

## **MANUAL OF WEB POLICIES AND SECURITY**

#### **PROCEDURES**

#### 1. LEGAL BASIS AND SCOPE OF APPLICATION

The Right to Data Protection aims to enable all individuals to know, update, and rectify the information that has been collected about them in files or databases. This constitutional right is established in Articles 15 and 20 of the Political Constitution of Colombia; in Statutory Law 1581 of 2012, which sets forth general provisions for the Personal Data Protection Law (LEPD); in Decree 1074 of 2015; and in Chapter 25, Section 3, Article 2.2.2.25.3.2 of Decree 1074 of 2015, which partially regulates Law 1581 of 2012. When the Data Subject grants consent for their information to be included in a database belonging to an institution—whether public or private, legal or natural—this is done through the data controller, who assumes a series of obligations. These include handling such data securely and carefully, ensuring its integrity, and serving as the entity to which the Data Subject may turn to follow up on and control the information, thereby exercising their rights to make inquiries and claims.

Although the responsibility for data processing lies with the data controller, their duties are carried out through the actions of their service personnel. The staff of the institution responsible for data processing, with either direct or indirect access to databases containing personal data, must be familiar with data protection regulations, the organization's data protection policy, and the **Manual of Habeas Data Policies and Procedures**. They must also comply with all obligations related to data security according to their role and position.

To ensure compliance with its data security obligations, **COLOMBIA EN COLORES S.A.S.** appoints four security officers responsible for developing, coordinating, monitoring, and verifying the implementation of the security measures established in the **Manual of Habeas Data Policies and Procedures**.

This policy applies to all personal data recorded in databases that are subject to processing by the data controller and is directed at all data users, including both internal staff and external personnel of **COLOMBIA EN COLORES S.A.S.** 



All users identified in this Security document are required to comply with the security measures established for data processing and are subject to the duty of confidentiality, even after their employment or professional relationship with the data controller organization has ended. The duty of confidentiality, as set forth in Article 4, paragraph (h) of the Personal Data Protection Law (LEPD), is formalized through the signing of a confidentiality agreement between the user and the data controller.

Type of Legal Instrument	Number and Date of Enactment	Title	Issued by	Specific Application
Statutory Law	1581 Of 2012	"By which general provisions are issued for the protection of personal data".	Congress of the Republic	Through which the constitutional right of all individuals to know, update, and rectify the information collected about them in databases or files is established, along with the other rights, freedoms, and constitutional guarantees referred to in Article 15 of the Political Constitution; as well as the right to information enshrined in Article 20 of the same Constitution.
Law	1273 Of 2009	Through which the Penal Code is amended, creating a new legally protected interest—referred to as 'the protection of information and data	Congress of the Republic.	Through which the Penal Code is amended, creating a new legally protected interest—referred to as 'the protection of information and data'—and ensuring the comprehensive preservation of systems that use information and communication technologies, among other provisions



Decree	1377 of 2013	Through which Statutory Law 1581 of 2012 is partially regulated	President of the Republic of Colombia	By which Statutory Law 1581 of 2012 is partially implemented, setting forth general provisions for the protection of personal data
Decree	1074 of 2015	By which the Single Regulatory Decree for the Commerce, Industry, and Tourism Sector is enacted.	President of the Republic of Colombia	Within the scope of its authority, the Ministry of Commerce, Industry, and Tourism has the primary objective of formulating, adopting, directing, and coordinating general policies for the country's economic and social development, particularly those related to the competitiveness, integration, and growth of the industrial productive sectors.

# 2. DEFINITIONS ESTABLISHED IN ARTICLE 3 OF THE LEPD AND IN CHAPTER 25, SECTION 1, ARTICLE 2.2.2.25.1.3 OF DECREE 1074 OF 2015

**Authorized Access:** Authorization granted to a user for the use of specific resources. In automated devices, it is the result of a correct authentication, generally through the entry of a username and password.

**Authentication:** Procedure for verifying the identity of a user.

COLOMBIA EN COLORES SAS NIT : 900.60.55.13-9 CARTAGENA DE INDIAS - BOLIVAR Cel : 3165424166









**Authorization:** Prior, express, and informed consent of the Data Subject to carry out the processing of personal data.

**Privacy Notice:** Verbal or written communication issued by the data controller, addressed to the Data Subject, regarding the processing of their personal data. It informs the Data Subject about the existence of applicable data processing policies, how to access them, and the purposes intended for the processing of the personal data.

**Database:** An organized set of personal data subject to processing.

**Password:** A secret code that allows access to previously inaccessible devices, information, or databases. It is used in user authentication to enable authorized access.

**Access Control:** Mechanism that allows access to devices, information, or databases through authentication.

**Backup Copy:** A copy of the data from a database stored in a medium that allows its recovery.

**Personal Data:** Any information linked to, or that can be associated with, one or more identified or identifiable natural persons.

**Public Data:** Data that is not semi-private, private, or sensitive. Examples include information regarding marital status, profession or trade, and status as a merchant or public servant. By nature, public data may be contained in, among other sources, public records, official documents, government gazettes and bulletins, and duly executed judicial rulings not subject to confidentiality.

**Sensitive Data:** Data considered sensitive is that which affects the privacy of the Data Subject or whose improper use could result in discrimination. This includes, among others, information revealing racial or ethnic origin, political orientation, religious or philosophical beliefs, membership in trade unions, social or human rights organizations, or affiliations promoting the interests of any political party

COLOMBIA EN COLORES SAS NIT : 900.60.55.13-9 CARTAGENA DE INDIAS - BOLIVAR Cel : 3165424166









or that guarantee the rights and protections of opposition political parties, as well as data relating to health, sexual life, and biometric data.

**Data Processor:** Natural or legal person, public or private, who, alone or in association with others, processes personal data on behalf of the data controller.

**Identification:** Process of recognizing the identity of users.

**Incident**: Any anomaly that affects or could affect data security, constituting a risk to the confidentiality, availability, or integrity of databases or the personal data they contain.

**User Profile:** Group of users granted access.

**Protected Resource:** Any component of the information system, such as databases, programs, media, or equipment, used for storing and processing personal data.

**Security Officer:** One or more persons appointed by the data controller to control and coordinate security measures.

**Information System:** Set of databases, programs, media, and/or equipment used for processing personal data.

**Data Controller**: Natural or legal person, public or private, who, alone or in association with others, determines the database and/or the processing of the data.

**Medium / Storage Device:** Material on which information is recorded or on which data can be stored or retrieved, such as paper, videotape, CD, DVD, hard drive, etc.

**User:** Subject authorized to access data or resources, or a process that accesses data or resources without identifying a subject.

**Data Subject:** Natural person whose personal data is being processed.

COLOMBIA EN COLORES SAS NIT : 900.60.55.13-9 CARTAGENA DE INDIAS - BOLIVAR Cel : 3165424166









**Processing:** Any operation or set of operations performed on personal data, such as collection, storage, use, circulation, or deletion.

**Transfer:** A transfer of data occurs when the data controller and/or data processor, located in Colombia, sends the information or personal data to a recipient who, in turn, is responsible for the processing and is located either inside or outside the country.

**Transmission:** Processing of personal data that involves communicating such data within or outside the territory of the Republic of Colombia for the purpose of processing by the data processor on behalf of the data controller.

#### 3. DATA PROTECTION PRINCIPLES

Article 4 of the Personal Data Protection Law (LEPD) establishes principles for the processing of personal data that must be applied in a harmonious and comprehensive manner in the development, interpretation, and implementation of the Law. The legal principles of data protection are as follows:

**Principle of Legality:** Data processing is a regulated activity that must comply with the provisions of the Personal Data Protection Law (LEPD), Decree 1074 of 2015, and other provisions that develop it.

**Principle of Purpose:** Data processing must pursue a legitimate purpose in accordance with the Constitution and the Law, which must be communicated to the Data Subject.

**Principle of Freedom:** Data processing may only 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 a legal or judicial mandate that establishes consent. Data processing requires the prior and informed authorization of the Data Subject by any means that allows it to be consulted afterward, except in the following cases exempted by Article 10 of the Personal Data Protection Law (LEPD)

COLOMBIA EN COLORES SAS NIT : 900.60.55.13-9 CARTAGENA DE INDIAS - BOLIVAR Cel : 3165424166









Information required by a public or administrative entity in the exercise of its legal functions or by court order.

- Data of a public nature.
- Cases of medical or health emergencies.
- Processing of information authorized by law for historical, statistical, or scientific purposes.
- Data related to the Civil Registry of individuals.

**Principle of Accuracy or Quality:** Information subject to processing must be truthful, complete, accurate, up-to-date, verifiable, and understandable. The processing of partial, incomplete, fragmented, or misleading data is prohibited.

**Principle of Transparency:** Data processing must guarantee the Data Subject's right to obtain, at any time and without restrictions, information from the data controller or data processor about the existence of data concerning them. When requesting authorization from the Data Subject, the data controller must clearly and explicitly inform them of the following, while keeping proof of compliance with this duty:

- The processing to which their data will be subjected and its purpose.
- The optional nature of the Data Subject's response to questions concerning sensitive data or data of children and adolescents.
- The rights of the Data Subject.
- The identification, physical address, email, and telephone number of the data controller.

COLOMBIA EN COLORES SAS NIT : 900.60.55.13-9 CARTAGENA DE INDIAS - BOLIVAR Cel : 3165424166









Principle of Restricted Access and Circulation: Data processing is subject to the limits derived from the nature of personal data, the provisions of the Personal Data Protection Law (LEPD), and the Constitution. In this sense, processing may only be carried out by persons authorized by the Data Subject and/or by persons provided for by law. Personal data, except for public information, must not be made available on the Internet or other mass communication media, unless access is technically controllable to provide restricted knowledge only to the Data Subjects or third parties authorized in accordance with the law.

**Principle of Security**: Information subject to processing by the data controller or data processor must be handled with the technical, human, and administrative measures necessary to ensure the security of records, preventing their alteration, loss, consultation, use, or unauthorized or fraudulent access. The data controller is responsible for implementing the corresponding security measures and informing all personnel who have direct or indirect access to the data. Users accessing the data controller's information systems must know and comply with the security rules and measures corresponding to their functions. These rules and security measures are outlined in the Habeas Data Policies and Procedures Manual, which is mandatory for all users and personnel of COLOMBIA EN COLORES S.A.S. Any modifications to the rules and measures regarding personal data security by the data controller must be communicated to the users.

**Principle of Confidentiality:** All people involved in the processing of personal data that is not public are obliged to guarantee the confidentiality of the information, even after their relationship with any of the activities involved in the processing has ended. Personal data may only be supplied or communicated when it corresponds to the execution of activities authorized by the LEPD and under its terms.

COLOMBIA EN COLORES SAS NIT : 900.60.55.13-9 CARTAGENA DE INDIAS - BOLIVAR Cel : 3165424166 Members of:









#### 4. SPECIAL CATEGORIES OF DATA

#### 4.1. SENSITIVE DATA

Sensitive Data are those that affect the privacy of the Data Subject or whose improper use may result in discrimination, such as data revealing racial or ethnic origin, political orientation, religious or philosophical convictions, membership in trade unions, social or human rights organizations, or affiliations promoting the interests of any political party or guaranteeing the rights and protections of opposition political parties, as well as data relating to health, sexual life, and biometric data.

According to Article 6 of the Statutory Law on Personal Data Protection (LEPD), the processing of sensitive data is prohibited, except when:

- The Data Subject has given explicit consent for such processing, except in cases where the law does not require such consent.
- The processing is necessary to safeguard the vital interest of the Data Subject, and they are physically or legally incapacitated. In such cases, legal representatives must provide authorization.
- The processing is carried out in the course of legitimate activities, with appropriate guarantees, by a foundation, NGO, association, or any other non-profit organization whose purpose is political, philosophical, religious, or related to labor unions, provided it refers exclusively to its members or to individuals who maintain regular contact due to the organization's purpose. In these cases, the data may not be disclosed to third parties without the authorization of the Data Subject.
- The processing pertains to data necessary for the recognition, exercise, or defense of a right in judicial proceedings.
- The processing has a historical, statistical, or scientific purpose. In this case, measures must be adopted to suppress the identity of the Data Subjects.

COLOMBIA EN COLORES SAS NIT : 900.60.55.13-9 CARTAGENA DE INDIAS - BOLIVAR Cel : 3165424166









## 4.2. RIGHTS OF CHILDREN AND ADOLESCENTS (MINORS)

The processing of personal data of children and adolescents is prohibited, except when the data is of a public nature and when such processing meets the following requirements:

- It responds to and respects the best interests of the children and adolescents.
- It ensures the protection of their fundamental rights.

Once these requirements are met, the legal representative of the child or adolescent must provide authorization, following the exercise of the minor's right to be heard. The minor's opinion shall be taken into account, considering their maturity, autonomy, and capacity to understand the matter.

It is the responsibility of the State and educational institutions of all types to provide information and training to legal representatives and guardians regarding the potential risks children and adolescents face with respect to the improper processing of their personal data. They must also provide guidance on the responsible and safe use of personal data by children and adolescents, their right to privacy, and the protection of their own and others' personal information.

All data controllers and processors involved in the processing of personal data of children and adolescents must ensure the proper use of such data, at all times complying with the principles and obligations established in the LEPD and Decree 1074 of 2015. In all cases, processing must respect the prevailing rights of children and adolescents.

The rights of access, correction, deletion, revocation, or claims for violations concerning the data of children and adolescents shall be exercised by the persons authorized to represent them.

COLOMBIA EN COLORES SAS NIT : 900.60.55.13-9 CARTAGENA DE INDIAS - BOLIVAR Cel : 3165424166









#### 4.3. RIGHTS OF DATA SUBJECTS

In accordance with Article 8 of the LEPD and Chapter 25, Section 4 of Decree 1074 of 2015, Data Subjects may exercise a series of rights regarding the processing of their personal data. These rights may be exercised by the following persons:

- By the Data Subject themselves, who must sufficiently prove their identity through the various means provided by the data controller.
- By their heirs, who must demonstrate such status.
- By the representative and/or attorney of the Data Subject, upon prior verification of the representation or power of attorney.
- By stipulation in favor of another and for another.
- The rights of children and adolescents shall be exercised by the persons authorized to represent them.

## THE RIGHTS OF THE DATA SUBJECT ARE AS FOLLOWS:

**Right of Access or Consultation:** This is the right of the Data Subject to be informed by the data controller, upon request, regarding the origin, use, and purpose given to their personal data.

#### RIGHTS TO COMPLAINTS AND CLAIMS: THE LAW DISTINGUISHES FOUR TYPES OF CLAIMS:

**Correction Claim:** The right of the Data Subject to have partial, inaccurate, incomplete, fragmented, or misleading data, or data whose processing is expressly prohibited or unauthorized, updated, rectified, or modified.

**Deletion Claim:** The right of the Data Subject to have data deleted that is inappropriate, excessive, or that does not comply with constitutional and legal principles, rights, and guarantees.

COLOMBIA EN COLORES SAS NIT : 900.60.55.13-9 CARTAGENA DE INDIAS - BOLIVAR Cel : 3165424166









**Violation Claim:** The right of the Data Subject to request that any noncompliance with Data Protection regulations be remedied.

**Right to Request Proof of Authorization Granted to the Data Controller**: This right applies except when explicitly exempted as a requirement for processing in accordance with Article 10 of the LEPD.

**Right to File Complaints with the Superintendence of Industry and Commerce for Violations:** The Data Subject or their heirs may only submit this complaint after having exhausted the consultation or claim procedure with the data controller or data processor.

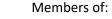
#### 5. AUTHORIZATION OF THE DATA PROCESSING POLICY.

In accordance with Article 9 of the LEPD, the processing of personal data requires the prior and informed authorization of the Data Subject. By accepting this policy, any Data Subject who provides information regarding their personal data is consenting to the processing of their data by COLOMBIA EN COLORES S.A.S., under the terms and conditions set forth herein.

#### The Data Subject's authorization shall not be required in the following cases:

- Information required by a public or administrative entity in the exercise of its legal functions or by court order.
- Data of a public nature.
- Cases of medical or health emergencies.
- Processing of information authorized by law for historical, statistical, or scientific purposes.
- Data related to the Civil Registry of individuals.

COLOMBIA EN COLORES SAS NIT : 900.60.55.13-9 CARTAGENA DE INDIAS - BOLIVAR Cel : 3165424166











#### 6. DATA CONTROLLER.

The data controller responsible for the databases covered by this policy is **COLOMBIA EN COLORES S.A.S**, whose contact information is as follows:

Email: mice@colombiaencolores.com

Mobile: +57 304 352 7750

**COLOMBIA EN COLORES S.A.S**, in the course of its activities, carries out the processing of personal data related to natural persons, which are contained and managed in databases intended for legitimate purposes, in compliance with the Constitution and the Law.

In accordance with the provisions of **Law 1581 of 2012** and the authorizations granted by the data subjects, **COLOMBIA EN COLORES S.A.S** will perform operations or sets of operations that include the collection, storage, use, circulation, and/or deletion of data, as well as the transfer of data to third parties acting as data processors or controllers, according to the agreements reached between the parties. This data processing will be carried out exclusively for the purposes authorized and established in this Policy and in the specific authorizations granted by the data subjects.

Likewise, personal data will be processed when there is a legal or contractual obligation to do so, always in accordance with the **Information Security Policies** of **COLOMBIA EN COLORES S.A.S**. In all cases, personal data may be processed for the purpose of carrying out internal and external control and audit processes, as well as evaluations conducted by supervisory authorities.

Furthermore, in the execution of the corporate purpose of **COLOMBIA EN COLORES S.A.S**, personal data will be processed according to the relevant stakeholder group and in proportion to the purpose(s) associated with each type of processing, as described below:

The following table presents the different databases and the purposes assigned to each of them.

COLOMBIA EN COLORES SAS NIT : 900.60.55.13-9 CARTAGENA DE INDIAS - BOLIVAR Cel : 3165424166









## **Databases and Purposes**

## **Employees**

The data shall be used for the following purposes: to request information related to personal identification, contact details, academic background, employment, professional, and financial history; to properly manage the registration and employment linkage process; to implement employee welfare programs; to disseminate internal job offers for participation in selection processes within the Institution; to communicate institutional information; to carry out statistical analyses; to properly update data; to manage the registration of employees in congresses, events, or seminars organized by the Institution; to verify and update employee and family member information (spouse, parents, children); to schedule interviews for applicants in the selection process, to conduct home visits, and to verify employment and personal references, work experience, and professional background.

It also includes providing information to companies with which agreements exist, to the employee fund, for the preparation of uniforms, sending information through text messages and emails, delivering and assigning equipment to employees, drafting human resources reports, affiliating employees and their beneficiaries to the social security system and family compensation funds, issuing employment references, using photographic images and videos for corporate purposes, collecting and providing information about employees' children for recreational or welfare activities carried out by the Institution or its partner entities, conducting performance evaluations, issuing employment, promotion, or transfer certificates, conducting exit interviews, fulfilling internal and external audit and control processes, submitting mandatory institutional reports, deactivating information systems, using fingerprints and other health and/or sensitive data for institutional purposes.

The aforementioned purposes are illustrative and not exhaustive.

COLOMBIA EN COLORES SAS NIT : 900.60.55.13-9 CARTAGENA DE INDIAS - BOLIVAR Cel : 3165424166









## **Suppliers**

The data shall be used for the following purposes: to request quotations and economic proposals for the acquisition of products and/or services; to analyze and evaluate the feasibility of each product and/or service; to send communications through text messages and emails; to submit reports to relevant supervisory authorities; to review and verify commercial references; to manage pre-contractual and contractual procedures; to provide information for internal and external audits conducted within the Institution; to send information about the company's products, services, or updates; and to perform background checks in restricted databases such as those maintained by the National Police, the Attorney General's Office, the Comptroller General's Office, SARLAFT (Anti-Money Laundering and Counter-Terrorism Financing Risk Management System), and any others required under Colombian regulations.

The aforementioned purposes are illustrative and not exhaustive.

#### Clients

The data shall be used for the following purposes: to store client information; to conduct validations and analyses related to the Anti-Money Laundering and Counter-Terrorism Financing Risk Management System (SAGRILAFT), prevention of transnational bribery, and other requirements established by Colombian law; to transmit data to entities that regulate tax and customs matters; to handle procedures such as requests, complaints, and claims; to report to credit bureaus in case of noncompliance with financial obligations arising from commercial relationships; to send communications through text messages and emails; to maintain a consumption history; to use photographic images and videos for corporate purposes; to conduct commercial management; to analyze customer behavior in stores, among institutional and e-commerce clients, and through their communication channels to make offers tailored to their needs; to send information about the company's products, services, or updates; to maintain historical records and commercial contact; and to transfer the data authorized by the data subject to entities with which agreements exist, always governed by a document ensuring that data processing complies with applicable regulations.

The aforementioned purposes are illustrative and not exhaustive.

COLOMBIA EN COLORES SAS NIT : 900.60.55.13-9 CARTAGENA DE INDIAS - BOLIVAR Cel : 3165424166









## 7. Browsing Data

The navigation system and the software necessary for the operation of this website collect certain personal data whose transmission is implicit in the use of Internet communication protocols.

By their very nature, the information collected may allow the identification of users through association with data held by third parties, even though it is not obtained for that purpose. This category of data includes, among others, the IP address or domain name of the device used by the user to access the website, the URL address, the date and time of access, and other parameters related to the user's operating system.

These data are used solely for the purpose of obtaining anonymous statistical information on the use of the website and to ensure its proper technical operation. They are deleted immediately after verification.

## 8. Cookies or Web Bugs

This website does not use cookies or web bugs to collect users' personal data. Their use is limited to facilitating user access to the website.

The use of **session cookies**, which are not permanently stored on the user's device and disappear when the browser is closed, is limited solely to collecting technical information necessary to identify the session and ensure secure and efficient access to the website.

Cookies are also used to improve user experience, understand how our services are used, and personalize them. For example, we use cookies to provide our services and other web-based functions, and to analyze which help articles are most popular in order to display relevant content related to our services.

Additionally, we may use cookies to remember the user's choices—such as language preferences—to provide a more secure experience and to customize our services according to user interests.

If the user does not wish to allow the use of cookies, they may reject or delete existing ones by configuring their browser settings or disabling the JavaScript code in the browser's security options.

COLOMBIA EN COLORES SAS NIT : 900.60.55.13-9 CARTAGENA DE INDIAS - BOLIVAR Cel : 3165424166









## **Data Subject Assistance**

Francisca Simaro shall be responsible for attending to requests, inquiries, and claims submitted by data subjects seeking to exercise their rights.

All communications may be addressed to the following email: mice@colombiaencolores.com.

**Procedures for Exercising Data Subject Rights** 

## **Right of Access or Inquiry**

In accordance with Chapter 25, Section 4, Article 2.2.2.25.4.2.21 of Decree 1074 of 2015, the data subject may access their personal data free of charge in the following cases:

- At least once per calendar month.
- Whenever substantial modifications to the data processing policies occur, which may motivate new consultations.

For inquiries made more frequently than once per calendar month, **COLOMBIA EN COLORES S.A.S.** may only charge the data subject for shipping, reproduction, or certification costs. Such costs shall not exceed the actual recovery cost of the materials used. When required, the company must provide the **Superintendence of Industry and Commerce** with evidence of such expenses.

The data subject may exercise their right of access or inquiry by submitting a written request to **COLOMBIA EN COLORES S.A.S.** via email to **mice@colombiaencolores.com**, indicating in the subject line:

"Exercise of the Right of Access or Inquiry."

The request must include the following information:

- 1. Full name of the data subject.
- 2. Photocopy of the national ID card of the data subject and, if applicable, of the person representing them, along with supporting documentation of such representation.

COLOMBIA EN COLORES SAS NIT : 900.60.55.13-9 CARTAGENA DE INDIAS - BOLIVAR Cel : 3165424166









- 3. A clear statement specifying the request for access or inquiry.
- 4. Address for notifications, date, and signature of the applicant.
- 5. Supporting documents, if applicable.

The data subject may choose one of the following methods to access the database and receive the requested information:

- On-screen display.
- Written copy or photocopy sent by certified or regular mail.
- Email or another electronic means.
- Any other system appropriate to the database's configuration or the nature of the processing.

Once the request has been received, **COLOMBIA EN COLORES S.A.S.** shall respond within a maximum of **ten (10) business days** from the date of receipt. If it is not possible to address the inquiry within this period, the interested party shall be informed of the reason for the delay and the date on which the request will be fulfilled, which shall not exceed **five (5) additional business days** following the initial deadline. These time frames are established in **Article 14 of the LEPD**.

Once the inquiry procedure has been completed, the data subject or their successors may file a complaint before the **Superintendence of Industry and Commerce**.

## **Right to File Complaints and Claims**

The data subject may exercise their right to file complaints or claims regarding their personal data by sending a written request to **COLOMBIA EN COLORES S.A.S.** at the email address **mice@colombiaencolores.com**, indicating in the subject line:

"Exercise of Complaints and/or Claims."

The request must include the following information:

1. Full name of the data subject.

COLOMBIA EN COLORES SAS NIT : 900.60.55.13-9 CARTAGENA DE INDIAS - BOLIVAR Cel : 3165424166









- 2. Photocopy of the national ID card of the data subject and, if applicable, of the person representing them, along with supporting documentation of such representation.
- 3. Description of the facts and the specific request for correction, deletion, revocation, or enforcement.
- 4. Address for notifications, date, and signature of the applicant.
- 5. Supporting documents related to the claim, when applicable.

If the claim is incomplete, the company shall notify the interested party within **five (5) business days** of receipt so that they may correct the deficiencies. If two (2) months elapse from the date of notification without the applicant providing the required information, the claim shall be considered withdrawn.

Once a complete claim has been received, a note stating "Claim in Process" and the reason for the claim shall be included in the database within two (2) business days. This note shall remain until the claim has been resolved.

**COLOMBIA EN COLORES S.A.S.** shall address the claim within a maximum of **fifteen (15) business days** from the date of receipt. If it is not possible to resolve the claim within this period, the interested party shall be informed of the reasons for the delay and the date on which their claim will be addressed, which shall not exceed **five (5) additional business days** following the initial deadline.

Once the claim procedure has been completed, the data subject or their successors may file a complaint before the **Superintendence of Industry and Commerce**.

## **Security Measures**

In compliance with the **principle of security** established in Article 4, paragraph (g) of the **Personal Data Protection Law (LEPD)**, **COLOMBIA EN COLORES S.A.S.** has implemented the necessary **technical**, **human**, and **administrative measures** to guarantee the protection of all records, preventing their alteration, loss, consultation, use, or unauthorized or fraudulent access.

Furthermore, through the signing of the corresponding data transmission contracts, **COLOMBIA EN COLORES S.A.S.** has required all data processors with whom it works to implement the necessary security measures to ensure the confidentiality and integrity of information during personal data processing.

COLOMBIA EN COLORES SAS NIT : 900.60.55.13-9 CARTAGENA DE INDIAS - BOLIVAR Cel : 3165424166









#### **Data Retention Perio**

The databases under the responsibility of **COLOMBIA EN COLORES S.A.S.** shall be subject to processing for as long as is reasonable and necessary to fulfill the purpose(s) for which the data were collected.

Once the purpose(s) of the processing have been fulfilled—and without prejudice to any legal provisions that establish otherwise—**COLOMBIA EN COLORES S.A.S.** shall proceed to delete the personal data in its possession, unless there is a legal or contractual obligation that requires their preservation.

Accordingly, these databases have been created without a defined expiration period.

## **Express Authorization**

In accordance with **Statutory Law 1581 of 2012** on Data Protection and **Decree 1074 of 2015**, I hereby authorize, as the data subject, the inclusion of my personal data in a database under the responsibility of **COLOMBIA EN COLORES S.A.S.**, to be processed for the purposes described in the **Manual of Data Protection Policies**, which I may access via the following email: **mice@colombiaencolores.com**.

Likewise, I declare that I have been informed of my right to exercise access, correction, deletion, revocation, or claim for violations concerning my personal data by submitting a written request to **COLOMBIA EN COLORES S.A.S.** at the email address **mice@colombiaencolores.com**, indicating in the subject line the right I wish to exercise.

This instrument shall enter into force on **September 30, 2025**.

**COLOMBIA EN COLORES S.A.S.** 

NIT: 900.60.55.13-9

Cartagena de Indias – Bolívar

Mobile: +57 316 542 4166

COLOMBIA EN COLORES SAS NIT: 900.60.55.13-9 CARTAGENA DE INDIAS - BOLIVAR Cel: 3165424166





