONAL DATA OF MEMBERS OF THE SHAREHOLDERS ASSEMBLY, BOARD OF DIRECTORS AND / OR COLLABORATORS OF THE SHAREHOLDER AND / OR RELATED COMPANIES

- Call to meetings.
- Settlement of Minutes.
- Sending information related to the activities of the Responsible For The Treatment.
- Guarantee the effective exercise of the rights of the Holders.
- Hotel reservations, air or land tickets, delivery of gasoline vouchers and tolls, per diem and vehicle request, among others.
- Preparation of legal documents.
- Recognition of achievements and / or important dates.
- Transmission and Transfer of information for credit applications, financial services and / or issuance of policies, as well as for the relationship with third parties Clients, Contractors, Suppliers and / or Strategic Allies.


7.3. PURPOSES FOR THE PROCESSING OF PERSONAL DATA OF THE LEGAL SHAREHOLDER REPRESENTATIVE

- Call to meetings.
- Establishment of Minutes.
- Sending information related to the activities of the Responsible For The Treatment.
- Guarantee the effective exercise of the rights of the Holders.
- Hotel reservations, air or land tickets, delivery of gas vouchers and tolls, per diem and request for vehicles, among others.
- Preparation of legal documents.
- Recognition of achievements and / or important dates.
- Transmission and Transfer of information for credit applications, financial services and / or issuance of policies, as well as for linking with third-party Clients, Contractors, Suppliers and / or Strategic Allies.
- Signature and execution of contracts.
- Registration with the Chamber of Commerce, DIAN, and other administrative and / or judicial entities in which you must register.
- Signature of Financial Statements and government documents, Chamber of Commerce, among others.
- Reports to government entities..

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7.4. PURPOSES FOR THE PROCESSING OF PERSONAL DATA OF NATIONAL AND FOREIGN CLIENTS, ACTIVE AND INACTIVE. POTENTIALS AND THEIR COLLABORATORS


- Knowledge of the active and potential client.
- Analysis of market behavior, profiling and segmentation.
- Assignment of representatives to initiate commercial contact.
- Offer of goods and / or services from the Responsible For The Treatment, Headquarters, business group, related companies and / or their strategic allies.
- Compliance with the Compliance Policy.
- Consultation of administrative, judicial and / or disciplinary records in national and international restrictive lists and Operators of Commercial, Financial and Credit Information.
- Verification of compliance with legal and technical requirements.
- Request and verification of references.
- Subscription of the link form, Security Questionnaire-Signed Manifestation and Declaration of Income Origin, among others.
- Carrying out commercial and security visits.
- Negotiation of contract terms and / or purchase and / or service orders.
- Subscription and execution of contracts and attached documents and / or legalization of purchase and / or service orders.
- Administration of information and communication systems.
- Statistical studies of credit risk behavior.
- Approval and renewal of credit quota.
- Own patrimonial information and that of partners or shareholders, to support or guarantee the payment of the credit.
- Issuance and remission of quality certificates.
- Accounting and billing management.
- Management of transport, nationalization and delivery of goods.
- Identification of debtors and co-debtors.
- Portfolio recovery management through persuasive, extrajudicial and / or judicial collection.
- Customer Management.
- Updating of information.
- Customer loyalty.
- Transmission and transfer of contact data to the Data Processors, contractors and suppliers, parent company, business group, related companies and / or strategic allies, so that they can process the Owner's Personal Data, for the purposes indicated in the Policy.

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- Evaluation of the quality of the goods and / or services provided by the Responsible For The Treatment and conducting satisfaction surveys on the products and / or services provided.
- Attention to claims, processes of rejection and fulfillment of guarantees and payment of costs of destruction of goods (in the cases that apply)

7.5. PURPOSES FOR THE PROCESSING OF PERSONAL DATA OF APPLICANTS, DIRECT AND INDIRECT EMPLOYEES, APPRENTICES, ACTIVE AND INACTIVE, BENEFICIARIES AND FAMILIES

- Collection of resumes directly from the Holder or from third natural or legal persons who send them, either independently, or by Commission of the Person Responsible for Treatment.
- Participation in selection processes
- Resume analysis
- Interview
- Psychotechnical, knowledge and / or skills tests, and / or those required
- Consultation of administrative, judicial and / or disciplinary records
- Request and verification of references
- Verification of academic and employment information
- Home visits
- Medical, psychotechnical, and competency tests that are required
- Deployment of the SG-SST and compliance with current regulations that regulate the matter, especially, collection of sociodemographic data and psychosocial risk.
- Preservation of the resume and results of the selection processes for future personnel hiring processes and / or for compliance with current legal regulations.
- Bonding process.
- Preservation of resume with the respective supports.
- Preparation and signing of the labor and / or learning contract with its respective annexes and uploading the Learning contract on the platform indicated by SENA for the purposes.
- Affiliation of the Employee or Apprentice and their relatives and / or beneficiaries to an EPS.
- Affiliation with the ARL.
- Affiliation with the Family Compensation Fund.
- Facilitate access to family allowances and services.
- Affiliation with the Pension and Severance Funds.
- Identification.
- Process of induction and socialization of relevant information and documents, and recording of their knowledge and understanding.

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- Delivery of computer equipment and work tools.
- Assignment of telephone lines.
- Assignment of transport routes in accordance with the residence address.
- Inclusion in individual life, home and car policies, and / or those taken by the company for the benefit of its direct and indirect collaborators and / or apprentices and management of protection and benefits.
- Adherence to the Collective Agreement.
- Control of contract renewal and changes in the contracting modality.
- Work scheduling and assignment of functions, roles and profiles associated with the position held.
- Register of information on direct and indirect employees, active and inactive, beneficiaries and families, for the development of social security and parafiscal affiliation and payment activities, payroll, bonuses and bonuses, vacations, recognition of pension rights and settlements.
- Authorization for the withdrawal of severance pay.
- Issuance of labor and / or learning certifications for third parties indicated by the Holder.
- Management of permits, licenses and authorizations.
- Management of sanctions, reprimands, calls for attention, discharge and dismissal with or without just cause.
- Disciplinary processes and record of disciplinary history.
- Fulfillment of the obligations of the Responsible For The Treatment, by virtue of the current legal regulations.
- Training and education for direct and indirect staff, apprentices, beneficiaries and / or families.
- Skills and performance evaluations.
- Discounts on salary allowed in current regulations and practice and registration of embargoes at the request of the competent authority.
- Delivery of endowment.
- Contracting with third parties for services that benefit direct and indirect employees, beneficiaries and families.
- Compliance with current regulations on health and safety at work SG-SST, including, but not limited to: collection and analysis of health information and socio-demographic profile of direct and indirect employees, active and inactive, research and indicators of absenteeism, incidents and accidents, occupational medical evaluations, evaluation of disabilities, reasons and recurrences, reincorporation and / or job readjustment, implementation and follow-up of recommendations made by the occupational physician, EPS and / or ARL, qualification processes for diseases and accidents of work, road safety, report and investigation of incidents and accidents at work, inspections and studies of the workplace, verification of the use of protective elements, identification of hazards and evaluation of unsafe behaviors,


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processes of observation of safe behaviors and monitoring of commitments, analysis of Aspects and Risks in the Task (ART), by psychosocial risk theory, prevention campaigns including prevention for the spread of Coronavirus - COVID-19, chemical risk survey, monitoring active breaks / work gymnastics.

- Permission to work at heights, medium voltage electrical work and / or welding.
- Delivery of personal protection elements (PPE).
- Inspections for protection against falls.
- Record of the use of the Breastfeeding Room (when applicable).
- Hotel reservations, air or land tickets, delivery of gas vouchers and tolls, per diem and request for vehicles, among others, in case of transfer by direct and indirect employees.
- Provision of information to Contractors and Suppliers, for the execution of the contracts signed between them and the Responsible For The Treatment.
- Creation and administration of users and passwords to enter the different applications, technological and computer equipment, email accounts and web pages that require it.
- Creation and control of access and modification of documents.
- Identification and monitoring of income and expenses of personnel, payroll and promotions.
- Transfer of proof of payment of contributions to the social security and parafiscal system and proof of training carried out to collaborators, sent to the Contracting Parties of the Treatment Manager, when required for the payment of goods and / or services provided by the latter in Contractor and / or Supplier quality.
- Institutional improvement processes

7.6. PURPOSES FOR THE PROCESSING OF PERSONAL DATA OF PERSONAL OUTSOURCING


- Knowledge of the resume and validation of the documents generated in the selection process carried out by the Holder's employer
- Verification of compliance with legal, technical and competency requirements and conducting psych technical tests to confirm the information Transferred by the Owner's employer, to the Responsible For The Treatment
- Consultation of administrative, judicial and / or disciplinary records
- Home visits
- Execution of the contracts signed between the Responsible For The Treatment and the Owner's employer
- Interview of the Area Manager
- Assignment and coordination of activities
- Deployment of the SG-SST and compliance with current standards that regulate the matter

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- Verification of the proof of payment of contributions to the social security and parafiscal system sent by the Employer of the Holder and proof of courses and training carried out to them, required for the development of the assigned activities
- Invitation to outsourcing personnel and their families or beneficiaries to trainings, events, drills, among others.
- Assignment of transport routes in accordance with the residence address
- Climate activities, organizational culture and well-being of outsourcing staff, beneficiaries and their families
- Reports and Transfer of general information and / or Personal Data to the Owner's employer, for the development of the contracts signed between them.
- Creation and administration of users and passwords to enter the different applications, technological and computer equipment, email accounts and web pages that require it.
- Creation and control of access and modification of documents.

7.7. PURPOSES FOR THE PROCESSING OF PERSONAL DATA OF ACTIVE AND INACTIVE CONTRACTORS AND SUPPLIERS AND THEIR COLLABORATORS

- Request, collection and analysis of quotes and / or offers.
- Invitations to participate in hiring processes.
- Development of contracting processes.
- Request for references and third party certificates.
- Verification of compliance with legal, technical and experience requirements.
- Compliance with Circular 170 of 2002 issued by the National Tax and Customs Directorate (DIAN) and or that which complements, modifies or repeals it.
- Compliance with the Compliance Policy.
- Consultation of administrative, judicial and / or disciplinary records in national and international restrictive lists and Operators of Commercial, Financial and Credit Information.
- Verification of references.
- Subscription and execution of contracts and / or issuance of purchase and / or service orders.
- Contract administration.
- Compliance with legal and contractual obligations.
- Payment management.
- Generation of tax information.
- Evaluation of Contractors and Suppliers, establishment of improvement plans and monitoring of commitments.
- Preservation of the commercial relationship history for future contracting processes.


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- Contact with Suppliers, Contractors or their collaborators, for the development of the contracts signed or service and / or purchase orders issued.
- Verification of the payment of salaries and social benefits of Contractors and Suppliers and their collaborators.
- Verification of compliance with the rules governing the Protection of Personal Data, and / or those that complement, modify, substitute or repeal them.
- Programming of technical activities and confirmation of execution of activities.
- Management of national and international transport, customs and storage (when applicable).
- Verification and monitoring of inventories (when applicable).
- Management of product quality claims, guarantees and / or replacements.
- Hotel reservations, air or land tickets, delivery of gas vouchers and tolls, per diem and request for vehicles, among others, in case of transfer by contractors and suppliers and / or their collaborators, when this obligation is stipulated in the contracts in charge of the Responsible For The Treatment.
- Verification of ownership of vehicles and their condition
- Execution of the contracts signed between the Responsible For The Treatment and the Owner's employer
- Deployment of the SG-SST and compliance with current standards that regulate the matter
- Verification of constancy of courses and training carried out to them, required for the development of the assigned activities
- Tracking of merchandise loads
- Pollution prevention
- Tracking routes and deliveries
- Transfer of general information and / or Personal Data of the Holder to his employer, for the development of the contracts signed between them.

8. RIGHTS OF THE OWNER

The following are the rights of the Owners of Personal Data:

- Know, update and rectify your personal data in front of the Treatment Managers or Treatment Managers. This right may be exercised, among others, against partial, inaccurate, incomplete, fractioned, misleading data, or those whose Treatment is expressly prohibited or has not been authorized.
- Request proof of the authorization granted to the Treatment Manager, except when expressly excepted as a requirement for the Treatment, in accordance with the provisions of article 10 of Law 1581 of 2012.

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- Be informed by the Treatment Manager or the Treatment Manager, upon request, regarding the use that has been given to your personal data.
- Present before the Superintendency of Industry and Commerce complaints for infractions to the provisions of Law 1581 of 2012 and the other regulations that modify, add or complement it.
- Revoke the authorization and / or request the deletion of the data when in the Treatment the principles, rights and constitutional and legal guarantees are not respected. The revocation and / or deletion will proceed when the Superintendency of Industry and Commerce has determined that in the Treatment the Responsible or Person in Charge has incurred in conduct contrary to Law 1581 of 2012 and the constitution.
- Free access to personal data that have been subject to Treatment.

The request to delete the information and revocation of the authorization will not proceed when the Holder has a legal or contractual duty to remain in the database.

9. DUTIES OF THE RESPONSIBLE FOR THE TREATMENT

It is the duty of the Responsible For The Treatment:

- Guarantee the Holder, at all times, the full and effective exercise of the Habeas Data Right
- Request and keep by any means and under the conditions provided in Law 1581 of 2012, a copy of the respective authorization granted by the Owner.
- Properly inform the Holder about the purpose of the collection and the rights that assist him by virtue of the authorization granted
- Keep the information under the security conditions necessary to prevent its adulteration, loss, consultation, use or unauthorized or fraudulent access.
- Guarantee that the information provided to the Person in Charge of Treatment is true, complete, accurate, updated, verifiable and understandable.
- Update the information, communicating in a timely manner to the Person in Charge of Treatment, all the news regarding the data that you have previously provided and adopt the other necessary measures so that the information provided to it is kept updated
- Rectify the information when it is incorrect and communicate the pertinent to the Treatment Manager
- Provide the Treatment Manager, as the case may be, only data whose Treatment is previously authorized in accordance with the provisions of Law 1581 of 2012


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- Require the Treatment Manager, at all times, to respect the security and privacy conditions of the Owner's information.
- Process inquiries and claims formulated in the terms indicated in Law 1581 of 2012
- Adopt an internal manual of policies and procedures to guarantee adequate compliance with Law 1581 and especially, for the attention of inquiries and complaints
- Inform the Treatment Manager when certain information is under discussion by the Owner, once the claim has been submitted and the respective process has not been completed.
- Inform at the request of the Holder about the use given to their data
- Inform the data protection authority when there are violations of the security codes and there are risks in the administration of the information of the Holders
- Comply with the instructions and requirements issued by the Superintendency of Industry and Commerce

10. DUTIES OF THE MANAGER OF THE TREATMENT AND/OR THE RESPONSIBLE FOR THE TREATMENT WHEN ACTING AS THE MANAGER OF THE TREATMENT OF THIRD PARTIES

It is the duty of the Responsible For The Treatment:

- Comply in the development of the contracted activities, with this Policy, as well as with all those procedures, guides and / or guidelines issued by the Person Responsible for the Treatment in terms of Protection of Personal Data.
- Adopt, according to the instructions of the Responsible For The Treatment, all technical, human and administrative measures that are necessary to provide security to the records avoiding their adulteration, loss, consultation, use or unauthorized or fraudulent access.
- Implement a Personal Data Protection Policy that complies with the provisions of the rules that regulate the matter.
- Treat Personal Data in accordance with the instructions expressly received from the Responsible For The Treatment, refraining from using them for purposes other than those contracted.
- Refrain from supplying, assigning or marketing Personal Data with third parties, natural or legal, public or private, unless it is of a public nature without subject to reservation, or is required by a competent authority in the exercise of its legal functions.
- Keep strict confidentiality regarding the personal data to which they have access in the exercise of the contracted activities, as well as to diligently

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comply with the duty of guardianship and custody over them throughout the term of the contract and even after the termination has occurred. .

- Access or consult the information or Personal Data that rest in the Databases of the RESPONSIBLE FOR THE TREATMENT only when it is strictly necessary for the exercise of the contracted activities.
- Report to the Responsible for the Treatment immediately upon its materialization or at the moment in which they come to their knowledge, through the channels and means established by it, any incident or threat of incident that affects or may affect directly or indirectly the protection of personal information.
- Guarantee at all times, the full and effective exercise of the Right to Habeas Data of the Holders, as well as due process in the event of PQR's being presented in the field of Personal Data Protection.
- Timely update, rectify or delete the data in the terms of Law 1581 of 2012.
- Update the information reported by the Responsible for Treatment, within five (5) business days from its receipt.
- Adopt an internal manual of policies and procedures to guarantee adequate compliance with Law 1581 of 2012 and, especially, for the attention of inquiries and claims by the Holders.
- Refrain from circulating information that is being controversial by the Holder and whose blocking has been ordered by the Superintendency of Industry and Commerce.
- Allow access to information only to people who can have access to it.
- Comply with the instructions and requirements issued by the Superintendency of Industry and Commerce.
- In case of collecting data on behalf of the Treatment Manager, require the authorization of the Holders, in the cases in which it is required, in accordance with the provisions of Law 1581 of 2012, and other regulations that complement, substitute, modify it or repeal.

11. AREA IN CHARGE OF THE PQR'S ATTENTION

The area responsible for the attention of requests, queries and claims before which the Holder of the information can exercise their rights to know, update, rectify and delete the data and revoke the authorization, will be the IT Area, who will exercise, among others , the functions of the Personal Data Protection Officer.

12. PROCEDURE SO THAT THE HOLDERS OF THE INFORMATION CAN EXERCISE THE RIGHTS

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The Holders or those persons who are legitimized by current regulations, can present Petitions, Queries and Claims through the following channels, established by the Person in charge of the Treatment for the attention of PQR's:

Email	datospersonales@proenfar.com
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The following are the persons empowered to present PQR's, in accordance with the provisions of article 2.2.2.25.4.1. of Decree 1074 of 2015:

- The Holder, who must sufficiently prove his identity.
- The successors in title of the Holder, who must prove such quality.
- The representative and / or attorney-in-fact of the Holder, prior accreditation of the representation or power of attorney.
- By stipulation in favor of another or for another, provided that there is acceptance by the Holder, of which evidence must be submitted in the application.

The rights of Boys, Girls or Adolescents shall be exercised by the persons who are empowered to represent them.


Queries and complaints will be resolved within the terms established in Laws 1266 of 2008 and 1581 of 2012, or those that replace, modify or repeal them.

12.1. INQUIRIES

The Treatment Manager or the Treatment Manager will respond to the query within a maximum term of ten (10) business days from the date of receipt. If it is not possible to respond within this period, the interested party will be informed of the reasons for the delay and the response date will be indicated, which cannot exceed five (5) business days following the first expiration.

12.2. CLAIMS

The Treatment Manager or the Treatment Manager, will respond to the claim within fifteen (15) business days from the day following receipt. If it is not possible to respond within this period of time, the Company will inform the interested party of the reasons for the delay and will indicate the response date, within eight (8) business days following the first expiration.

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13. LINKS

The PROENFAR S.A.S. website may include links to other sites. Please note that we are not responsible for the content or privacy practices of such sites. We encourage our users to be vigilant when they leave our site and to read the privacy policies of other sites that collect personal data. This Policy applies to the personal data collected by PROENFAR S.A.S.

14. COOKIES

Our website uses cookies. However, they do not collect or store any type of Personal Data.

15. SECURITY

PROENFAR S.A.S., maintains relevant technical and organizational measures to protect Personal Data against theft or any kind of illicit processing.

16. VALIDITY


Version 01 of the Policy was in force as of July 27, 2013.

This version 02 of the Policy is effective as of January, 14th, 2020.

This version 03 of the Policy is effective as of March 10, 2022.

The Databases subject to Treatment by the Responsible for the Treatment, will be in force while the purposes for which the data were collected and / or the term established by law subsist.

PROENFAR S.A.S. continually strives to implement new technologies and processes to better protect your Content, your privacy, and your use of the Site. Consequently, PROENFAR S.A.S., can make changes to this Policy and therefore reserves the right to modify this data treatment policy at any time. Under no circumstances will these changes result in the lowering of any of these security measures designed to protect your Content. Said modifications will be announced on the PROENFAR S.A.S. website. The most up-to-date version can be found on our website.

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The Responsible For The Treatment will communicate these changes to the Holder before or at the latest at the time of implementing the new policies and will require a new authorization when the change refers to the purpose of the Treatment.