

<DOCUMENT NAME>		
PERSONAL DATA PROCESSING POLICY		
<DOCUMENT CODE> IN-AZD56-F01	<LAST REVISION DATE> 23/12/2022	<REVIEW STATUS> 08

PRIVACY POLICY, TREATMENT AND PROTECTION OF PERSONAL DATA

With the authorization of the processing of personal data, the owner of the same accepts the terms of this policy. INSURCOL is respectful of the personal data and information provided by its clients, workers, suppliers and other current, past and potential interest groups. This Privacy Policy establishes the purposes, measures and procedures of our databases, as well as the mechanisms available to the owners to know, update, rectify, delete the data provided or revoke the authorization.

1. **RESPONSIBLE FOR DATA PROCESSING.** The person responsible for processing personal data is INSURCOL, identified with NIT. 800042972-6, who has the following contact information:
 - a) Main address: Bucaramanga
 - b) Address: Calle 41 No 21-32
 - c) Email: datapersonales@insurcol.com
 - d) Telephone number: (57-) 6 700100
 - e) Website: www.insurcol.com

2. **PERSONAL DATA.** The information subject to processing by INSURCOL, hereinafter in this document "Personal Data", is that provided by the Owners, when they access their goods and/or services, or on the occasion of them, such as: name, surname, identification, age, sex, telephone, physical and electronic address, telephone number, country, city, financial and/or accounting information, profession, trade, commercial and/or work experience, academic training, family data, and other necessary data that are requested in the registration process. Likewise, INSURCOL will process personal data obtained through its video surveillance systems. The collection of personal data through video surveillance systems at INSURCOL will be carried out through security cameras installed in each of its headquarters and in the properties that the company provides for security.

3. **TREATMENT AND PURPOSE OF THE DATABASE.** The data collected by INSURCOL will be treated in accordance with this policy and will be limited to those personal data that are relevant and appropriate for the purpose for which they are collected or required in accordance with current regulations and in this sense, the data to be requested from each one of the interest groups, for example, workers, clients, suppliers will depend on the information required for the specific purpose of the Treatment. The main purposes of the databases are:

FOR COSTUMERS

- a) Inform clients about the services provided by the organization.
- b) For administrative, commercial and advertising purposes and contact with their owners.
- c) Maintain contact with our clients in the execution of civil and commercial contracts.
- d) Establish communication between INSURCOL and the OWNER for any purpose related to the purposes established in this policy, whether through calls, text messages, emails, physical and/or corporate telephone applications.
- e) Audit, study, analyze and use the information in the Database to design, implement and develop programs, projects and events.
- f) Audit, study, analyze and use the information in the Database for the socialization of policies, projects, programs, results and organizational changes.
- g) Offer products and/or services
- h) Evaluate the consumption habits of the owners, perform market and/or statistical analysis and/or segmentation.
- i) Request the opinion of the Owner on products and/or services
- j) When the information must be disclosed to comply with laws, regulations or legal processes, to ensure compliance with the terms and conditions, to stop or prevent fraud, attacks on the security of INSURCOL or others, prevent technical problems or protect the rights of others as required by terms and conditions or law.
- k) Carry out the pertinent steps for the development of the company's corporate purpose in what has to do with compliance with the purpose of the contract entered into with the Owner of the information.
- l) Manage procedures (requests, complaints, claims).
- m) Carry out satisfaction surveys regarding the goods and services offered by INSURCOL

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- n) Provide contact information to the commercial force and/or distribution network, telemarketing, market research and any third party with which INSURCOL has a contractual relationship.
- o) Contact the Owner through telephone means to carry out surveys, Studies and/or confirmation of personal data necessary for the execution of a contractual relationship.
- p) Contact the Owner through electronic means – SMS or chat to send news related to service improvement campaigns.
- q) Contact the Owner via email to send any type of information, account statements or invoices in relation to the obligations derived from the contract entered into between the parties.
- r) Provide the services offered by INSURCOL and accepted in the signed contract.
- s) Provide information to third parties with whom INSURCOL has a contractual relationship and it is necessary to deliver it to them for the fulfillment of the contracted object.
- t) The others described in this policy or in the Law.

FOR SUPPLIERS

- a) Maintain contact with suppliers for the acquisition of goods and/or services and request quotes, as well as develop possible businesses.
- b) Establish communication between INSURCOL and the OWNER for any purpose related to the purposes established in this policy, whether through calls, text messages, corporate telephone applications, emails and/or physical.
- c) Audit, study, analyze and use the information in the Database to design, implement and develop programs, projects and events.
- d) Audit, study, analyze and use the information in the Database for the socialization of policies, projects, programs, results and organizational changes.
- e) Evaluate the consumption habits of the owners, perform market and/or statistical analysis and/or segmentation.
- f) Request the opinion of the Owner on products and/or services
- g) When the information must be disclosed to comply with laws, regulations or legal processes, to ensure compliance with the terms and conditions, to stop or prevent fraud, attacks on the security of INSURCOL or others, prevent technical problems or protect the rights of others as required by terms and conditions or law.
- h) Carry out the pertinent steps for the development of the company's corporate purpose in what has to do with compliance with the purpose of the contract entered into with the Owner of the information.
- i) Manage procedures (requests, complaints, claims).
- j) Provide contact information to the commercial force and/or distribution network, telemarketing, market research and any third party with which INSURCOL has a contractual relationship.
- k) Contact the Owner through telephone means to carry out surveys, Studies and/or confirmation of personal data necessary for the execution of a contractual relationship.
- l) Contact the Owner through electronic means – SMS or chat to send news related to service improvement campaigns.
- m) Contact the Owner via email to send any type of information, account statements or invoices in relation to the obligations derived from the contract entered into between the parties.
- n) Provide the services offered by INSURCOL and accepted in the signed contract.
- o) Provide information to third parties with whom INSURCOL has a contractual relationship and it is necessary to deliver it to them for the fulfillment of the contracted object.
- p) The others described in this policy or in the Law.

FOR WORKERS

- a) Obtain contact information, training and other relevant information necessary during the selection processes and eventual labor relations.
- b) When the information must be disclosed to comply with laws, regulations or legal processes, to ensure compliance with the terms and conditions, to stop or prevent fraud, attacks on the security of INSURCOL or others, prevent technical problems or protect the rights of others as required by terms and conditions or law.

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- c) Carry out the pertinent steps for the development of the company's corporate purpose in what has to do with compliance with the purpose of the contract entered into with the Owner of the information.
- d) Manage procedures (requests, complaints, claims).
- e) Contact the Owner through telephone means to carry out surveys, Studies and/or confirmation of personal data necessary for the execution of a contractual relationship.
- f) Contact the Owner through electronic means – SMS, corporate telephone applications. or chat to send news related to service improvement campaigns.
- g) Contact the Owner via email, corporate telephone applications. for sending any type of information, account statements or invoices in relation to the obligations derived from the contract entered into between the parties.
- h) Comply with the obligations contracted by INSURCOL with the Information Owner, in relation to the payment of salaries, social benefits and other remuneration established in the employment contract or as provided by law.
- i) Offer corporate welfare programs and plan business activities for the owner and beneficiaries (children, spouse, permanent partner).
- j) The others described in this policy or in the Law.

The data collected by INSURCOL's Video Surveillance Systems in each of its headquarters is used for the following purposes:

- a) Guarantee the security of assets and people that are part of the organization.
- b) Ensure compliance with the labor obligations of INSURCOL workers.
- c) Have a temporary record of the images to be used in disciplinary investigations.
- d) Be used in possible judicial and/or extrajudicial processes in which INSURCOL is involved.

4. PROCESSING OF SENSITIVE DATA: The sensitive data collected will be processed for the following purposes:

- In order to comply with the provisions of article 2.2.4.6.12. Fourth paragraph (4) of Decree 1072 of 2015, according to which, the employer must keep available and duly updated, among others: "The report on health conditions, along with the sociodemographic profile of the working population and according to the guidelines of the "epidemiological surveillance programs in accordance with the risks existing in the organization."
- For the purpose of making union dues contributions for those workers linked to an industry union.

5. AUTHORIZATION FOR COLLECTION AND PROCESSING OF PERSONAL DATA AND OTHER INFORMATION. Through express verbal or written authorization, the Owner expressly or unequivocally authorizes INSURCOL to collect personal data and any other information provided, as well as to process their personal data, in accordance with this Privacy Policy and the law.

6. INFORMATION AND DATA OF MINORS. INSURCOL does not use, store, or process any personal data of minors. If, due to any fraud or error, information about a minor is stored, it will be deleted from our databases immediately, once it is known that the data belongs to a minor.

7. STORAGE OF PERSONAL DATA. The Owner expressly authorizes INSURCOL to store it in the way he considers most appropriate and complies with the security required for data protection.

8. SECURITY MEASURES: INSURCOL is committed to the correct use and processing of personal data, avoiding unauthorized access by third parties that allows us to know or violate, modify, disclose and/or destroy the information that resides in its databases. For this reason, INSURCOL has security and access protocols to its information, storage and processing systems, including physical measures to control security risks.

9. RIGHTS OF THE OWNERS. INSURCOL informs the owners that, in accordance with current legislation, they have the right to know, update, rectify their information, and/or revoke the authorization for its treatment. In particular, they are the rights of the owners as established in article 8 of Law 1581 of 2012:

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- a) Know, update and rectify your information regarding partial, inaccurate, incomplete, fragmented, misleading data, or those whose processing is prohibited or has not been authorized.
- b) Request proof of the authorization granted.
- c) Be informed, upon request, regarding the use that has been given to your personal data,
- d) Submit complaints to the Superintendency of Industry and Commerce for violations of the provisions of the law.
- e) Revoke the authorization and/or request the deletion of the data, provided that there is no legal or contractual duty that prevents deletion.
- f) Access free of charge to your personal data that has been processed.
- g) Refrain from answering questions about sensitive data. Responses that relate to sensitive data or data of children and adolescents will be optional.

10. PERSON - COMMITTEE IN CHARGE OF PETITIONS, CONSULTATIONS AND CLAIMS. INSURCOL has a personal data protection committee that will be responsible for ensuring compliance with current legislation on the protection of personal data, this policy and the procedures established by INSURCOL, especially for handling queries and complaints

The representative of this committee will be the compliance officer who corresponds to the Coordinator of the Systems area **JUAN CARLOS VARGAS**, who will be the person in charge of addressing the requests, complaints and claims of the owners and who has the following contact information:

- ✓ Address: Bucaramanga
- ✓ Address: Calle 41 No 21-32
- ✓ Email: datapersonales@insurcol.com
- ✓ Telephone number: (57-) 6 700100

In case of temporary or permanent absence of engineer Juan Carlos Vargas, the assigned officer will be Mrs. Alejandra Morales Portilla who has the following contact information:

- ✓ Address: Bucaramanga
- ✓ Address: Calle 41 No 21-32
- ✓ Email: datapersonales@insurcol.com
- ✓ Telephone number: (57-) 6 700100

11. PROCEDURE FOR THE EXERCISE OF THE RIGHT OF HABEAS DATA

- a. If you wish to exercise your rights, the owner must send an email or physical email to the following contact addresses
- b. Address: Calle 41 No 21-32
- c. Email: datapersonales@insurcol.com
- d. b. Requests and Queries About Personal Data. When the owner of the data or his successors wish to consult the information stored in the database, INSURCOL will respond to the request within a maximum of ten (10) days. In compliance with the provisions of Law 1581 of 2012, when it is not possible to attend to the query within said term, the user will be informed, the reasons for the delay will be expressed and the date on which their query will be attended will be indicated. which may not exceed five (5) business days following the expiration of the first term.
- e. c. Revocation of authorization, withdrawal or deletion of the Database and claims about Personal Data. When the owner of the data or his successors consider that the information contained in the databases must be corrected, updated or deleted, or when they notice the alleged breach of any of the duties contained in Law 1581 of 2012, they may present a claim before INSURCOL, which will be processed under the following rules:
- f. d. The claim will be made through a request addressed to INSURCOL. For the filing and attention of your request, we ask you to provide the following information:
 - I. Full name and surname

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- II. Contact information (physical and/or electronic address and contact telephone numbers),
- III. Means to receive a response to your request,
- IV. Reason(s)/fact(s) that give rise to the claim with a brief description of the right you wish to exercise (know, update, rectify, request proof of the authorization granted, revoke it, delete, access the information)
- V. Signature (if applicable) and identification number.
- VI. SAW. Annexes of the documents that you want to assert.

If the claim is incomplete, INSURCOL may require the interested party to correct the deficiencies within five (5) days following receipt of the claim. After two (2) months from the date of the request, without the applicant presenting the required information, it will be understood that he has withdrawn the claim. In the event that INSURCOL is not competent to resolve the claim, it will notify the appropriate party within a maximum period of two (2) business days and will inform the Owner of the situation, thereby relieving it of any claim or responsibility for the use, rectification or deletion of data.

Once the complete claim is received, a legend that says "claim in process" and the reason for it will be included in the database within a period of no more than two (2) business days. Said legend must be maintained until the claim is decided.

The maximum term to address the claim will be fifteen (15) business days counted from the day following the date of receipt. When it is not possible to attend to the claim within said term, the Owner will be informed of the reasons for the delay and the date on which his claim will be attended to, which in no case may exceed eight (8) business days following the expiration of the first term.

12. VALIDITY The personal data incorporated into the Database will be valid for the period necessary to fulfill its purposes.

The databases in which personal data will be recorded will have a validity equal to the time in which the information is maintained and used for the purposes described in this policy. Once that purpose(s) is fulfilled and as long as there is no legal or contractual duty to retain your information, your data will be deleted from our databases.

13. CHANGES IN THE PRIVACY POLICY. Any substantial change in the Treatment policies will be promptly communicated to the Owners by publication on our web portals.

14. CURRENT LEGISLATION. The current national legislation on the protection of personal data is contained in Law 1581 of 2012, Decree 1377 of 2013 and Law 1266 of 2008 and the regulations that modify or complement it.

ALVARO GONZALEZ RODRIGUEZ
General manager

Last review date: September 25, 2023
Current Review Date: December 11, 2023

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It was updated on the website: YES NO
Website update date: December 11, 2023

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