

INFORMATION TREATMENT POLICY CH MAC ABOGADOS ASOCIADOS S.A.S.

RESPONSIBLE PERSON

CH MAC ABOGADOS ASOCIADOS S.A.S. (“CH MAC Abogados”), a Colombian company duly established, with tax identification number 901.137.873-0 and headquartered in the city of Bogota DC, with this document describes the information treatment policy (the "Policy") that regulates the collection, storage, treatment, and protection of personal information received from the personal data owners, by CH MAC Abogados through its various enabled divisions and channels, according to the current Colombian norms related to personal data protection, Law 1581 of 2012 and Decree 1377 of 2013.

The CH MAC Abogados contact information is the following:

- Physical address: Calle 93 # 12 – 14 Of. 404.
Edificio Tempo 93 Bogotá D.C. Colombia.
- Telephone: (+57) 311 379 0325
- webpage: www.chmacabogados.com
- email address: contacto@chmacabogados.com

LEGAL FRAMEWORK

- Colombian Political Constitution, Article 15.
- Law 1266 of 2008.
- Law 1581 of 2012.
- Decree 1377 of 2013.

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1. OBJECTIVE

With this Policy, CH MAC Abogados intends to establish the rules applicable to the handling/treatment of personal data by this company in development of its corporate object, according to Regulatory Law 1581 of 2012, regulated by Decree 13770 2013, Decree 1074 of 2015, and their constitutional bases.

According to the above, this Policy seeks to protect the privacy right, the habeas data, the intimacy, the good name, and the right to know, update, and rectify the information obtained from the personal data owners found in the CH MAC Abogados databases, consequently this document setting forth the parameters and procedures according to which CH MAC Abogados handles such personal data and determines the purposes, the rights of the personal data owners, and the exercise of such rights before CH MAC Abogados.

This Policy applies to all personal data included in any of the CH MAC Abogados databases and being subject to be handled by CH MAC Abogados.

2. DEFINITIONS

The following definitions are provided based on the current legislation, which will apply and will be implemented according to interpretation criteria guaranteeing their systematic and integral application, in addition to other principles and postulates governing the fundamental rights related to the habeas data and the personal data protection rights.

- a) *Authorization*: Prior explicit and informed approval by the owner pertaining to the treatment given to their personal data.
- b) *Database*: An organized set of personal data that will be handled.
- c) *Personal data*: Any information related or that can be associated to one or several specific or determinable natural persons.
- d) *Sensitive data*: Data subject to affecting the intimacy of the data owner or whose improper use could result in their discrimination, such as that disclosing racial or ethical origins, political orientations, religious or philosophical beliefs, participation in labor unions or in social, or human rights organizations or encouraging the interests of any political party or guaranteeing the rights and guarantees of opposing political parties, as well as data related to health, sexual activities, and biometrics, among others; the capture of fixed or moving images, fingerprints, photographs, irises, voice, facial, or handprint recognition, etc.

- e) *Person in charge of the data handling*: A natural or legal, public or private person that, on their own or in association with others, handles personal data on behalf of the person responsible for the data treatment.
- f) *Person responsible for handling the data*: A natural or legal, public or private person that, on their own or in association with others, makes decisions related to the database and/or the data treatment.
- g) *Owner*: A natural person whose personal data is handled/treated.
- h) *Treatment/handling*: Any operation or number of operations done on personal data, such as collection, storage, use, circulation, or deletion of such data.
- i) *Responsible area*: A person or group of persons responsible for the custody and being responsible for the personal database.

3. PRINCIPLES

CH MAC Abogados will apply the following specific principles, which will be the rules to be followed upon collecting, handling, using, treating, storing, and exchanging personal data:

- a) *Legality principle*: The current and applicable norms will be applied to the use, collection, capture, and treatment of the personal data, as applicable to the treatment of personal data and to other related fundamental rights.
- b) *Freedom principle*: The personal data will only be used, captured, collected, and treated subject to prior, explicit, and informed approval from its owner. The personal data will not be obtained or disclosed without prior authorization.
- c) *Finality principle*: The use, capture, collection, and treatment of the available personal data being collected by CH MAC Abogados will be subordinated and will respond to a legitimate purpose, which should be informed to the respective personal data owner.
- d) *Veracity or quality principle*: The personal data subject to being used, captured, collected, and treated should be true, complete, accurate, updated, verifiable, and comprehensible. Handling of partial, incomplete, or fractioned data, or of data leading to errors, is prohibited.
- e) *Transparency principle*: Upon using, capturing, collecting, and handling personal data, the data owner's right to obtain from CH MAC Abogados - at any time and with no restrictions - information related to the existence of any type of personal information or data being of interest or its property should be guaranteed.

- f) *Access and restricted distribution principle*: Except for public information, the personal data will not be made available in the Internet or in other mass communications or disclosure media, unless such access can be technically controlled to provide restricted information only to the owners or to authorized third parties. For this purpose, the CH MAC Abogados obligation will be one of means.
- g) *Security principle*: The personal data and the information used, captured, collected, and handled by CH MAC Abogados will be protected inasmuch as allowed by the minimum technical resources and standards.
- h) *Confidentiality principle*: All those managing, handling, updating, or having access to information of any type included in the databases undertake to protect and keep it strictly confidential and not disclose to third parties any personal, commercial, accounting, or technical information, or any other type of information obtained upon performing their duties. All those currently working or in the future hired for this purpose will sign an additional document, or amendment, to their employment or service contracts containing such commitment. This obligation will remain and will continue even after any of the tasks involving the data handling is finished.
- i) *Temporality principle*: Once the purpose for which the information was collected has been met, CH MAC Abogados will terminate such use, except for information that has to be kept according to a legal order.

4. DATA TREATMENT AND PURPOSE

4.1. Authorization

In order to collect, store, use, distribute, or delete personal data, CH MAC Abogados will require the free, prior, explicit, and inform authorization of the data owner.

Such authorization may be included in a physical or electronic document, or in any other form allowing the data owners to make subsequent data checks. For this, CH MAC Abogados will use the mechanisms it currently has available and will take the necessary steps to keep proper records showing when and how such authorization was obtained from the personal data owners.

CH MAC Abogados does not sell or lease to third parties the databases it obtains upon developing its corporate object. Such information will only be handled for the purposes and during the times specifically indicated, CH MAC Abogados committing to keep it secure and under high levels of privacy and confidentiality. All the information obtained by CH MAC Abogados is protected in various types of archives

and virtual copies and is stored in internal servers that are managed by the administrative area.

4.2. Treatment

The access to the information collected by any other means implemented for this purpose is available to certain personnel only and is protected by user names and administrator passwords. CH MAC Abogados obtains the information it keeps in its databases through contractual relationships typical of its corporate object, protected by high security measures and restricted access.

CH MAC Abogados will perform activities involving data collection, storage, use, distribution (in properly authorized cases), and/or deletion. Such data treatment will be exclusively done for the authorized purposes indicated in this Policy. The personal data will be handled only should there be a legal or contractual obligation to do so.

4.3. Finality

The information handled by CH MAC Abogados corresponds to information provided by its suppliers, employees, and clients. The information now being obtained will be handled with the following purposes:

- Perform the commercial and contractual activities related to CH MAC Abogados and its suppliers.
- Deliver correspondence to the clients and information involving new and current issues that could benefit the clients.
- Issue invoices, quotations, records, and all the documents required to support the CH MAC Abogados accounting records.
- Develop accounting processes and procedures.
- Comply with the information security protocols contained in the CH MAC Abogados databases.
- Client information: Render the services requested by the clients and report on the state of the contracted services and their changes and new issues; update contact information and deliver the products requested by the clients.
- Supplier data: Issue purchase orders and pay its suppliers; report the tax information and perform the contracts executed between CH MAC Abogados and its suppliers.
- Employee data: Make labor, social security, and non-fiscal payments. Report the tax information and anything else generated by their contractual relationship with CH MAC Abogados. Keep the information in its databases

during the times indicated by the law and disclose the contact information as necessary in emergency cases, work accidents, and for academic training. Provide references to third parties related to their activities in CH MAC Abogados, as authorized by the information owner and according to the labor law, during the times therein indicated.

4.4. Sensitive Information

Should sensitive information or minor information have to be handled, in order to protect the interests of the data owners CH MAC Abogados will handle such information with special care and under strict security measures. CH MAC Abogados has implemented technological and operational security systems and standards in order to protect the information from its improper use, loss, changes, or destruction. Additionally, all our employees and suppliers are aware of the proper manner in which the personal data and the sensitive information should be handled, consequently undertaking to follow such information security policies.

5. DATA OWNERS' RIGHTS

In accordance with the current norms applicable to personal data protection, the personal data owner has the following rights:

- Access, know, rectify, and update their personal data before CH MAC Abogados, in their capacity of person responsible for handling the data.
- Through any valid means, request evidence of the authorization given to CH MAC Abogados in its capacity of person responsible for handling the data.
- Subject to prior request, receive information from CH MAC Abogados regarding the use given to their personal data.
- Appeal before the legally established authorities, especially the Superintendence of Industry and Commerce, and file claims in case of violations to the current applicable norms, subject to a prior request or requirement to the person responsible for handling the data.
- Amend or revoke the authorization and/or request, deleting the information should the constitutional and current principles, rights, and legal guarantees not be followed.
- Be informed of and at no charge have access to their personal data having been handled.
- File complains before the Superintendence of Industry and Commerce in case of violations to Law 1581 of 2012 and other norms amending, appending, or supplementing it.

6. CH MAC ABOGADOS DUTIES AS PERSON RESPONSIBLE FOR HANDLING PERSONAL INFORMATION

CH MAC Abogados will have the following obligations while acting as the person responsible for handling personal information:

- a) At all times guarantee to the data owner the full and effective exercise of the habeas data right.
- b) Request and keep a copy of the respective authorization given by the data owner.
- c) Properly reported to the data owner the reason for obtaining the data and the rights they have under the authorization given.
- d) Keep the information with the security measures required to prevent its adulteration, loss, perusal, or unauthorized or fraudulent access.
- e) Make sure that the information delivered to the person in charge of handling it is true, complete, exact, updated, verifiable, and comprehensible.
- f) Update the information, reporting to the person in charge of its handling all new circumstances involving data that has been previously provided, taking the necessary steps to ensure that such information will be kept updated.
- g) Rectify the information should it be incorrect and notify the person responsible for its handling.
- h) As applicable, deliver to the person in charge of handling the information only such information whose handling has been previously authorized.
- i) At all times, require the person in charge of handling the information to follow the information owner's privacy and security conditions.
- j) Process the questions and claims received.
- k) Inform the person in charge of the data handling should certain information be under discussion by the information owner, once the claim has been filed and the respective process not have been yet concluded.
- l) Report to the information owner the use given to their information.
- m) Report to the data protection authorities any violation of the security codes and any risk found in the data owners' information management.

7. CH MAC ABOGADOS OBLIGATIONS AS THE PERSON IN CHARGE OF THE PERSONAL DATA HANDLING

- At all times, guarantee to the data owner the full and effective exercise of the habeas data right.
- Keep the information under the security conditions required to prevent its adulteration, loss, use, and unauthorized or fraudulent access.
- Timely update, rectify, or delete the data according to Law 1581 of 2012.
- Update the information reported by those responsible for handling the data within the five business days following its receipt.
- Process the questions and claims filed by the data owners according to Law 1581 of 2012.
- Include in the database the legend "*claim being processed*", as indicated by Law 1581 of 2012.
- Include in the database the legend "*information under legal discussions*", after being notified by the competent authority of judicial processes related to the quality of the personal data.
- Not distribute any information being contested by the data owner and which the Superintendence of Industry and Commerce has requested be blocked.
- Report to the Superintendence of Industry and Commerce violations of the security codes and should handling of the owners' information involve risks.
- Comply with the instructions and requirements issued by the Superintendence of Industry and Commerce or by any other authority with jurisdictional or administrative authority. For this, CH MAC Abogados will evaluate the petition regarding compliance with the legal requirements. Once verified, the information required by the authority will be delivered and the process carefully documented.

CH MAC Abogados will at all times be aware that the personal data is the property of the persons it refers to and that only they can make decisions involving such data. Consequently, it will use such data only for the properly authorized purposes, at all times following the current personal data protection norms.

Should the person in charge of the data handling and the person responsible for handling the data be the same person, CH MAC Abogados will be responsible for complying with the duties assigned to each of them.

8. RESPONSIBLE AREA

The owners or their successors will be able to perform any of the established procedures on the personal data contained in the CH MAC Abogados databases. CH MAC Abogados has established the following channels for any of the previously processes:

- Area in charge: Administrative.
- Led by: Alexandra Criales.
- Address: Calle 93 # 12 – 14 Of. 404.
- Email: contacto@chmacabogados.com
- Telephone: (+57) 311 379 0325

9. PROCEDURES

CH MAC Abogados will guarantee the access right subject to prior confirmation of the owner's identity and the legitimacy or legal capacity of their representative, making available - at no cost and in a detailed manner - the respective personal data by any means, including electronic, so that the data owner will be able to directly access such information.

Regardless of the relationship the personal data owners may have with CH MAC Abogados, they will be able to exercise their right to know, update, rectify, and delete the information and revoke the authorization given, according to the following:

9.1. Data Deletion

The data owner has at all times the right to request contacto@chmacabogados.com to delete their personal data, should:

- They believe that such data is not being handled according to the principles, duties, and obligations considered in the current norms.
- They consider that such data is no longer necessary or pertinent for the purposes it was obtained for.
- The time allowed to comply with the purposes the data was obtained for have expired.

Such deletions entail the full or partial deletion of the personal information according to the information owner's request from the records, archives, databases, or data handling elements used by CH MAC Abogados.

9.2. Revocation of the Authorization

The personal data owners may at any time revoke the authorization given pertaining to the handling of their personal data, provided not prohibited by a legal or

contractual norm. For this, CH MAC Abogados has simple and free mechanisms that allow the owner to revoke such authorization, at least in the same manner it was given.

9.3. Submittal of Requests

Requests should be submitted by:

- The owner of the information, providing a valid ID.
- The information owner's successors, which should demonstrate such capacity.
- The information owner's representatives or attorneys, accrediting the person's representation and/or power of attorney.
- Including the necessary documents, if delivered in favor of another person or for another person.

As a minimum, the request should include the owner's ID, a description of the circumstances leading to the claim, the concern, the update or deletion, the contact address and telephone numbers, the email, and any other applicable document.

9.4. Questions

In case of questions related to personal data, CH MAC Abogados will implement the necessary and pertinent means required for this process. Questions will be responded within the 10 business days following their receipt with the supporting documents confirming the legitimacy of the exercise of the data owner's rights.

9.5. Claims

Should the owners of the personal data handled by CH MAC Abogados consider that their data should be corrected, updated, or deleted, or should they believe that the obligations contained in the TCS law have been defaulted, they will be able to express their concerns by sending an email to contacto@chmacabogados.com

The procedure will be as follows:

- Before replying to the concern, CH MAC Abogados will confirm the identity of the personal data owner, of the representative, and/or of the attorney, or the confirmation that there was a condition by another or for another. For this, it may require the original owner's ID, the special or general powers of attorney, or any other document that may be required.
- Should the claim or the additional documentation be incomplete, only once and within the five days after having received the claim CH MAC Abogados will ask the claimant to correct the problems. Should the claimant not submit

the required documentation/information within the two months following the initial claim, it will be considered that they have desisted from the claim.

- Should for any reason the person receiving the claim in CH MAC Abogados not be able to resolve it, it will be transferred to the responsible area within the two business days after having been received, this circumstance being reported to the claimant.
- Once the claim and the complete documentation have been received, within the following two business days the legend "*claim in progress*" and the reason for the claim will be entered to the CH MAC Abogados database that includes the owner's data object of the claim. Such legend will be maintained until the claim has been resolved.
- The claim will be resolved within a maximum of 15 business days after its receipt. Should this not be possible, the claimant will be informed of the reasons for the delay and the expected date it will be responded, which in no case will exceed 8 business days after the end of the previous 15 days.

10. TEMPORALITY OF THE PERSONAL DATA

The time during which CH MAC Abogados will keep the personal data will depend on the purpose for which it was obtained, as considered on a case-by-case basis. Once such purpose has been met, CH MAC Abogados will delete or return the data and will confirm such circumstance to the personal data owner.

In any case, CH MAC Abogados understands that there are legal obligations that require it to keep certain information during a specific time. Consequently, CH MAC Abogados undertakes to keep it only for such purpose and to take the necessary security measures.

11. POLICY AND DATABASE TERM

This Policy will be in effect as of January 31 of 2018. Should it be subject to material changes/amendments, the owners will be informed immediately through the means/channels enabled for this purpose.

The CH MAC Abogados database term will correspond to the purpose it was created for, 10 years otherwise.

ANNEX

TREATMENT OF SENSITIVE DATA DURING THE SANITARY EMERGENCY

As defined in this Policy, sensitive data means:

"Data subject to affecting the intimacy of the data owner or whose improper use could result in their discrimination, such as that disclosing racial or ethical origins, political orientations, religious or philosophical beliefs, participation in labor unions or in social, or human rights organizations or encouraging the interests of any political party or guaranteeing the rights and guarantees of opposing political parties, as well as data related to health, sexual activities, and biometrics, among others; the capture of fixed or moving images, fingerprints, photographs, irises, voice, facial, or handprint recognition, etc."

During the sanitary emergency, the sensitive data handling will be governed by the principles and other conditions contained in this Policy, additionally the special conditions contained in this Annex applying according to the CH MAC Abogados data handling requirements.

HANDLING CONDITIONS

According to Decree 10374 of 2013 and Law 1581 of 2012, handling sensitive information is prohibited, except in the following cases:

- a) The data owner has given explicit authorization for such handling, except in cases in which, according to the law, such authorization is not required.
- b) Such handling is required to protect the owner's vital interests or should the owner be physically or legally incapacitated. In these cases, the legal representatives will give such authorization.
- c) The data is handled - during the course of the legitimate activities and with the proper guarantees - by a foundation, NGO, association, or any other nonprofit organization whose purposes are political, philosophical, religious, or labor union related, provided exclusively referring to their members or to persons having regular contacts by reason of their purpose. In these cases, the data will not be provided to third parties without the owner's authorization.
- d) The data handling relates to information that is required for the acceptance, exercise, or defense of a right within a legal process.

- e) The data is handled for historical, statistical, or scientific purpose. In these cases, the necessary steps should be taken to hide the owners' identity.

Additionally, CH MAC Abogados meets the legal obligations upon requesting the authorization to handle sensitive data, as contained in article 2.2.2.25.2.3 of Decree 1074 of 2015, namely:

1. Informing the owner that, upon being sensitive information, they will not be required to authorize its handling.
2. Explicitly and in advance inform the owner that, in addition to the general requirements of the authorization required to collect any type of personal information, they should report which of the information that will be handled is sensitive, as well as the purpose of such handling, which will be required to obtain the explicit approval.

No activity will be conditioned to the owner providing sensitive personal data.

In compliance with the CH MAC Abogados Biosafety Protocol during a sanitary emergency declared by the national government, the responsible person will again collect semi-sensitive and sensitive data, as considered in article 6 of Law 1581 of 2012. Consequently, in order to protect the owners' vital interests, with special care and strict protection measures CH MAC Abogados will protect such data. CH MAC Abogados has implemented technology systems, standards, and operational security measures to protect the personal information against loss, improper use, changes, or destruction. Our employees are aware of the proper treatment that should be given to all personal data and to data considered sensitive, who consequently undertake to follow the information security policies.

PURPOSE

The purpose of the sensitive data treatment policy during the sanitary emergency will meet all obligations and recommendations made by the authorities in order to avoid and control the propagation of the event that resulted in the declaration of such emergency. The data treatment policy will be temporary and will be limited according to the need the responsible person has to handle such information, either until the day the sanitary emergency ends or until the authorities consider that it is necessary to continue handling the information.

DATA OWNERS

During the time the authorities consider that it is required or advisable to apply the Biosafety Protocol, CH MAC Abogados will collect the sensitive information from the following population groups:

WORKERS

All workers will be required to deliver the information to CH MAC Abogados, in its capacity of employer, provided applying the Biosafety Protocol is considered strictly necessary, information that could include data related to the health of each of their relatives. All the information related to the workers' relatives will be requested anonymously, respecting the necessity and minimization principle of the information received by CH MAC Abogados.

Without limitation, such information could include the worker's body temperature upon entering or leaving the CH MAC Abogados facilities and some pre-existing medical conditions that could pose a major risk, such as hypertension, hypothyroidism, diabetes, obesity, cardiovascular illnesses, and others, according to which the Biosafety Protocol might be applied differently.

THIRD PARTIES REQUIRING ENTERING THE CH MAC ABOGADOS FACILITIES

CH MAC Abogados will manage the information of all persons entering its facilities, for public health reasons and to protect the health of the workers and of those entering its offices. CH MAC Abogados will treat as sensitive information all records it keeps regarding the third parties' health, as contact information requesting preferably public information such as the names, the ID numbers, and the work contacts. Should such public data not be available, CH MAC Abogados will handle the personal and sensitive data according to its nature and the conditions contained in this Policy.