

	DATA PROTECTION POLICY	PT-PE-007
		Version 1
		Date: 11/11/2022

POLICIES AND PROCEDURES MANUAL FOR THE PROTECTION AND SECURITY OF PERSONAL DATA INFORMATION IN ROCSA COLOMBIA S.A. AND ITS SUBSIDIARIES

CONTENTS

CONTEXT 2

GENERAL INFORMATION..... 2

DEFINITIONS..... 2

PRINCIPLES 4

AUTHORIZATION OF THE HOLDERS..... 5

RIGHTS OF THE HOLDERS..... 6

CONSULTATION PROCEDURE7

PROCEDURE FOR REQUIREMENTS 8

PROCEDURAL REQUIREMENT 8

DUTIES OF THE CONTROLLER AND DATA PROCESSOR 9

SECURITY MEASURES.....10

DATA TRANSFER TO THIRD COUNTRIES.....11

PURPOSE OF THE TREATMENT.....11

CHANGES OR MODIFICATIONS TO THE MANUAL13

EFFECTIVE DATE13

	DATA PROTECTION POLICY	PT-PE-007
		Version 1
		Date: 11/11/2022

POLICIES AND PROCEDURES MANUAL FOR THE PROTECTION AND SECURITY OF PERSONAL DATA INFORMATION IN ROCSA COLOMBIA S.A. AND IT'S SUBSIDIARIES

CONTEXT

ROCSA COLOMBIA S.A. and its subsidiaries with principal domicile in Colombia, department of Cundinamarca and municipality of Tenjo identified by NIT. 830.027.231-3 capacity as responsible for personal data processing undisclosed and privacy, by means of a Manual of Policies and Procedures for the Protection of Personal Data Information (hereinafter "Manual"), complies with the provisions established by Law 1581 of 2012 and Decree 1377 of 2013 and Decree 1377 of 2013 and other applicable regulations.

GENERAL INFORMATION

Law 1581 of 2012: The principles and provisions of the law will be applicable to personal data registered in any database that makes them subject to treatment by entities of a public or private nature, and those of decree 1377 of 2013.

Law 1581 of 2012, aims to “develop the constitutional right that all the people have to know, update and rectify the information that has been collected about them in databases or files, and all other rights, liberties and constitutional guarantees referred to in Article 15 of the Political Constitution; as well as the right to information enshrined in article 20 thereof”.

DEFINITIONS

ROCSA COLOMBIA S.A.S and filialness take into account the following definitions in the Personal Data Processing Policy Manual:

- **Treatment:** Any operation or set of operations on personal data, such as collection, storage, use, circulation or deletion.
- **Party in charge of the Treatment:** Natural or legal, public or private person, who by himself/herself or in association with others, performs the processing of personal data on behalf of the party responsible for the Treatment

- **Party responsible for the Treatment:** Natural or legal, public or private person, who by himself/herself or in association with others, decides on the database and/or the Processing of the data.
- **Public data:** Data that is not semi-private, private or sensitive. Public data include, among others, data pertaining to the marital status of people, their profession or craft, and their capacity of trader or public servant. Given their nature, public data may be contained, among others, in public records, public documents, gazettes and official bulletins, and judicial rulings duly executed, not subjected to confidentiality.
- **Sensitive data:** Sensitive data includes the data that affect the intimacy of the Owner or which undue use may give rise to their discrimination, such as those that disclose their race or ethnic background, political preference, religious or philosophical convictions, affiliation to unions, social, human rights organizations, or entities that guarantee the rights and guarantees of opposition political parties, as well as the data pertaining to health, sexual life and biometric data.
- **Personal data:** Any information linked to or associated with one or more specific or determinable natural persons.
- **Authorization:** Prior, express and informed consent of the Holder to duly process personal data.
- **Database:** Organized set of personal data, subjected to processing.
- **Holder:** Natural person whose personal data are subjected to processing.
- **Privacy Notice:** Written communication generate by ROCSSA COLOMBIA S.A. and Its subsidiaries, by means of the document called Habeas Data Certification generated by the responsible party, addressed to the Data Subject for the processing of their personal data, through which they are informed about the existence of the information processing policies that will be applicable to them, the way to access them and the purposes of the processing that will be given to the personal data.
- **Transfer:** It takes place when the data controller and/or the person in charge of the processing of personal data, sends information of these to a receiver: associated, affiliated or contracted companies for the administration of processes that automate commercial and/or administrative operations, according to the data policy of the company, which in turn is responsible for the processing
- **Transmission:** Processing of personal data that implies the communication thereof in or out of the territory of the Republic of Colombia, when the purpose is to conduct a Processing by the Party in charge on behalf of the Responsible party.

	DATA PROTECTION POLICY	PT-PE-007
		Version 1
		Date: 11/11/2022

PRINCIPLES

ROCSA COLOMBIA S.A. and Its subsidiaries apply the following principles in the processing of personal data:

- **Principle of legality:** The processing of personal data shall be subject to the provisions of the relevant legal provisions.
- **Principle of purpose:** The processing of personal data to which you have access and are collected, stored, purged, analysed and updated by ROCSA COLOMBIA S.A. and its subsidiaries, will have as purpose the development of commercial and administrative operations.
- **Principle of freedom:** The processing of personal data will be carried out with the prior, express and informed consent of the Data Subject. Personal data may not be obtained or disclosed without prior authorization, or in the absence of legal, statutory, or judicial mandate that relieves consent.
- **Principle of truthfulness or quality:** The information subject to processing shall be truthful, complete, accurate, updated, verifiable and understandable. The processing of partial, incomplete, fractioned or misleading data is prohibited.
- **Principle of transparency:** The processing of personal data shall guarantee the right of the Data Subject to obtain by official means and upon request by ROCSA COLOMBIA S.A. and its subsidiaries at any time and without restrictions, information about the data concerning.
- **Principle of restricted access and circulation:** Personal data (except for public information) may not be available on the Internet or other means of dissemination or mass communication, unless access is technically controllable by ROCSA COLOMBIA S.A. and its subsidiaries, then that applies to develop commercial and administrative processes.
- **Security Principle:** The information subject to data processing by ROCSA COLOMBIA S.A. and its subsidiaries, will be handled with the technical, human and administrative measures necessary. This ensures that the security of the

	DATA PROTECTION POLICY	PT-PE-007
		Version 1
		Date: 11/11/2022

records will be practiced such as, avoiding access, consultation, adulteration, and loss, allowing unauthorized or fraudulent use.

- **Principle of confidentiality:** All persons involved in the processing of personal data in which do not have the nature of public, are obliged to ensure the confidentiality of the information entrusted to them. Even after the end of their relationship with any of the tasks that include the processing of data may only make provision or communication of personal data when it corresponds to the development of authorized activities ROCSA COLOMBIA S.A. and its subsidiaries.

AUTHORIZATION OF THE HOLDERS

For the processing of personal data, the prior and informed authorization of the Data Subject is required. This must be obtained through the document called **Habeas Data Certification**, which may be subject to subsequent consultation.

The authorization of the holder will not be necessary when it comes to:

- Information is required by a public or administrative entity in the exercise of its legal functions or by court order.
- Those whose purpose is the national security and defense prevention, detection, monitoring and control of money laundering and the financing of terrorism.
- Data of a public nature
- Cases of medical or health emergency
- Processing of information authorized by law for historical, statistical or scientific purposes.
- The databases with financial, credit, commercial and service information, and the population and housing censuses.

The requested information may be provided by physical means or via e-mail in PDF format while complying with the attributes of legality, legitimacy, originality, and legibility. The information must be easy to read and without technical barriers that prevent its access.

The authorization of the Data Subject is a statement of acknowledgement of the person or entity that collects the information in which the type and content of the information collected. The purpose of this collected information is display how you can exercise your rights. The power of decision of the Data Subject on their personal data implies the recognition that their Information is subject to processing, according to the legal provisions and the provisions of this Manual. ROCSA COLOMBIA S.A. and its subsidiaries adopt the measures it deems necessary to maintain and ensure the record of when and how the authorization is obtained from the holder of the personal data.

The Data Controller, at the time of requesting the authorization to the Data Subject, shall clearly and expressly inform them of the following:

- The processing to which your personal data will be submitted and assessed the purpose.
- The optional nature of the answer to the questions are asked when they deal with sensitive data.
- The rights you have as a holder.
- The identification: physical or electronic address and telephone number of the Data Controller.

RIGHTS OF THE HOLDERS

In accordance with the provisions law, the data holders may exercise a series of rights:

- Conform, update and rectify your personal data with respect to those responsible for data processing.
- Request proof of the authorization granted.
- Be informed upon request, regarding the use that will be made of your personal data.
- To file complaints before the Superintendence of Industry and Commerce for violations of the provisions of the rules on personal data.
- Request the deletion of personal data.
- To revoke the authorization by submitting a request and/or claim. This does not apply when the Data Subject has a legal or contractual duty to remain in the database.

	DATA PROTECTION POLICY	PT-PE-007
		Version 1
		Date: 11/11/2022

- Request the Superintendence of Industry and Commerce to order the revocation of the authorization and/or the deletion of the data.
- Consult your personal data, at least once every calendar month and every time there are substantial modifications to the information processing policies.

To exercise these rights, the holder may contact the following customer service line: 4325136, email credito@rocsa.com by written communication or by going directly to the main office Utopistic Medellin km 5.7 south side, warehouse 1 - Logika II. Tenjo Cundinamarca.

CONSULTATION PROCEDURE

The Data Subjects or their successors in title may consult the personal information of the Data Subject contained in any of our databases.

The credit and portfolio area of ROCSA COLOMBIA S.A. and its subsidiaries, will process the requests made by the Data Controllers or their assignees in relation to the processing of their personal data.

For this purpose, it is necessary that the Holder or his legal representative identify himself. It is also expected that they make a clear, precise and detailed description of the data in respect of which they base their request or seeks to exercise any of their rights, in order to ensure a timely and effective response.

In the case of inquiries and complaints, ROCSA COLOMBIA S.A. and its subsidiaries, will respond to the petitioners within the term established in Law 1581 of 2012, that is, within a maximum term of ten (10) business days from the date of receipt of the request.

When it is not possible to answer the consultation within said term. The interested party will be informed, stating the reasons for the delay and indicating the date on which the request will be resolved. This may not exceed five (5) working days following the expiration of the first term.

	DATA PROTECTION POLICY	PT-PE-007
		Version 1
		Date: 11/11/2022

PROCEDURE FOR REQUIREMENTS

The Data Subject or its assignees who consider that the information contained in our database should be corrected, updated or deleted, or when they notice the alleged breach of any of the duties contained in Law 1581 of 2012, may submit a request which will be processed under the following conditions:

- The requirement shall be formulated by means of a request addressed to the Credit and Portfolio area of ROCSA COLOMBIA S.A. and its subsidiaries, with the due identification of the Holder, the description of the facts that give rise to the request and the address, together with the documents to be asserted. If the request is incomplete, the interested party will be requested within five (5) business days after receipt in order to correct the faults. After two (2) months from the date of the request, without the Holder or its assignees submitting the requested information, it will be understood that the request has been withdrawn.
- In the event that the person who received the request is not competent to resolve it, it will be transferred to the corresponding person within a maximum term of two (2) business days and the interested party will be informed of the situation.
- Once the complete request 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. This legend shall be maintained until the request is resolved.
- The maximum term to comply with the request will be fifteen (15) working days from the day following the date of receipt. When it is not possible to comply with the request within such term, the interested party shall be informed of the reasons for the delay and the date on which the request will be complied with, which in no case may exceed eight (8) business days following the expiration of the first term.

PROCEDURAL REQUIREMENT

It is important that the holder or assignee takes into account that they may only file a complaint before the Superintendence of Industry and Commerce once they have

	DATA PROTECTION POLICY	PT-PE-007
		Version 1
		Date: 11/11/2022

exhausted the consultation process or requirement before ROCSA COLOMBIA S.A. and its subsidiaries.

DUTIES OF THE CONTROLLER AND DATA PROCESSOR

Data Controllers shall have the following duties without prejudice to the other provisions set forth in this Law 1581 of 2012 and others that govern their activity:

- Guarantee to the holder the full and effective exercise of the right of habeas data at all times.
- Adopt an internal policy and procedure manual in order to ensure proper compliance.
- Make available to the Data Subject free and easily accessible mechanisms to submit the request for modification or deletion of data or the revocation of the authorization.
- Respond to the requirements of the Superintendence of Industry and Commerce by means of a description of the procedures used for the collection, storage, use, circulation and suppression of the information. This description displays how the information is collected and provides an explanation to the need to collect the data.
- Designate the area in charge of assuming the personal data protection function.
- Request and keep, under the conditions set forth in the Law, a copy of the respective authorization granted by the Holder.
- Inform the Data Subject about the purpose of the collection and the rights they have by virtue of the authorization granted.
- Keep the information under the necessary security conditions 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, updated, verifiable and understandable.
- Update the information, communicating in a timely manner to the Data Processor. All developments regarding 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.

- To provide to the Data Processor necessary data whose processing is previously authorized in accordance with the provisions of the Law.
- To require the Data Processor at all times to respect the security and privacy conditions of the Data Subject's information.
- Process inquiries and claims formulated in accordance with the terms set forth in the Law.
- Adopt an internal manual of policies and procedures to ensure adequate compliance with the Law and to deal with enquiries and requirements.
- Inform the Data Processor when certain information is under discussion by the Data Subject. Once the claim has been filed, the respective process has not been completed.
- Inform at the request of the Data Subject about the use given to his or her data.
- Inform the Superintendence of Industry and Commerce, through the Delegation for the Protection of Personal Data, when there are violations to the security codes and there are risks in the administration of the information of the Data Holders.
- Comply with the instructions and requirements issued by the Superintendence of Industry and Commerce in matters of habeas data.

SECURITY MEASURES

Rocsa Colombia S.A. and its subsidiaries will adopt the human, administrative and technical measures required in order to grant the security levels to the information to avoid its adulteration, lost, consultation, use or unauthorized and/or fraudulent access.

The measures established will respond to the activation of controls and risk mitigation that respond to the minimum requirements established by current legislation.

Safety measures at ROCSA COLOMBIA are as follows:

- Induction and sensitization processes for employees on information security issues.
- Access controls to information systems by means of users and passwords.
- Physical and environmental security of our sites.
- Guidelines and change management in the organization.

	DATA PROTECTION POLICY	PT-PE-007
		Version 1
		Date: 11/11/2022

- Communications security.
- Business continuity plan.
- Guidelines for use of systems.

DATA TRANSFER TO THIRD COUNTRIES

The transfer of personal data of any kind to countries that do not provide adequate levels of data protection is prohibited. It is understood that a country offers an adequate level of data protection when it complies with the standards set by the Superintendence of Industry and Commerce on the matter, which in no case may be lower than those required by law to its recipients:

- Information with respect to which the Data Subject has given their express and unequivocal authorization for the transfer.
- Exchange of medical data, when so required by the Data Controller's data processing for health or public hygiene reasons.
- Bank or stock exchange transfers, in accordance with the applicable legislation.
- Transfers agreed within the framework of international treaties to which the Republic of Colombia is a party, based on the principle of reciprocity
- Transfers necessary for the execution of a contract between the Data Subject and ROCSA COLOMBIA S.A. and its subsidiaries, or for the execution of pre-contractual measures as long as the authorization of the Data Subject is obtained. Transfers legally required to safeguard the public interest, or for the recognition, exercise or defense of a right in a judicial proceeding.
- For cases not contemplated above, authorization shall be requested from the Superintendence of Industry and Commerce.

PURPOSE OF THE TREATMENT

ROCSA COLOMBIA S.A. and its subsidiaries is responsible for the processing of personal data. It has policies and procedures to ensure that the data processors comply with them.

These policies of treatment of information are available in physical or electronic media, in a clear and simple language that are in knowledge of the data subjects.

	DATA PROTECTION POLICY	PT-PE-007
		Version 1
		Date: 11/11/2022

Any substantial change in the processing policies will be previously and timely communicated to the Data Controllers in an efficient manner.

Therefore, ROCSA COLOMBIA S.A. and its subsidiaries will use the data for the following purposes:

- Perform through any means, directly or through third parties, activities of control and prevention for money laundering, financing of terrorism and financing for the proliferation of weapons of mass destruction, linking, sales, billing, collection management, collection, programming, technical support, market intelligence, service improvement, verifications and consultations, control, behaviour, habit and enablement of means of payment, fraud prevention, as well as any other related to our current and future products and services, for the fulfillment of contractual obligations and our corporate purpose.
- To provide assistance, service and technical support for our products and services.
- Take the necessary steps to comply with the obligations inherent to the services and products contracted with ROCSA COLOMBIA S.A. and its subsidiaries.
- Comply with the obligations contracted with our customers, suppliers, partners, affiliates, distributors, subcontractors, outsourcing and other public or private third parties (This would be directly or indirectly related to the corporate purpose of ROCSA COLOMBIA S.A. and its subsidiaries).
- Inform about changes in products and services related to the ordinary course of business of ROCSA COLOMBIA S.A. and its subsidiaries.
- Control and prevent fraud in all its forms.
- To facilitate the correct execution of purchases and provision of contracted services and products.

The type of processing of personal data contemplates the following:

- Comply with the regulatory provisions on data transfer to third countries in case such transfer is necessary.
- Provide information to the authorities that expressly request it and in the exercise of their functions or to respond to administrative or judicial requirements.

	DATA PROTECTION POLICY	PT-PE-007
		Version 1
		Date: 11/11/2022

CHANGES OR MODIFICATIONS TO THE MANUAL

ROCSA COLOMBIA S.A. and its subsidiaries, reserve the right to modify at any time and unilaterally this manual or any policy and procedure relating to the processing of personal data. In addition, to always observe the guidelines of the law in force or continuous improvement of the document, which event will be timely and properly communicated to interested parties prior to its application.

EFFECTIVE DATE

This Policy and Procedure Manual on the Processing of Personal Data is effective as of July 04, 2017 and is valid for an indefinite period of time.