

POSSE HERRERA RUIZ ATTORNEYS' "PHR" Personal Data Processing Policy

According to the provisions of Article 9 of the Statutory Law 1581 of 2012 and Articles 5, 6 and 7 of Decree 1377 of 2013, we inform you that personal data collected by POSSE HERRERA RUIZ ATTORNEYS, hereinafter "PHR", will be subject to collection, storage, use and circulation in the terms set out in this document.

1. Identification of the person responsible for the Information Processing:

POSSE HERRERA RUIZ ABOGADOS "PHR", Carrera 7 No. 71-52, Tower A, Floor 5, Bogotá D.C., Colombia, web page www.phrlegal.com, e-mail protecciondedatos@phrlegal.com and telephone number (571) 3257300, ext 482.

2. Purposes and Treatment for the Personal Data:

The personal data you provided to "PHR" will be stored in PHR's databases and will be used for any of the following purposes:

• Customers:

The data processing is carried out with the purpose of providing the contracted services, consistent in legal advice and representation in legal matters of various kinds by PHR, as well as informing on novelties and regulatory news which PHR carries out to keep its clients updated and informed in matters of interest.

• Before Employees:

The data processing will be carried out for purposes related to their link, execution and termination of the employment relationship arising between the employee and PHR.

• Before Suppliers:

The data processing will be carried out in order to contact and execute contracts with product or service suppliers that PHR may require for the normal functioning of its operations and the adequate provision of facilities or offices.

• Before job candidates:

The processing of personal data is held in order to overtake staff recruiting processes and hiring employees to be linked to the firm.

Accordingly, for the purposes described above, PHR may: **A.** Learn, store and process all the information provided by the holders of one or more databases in the format it deems appropriate. **B.** Sort, categorize, classify, divide or separate the information provided by the holders. **C.** Check, double check, test, validate, investigate or compare the information provided by the holders with any information legitimately available. **D.** Access, consult, compare and evaluate all information on holders stored in the databases of any central credit, financial risk, criminal records or legally constituted security, of the state or private, national or foreign. **E.** Analyze, process, evaluate, treat, or compare the information provided by the owners. **F.** Study, analyze, customize and use the information provided by the holders for both individual and general monitoring, development and/or improvement, of service, administration, security or customer conditions of the firm. PHR may share with its business partners, who are subject to the conditions of this authorization, the results of the above studies, analysis, customizations and applications, as well as all information and personal data supplied by the owners. **G.** If PHR is not in the ability to perform the data processing on its own, it may transfer the collected data to be processed by a third party, with a prior notice to the holders of the collected data, which will be in charge of treatment and must ensure appropriate conditions of confidentiality and the security of transferred information for processing.

3. Rights of Holders:

(i) Meet, update and correct personal data before PHR, as responsible or processor, or exercise the right against whom you have received as a result of data transmission thereof. This right may be exercised, among others, versus partial, inaccurate, incomplete, staggered, misleading data, or those whose treatment is prohibited or not authorized; (ii) Request proof of authorization granted to PHR as controller unless expressly excepted as a requirement for treatment; (iii) To be informed by PHR, as the controller or the processor, upon request, of the use that has been given to personal information; (iv) Submit before the Superintendency of Industry and Commerce complaints of infringements of rules on personal data protection; (v) To revoke the authorization and/or request removal of personal information treatment when the principles, rights and legal and constitutional guarantees are not respected.; (vi) Access free personal data that has undergone treatment.

4. Sensitive Data:

You have the right to choose not to provide any sensitive information requested by PHR, related amongst other, to information about your racial or ethnic origin, membership of trade unions, social organizations or human rights, political, religious, sexual life, health or biometric data.

5. Minors' Information:

The provision of personal data is optional for minors and should be provided with the permission of the parents or legal guardians of the child.

6. Care Petitions, Complaints, Inquiries and Complaints:

To make requests, inquiries and complaints in order to exercise the right to know, update, modify, delete data or revoke an authorization, or in cases which require more information about the processing of personal data please contact PHR from Monday thru Friday, from 8:00 a.m. to 12:00 M and 2:00 PM to 6:00 PM on 325 73 00 extension 482 or by email protecciondedatos@phrlegal.com.

7. Procedures for exercising the rights:

- A.** You have the right to request proof of authorization granted to PHR and to learn, update and correct your personal data. For this, queries may be made from Monday to Friday by email protecciondedatos@phrlegal.com.

When making your request for consultation you must submit the following documents:

- If you are the Holder: Attach copy of your identity document (cc, ti, ce or passport).
- If you are the Successor in interest: Attach a copy of the identity document of the applicant, a copy of the death record of the Holder, a document certifying your quality as successor and a copy of the identity document of the Holder.
- If you are a legal representative and/or attorney: Attach a copy of the identity document of the applicant, a document stating your quality as legal representative and/or attorney and a copy of the identity document of the Holder.

The query will be answered in a maximum term of ten (10) business days from the date of filing.

When it is not possible to satisfy the query within that term, you will be informed on the reasons for the delay and the date that your inquiry will be met, which in no case shall exceed five (5) business days following the expiration of the first term.

You will have free access to your personal data and the information requested may be provided by any means, including electronic, as required.

- B.** Request for deletion of information from our database or revocation of the authorization given for the processing of personal data.

To request the removal of your personal information from our database or revoke the authorization given for the treatment of personal information, you may file a request from Monday to Friday to the email protecciondedatos@phrlegal.com.

Your request must indicate your intention of removing your personal data from our databases or of revoking the authorization given for the processing of personal data. Also, the request must clearly identify the holder's name, the identification number and contact details (updated phone number and email).

When making your request for consultation you must submit the following documents:

If you are the Holder: Attach copy of your identity document (cc, ti, ce or passport).

If you are the Successor in interest: Attach a copy of the identity document of the applicant, a copy of the death record of the Holder, a document certifying your quality as successor and a copy of the identity document of the Holder.

If you are a legal representative and/or attorney: Attach a copy of the identity document of the applicant, a document stating your quality as legal representative and/or attorney and a copy of the identity document of the Holder.

If the application is incomplete, the person interested will be required within five (5) days following the receipt thereof to remedy the flaws. After two (2) months following the date of application, if the

applicant has not submitted the required information, he/she/it will be deemed to have abandoned the claim.

If the recipient of the claim is not competent to resolve, it will notify the person concerned within a maximum period of two (2) business days and shall inform the person concerned of the situation.

Upon receipt of the completed application, the legend "pending application" and the reason for it shall be included in the database within a term not exceeding two (2) business days. This legend will remain until the application has been decided on.

The maximum term to meet the request shall be fifteen (15) business days from the day following the date of its receipt. When it is not possible to fulfill the request within that period, you shall be informed about the reasons for the delay and the date by which your request will be met, which in no case shall exceed eight (8) business days following the expiration of the first term.

8. Security of Information:

PHR has taken reasonable measures to protect the information of the Holders and to prevent unauthorized access to your data or any modification, unauthorized disclosure or destruction of security access. Access to personal data is restricted to those employees, contractors, representatives and agents who process PHR data and who need to know it to perform their duties and develop the corporate purpose of the entity. PHR does not allow access to this information to third parties under conditions different from those announced, except for an express request from the data Holder or persons entitled to it in accordance with national regulations.

Nevertheless, PHR is not responsible for cyber-attacks and generally any action that aims to violate the security measures established for the protection of personal data and different information to the one contained in your computers or those contracted through third parties.

9. Date of entry into force of the Policy for Information Processing and lifetime of the PHR databases:

This policy will take effect as of July 26, 2013 and the databases will be maintained until the completion of the corporate purpose of PHR.