



Personal Data Processing Policy

Corporate Governance

1. Overview:

This policy is defined in line with the entry into force of Statutory Law 1581 of 2012, whose purpose is to dictate the general provisions for the protection of personal data and to develop the constitutional right of all individuals to know, update and rectify the information that has been collected about them in databases or files, as well as the right to information; therefore, **CONTACTO ESTRATÉGICO OUTSOURCING CONTABLE S.A.S.**, considering its status as data controller responsible for its data processing, hereby sets forth this text aimed at effectively complying with said regulations, and in particular for addressing any queries and complaints regarding the processing of personal data collected and handled by the company.

The right to HABEAS DATA is the right every person has to know, update and rectify the information that has been collected about him or her in files and databases of a public or private nature, and it guarantees all citizens the power to decide on, and control their personal information. Therefore, **CONTACTO ESTRATÉGICO OUTSOURCING CONTABLE S.A.S.** embraces these provisions considering that, for the performance of its corporate purpose, it is continuously compiling and conducting various treatments on databases of clients, shareholders, suppliers, professionals, commercial allies, and employees.

Pursuant to the foregoing, this information and database management policy has been designed within the legal and corporate duty of **CONTACTO ESTRATÉGICO OUTSOURCING CONTABLE S.A.S.** to protect people's right to privacy, as well as the power to know, update, or request the information about **CONTACTO ESTRATÉGICO OUTSOURCING CONTABLE S.A.S.** that is stored in databases. It describes and explains the treatment of the Personal Information to which it has access through the website, emails, physical information, telephone calls, face-to-face contact, physical or electronic means, both current or developed in the future, as well as other communications thus sent, or through third parties that participate in commercial or legal activities with all its clients, employees, suppliers, shareholders, strategic allies and related parties. This policy will be adjusted to the extent that any provisions applicable to the subject matter are regulated, and new provisions come into force.

2. Purpose

The implementation of this policy is intended to guarantee the confidentiality of the information and the security of the treatment that will be afforded to all clients, suppliers, employees and third parties of **CONTACTO ESTRATÉGICO OUTSOURCING CONTABLE S.A.S.** who have legally obtained information and personal data in compliance with the guidelines set forth by the law that regulates the right to Habeas Data. Likewise, by issuing this policy, companies comply with the provisions set forth in paragraph K of article 17 of the aforementioned law and ratify the commitment of **CONTACTO ESTRATÉGICO OUTSOURCING CONTABLE S.A.S.** regarding the rights of the owners of the information.

3. Scope

Applying this policy is mandatory in all activities involving the processing of personal data and is mandatory and strictly complied by **CONTACTO ESTRATÉGICO OUTSOURCING CONTABLE S.A.S.**, its administrators, employees in the performance of their duties, contractors and third parties acting on behalf of **CONTACTO ESTRATÉGICO OUTSOURCING CONTABLE S.A.S.**, who must abide by, comply with and respect the contents of this document, and in no case will act contrary to the duties set forth in Law 1581 of 2012 and any other regulations that modify, add or complement it.

4. Definitions

- **Authorization:** Consent which is issued on a prior, express, and informed manner by the owner of any personal data for the company to carry out the processing of their personal data.

- **Privacy notice:** Physical, electronic document generated by the Data Controller that is made available to the owners with information regarding the existence of the information processing policies that will be applicable to them, the way to gain access to them, and the characteristics of the Processing intended to be given to the personal data.
- **Database:** Set of personal data.
- **Query:** Request by the Owners of the data, or the individuals authorized by them or by law, to know the information held about them in databases or files.
- **Personal data:** Information that is linked to an individual. It is any item of information linked to one or more specific or specifiable person, or which may be associated to a natural person or legal entity. Personal data may be public, semi-private, or private.
- **Private data:** Data that, due to its intimate or reserved nature, is only relevant to the owner.
- **Public data:** Data designated as such, according to mandates of the law or the Political Constitution. Data contained in, among others, public documents, enforceable court rulings that are not subject to confidentiality, and those relating to the civil status of people, are public.
- **Semi-private data:** Semi-private data is data whose nature is not intimate, reserved, or public, and whose knowledge or disclosure may be of interest not only to its owner but also to a certain sector or group of people, or to society in general, such as financial and credit data on commercial activities.
- **Sensitive data:** Those related to racial or ethnic origin, membership in trade unions, social or human rights organizations, political, religious, or sexual life convictions, biometrics, or health data. This information may not be subject to be provided by the Owner of these data.
- **Data processor:** Natural person or legal entity, public or private, who by themselves or in association with others, engages in any processing of personal data on behalf of the data controller.
- **Complaint:** Request by the data Owner, or the persons authorized by him/her or by law, to correct, update, or delete their personal data, or when they notice there is an alleged breach of the data protection regime. Such claim shall follow the procedure stated in Article 15 of Law 1581 of 2012.
- **Data controller:** Natural person or legal entity, public or private, who by itself or in association with others, makes decisions regarding the database and/or data processing.
- **Owner:** Natural person whose data is processed by **CONTACTO ESTRATÉGICO OUTSOURCING CONTABLE S.A.S.**
- **Processing:** Any operation or set of operations on personal data which may include its collection, storage, use, circulation, or deletion.
- **Transmission:** Processing of personal data that involves the communication thereof within (national transmission) or outside (international transmission) Colombia, and whose purpose is to be subject to processing by the Data processor and on behalf of the Responsible Party.
- **Transfer:** Data transfer takes place whenever the personal data Controller and/or Processor, located in Colombia, sends the information or personal data to a recipient, who in turn is responsible for the Processing and is located within or outside of the country.

5. Rights that all owners of personal data have vis-à-vis **CONTACTO ESTRATÉGICO OUTSOURCING CONTABLE S.A.S.**

Any process that entails the processing of personal data by any area of **CONTACTO ESTRATÉGICO OUTSOURCING CONTABLE S.A.S.** of both clients, suppliers, employees and, in general, any third party with whom **CONTACTO ESTRATÉGICO OUTSOURCING CONTABLE S.A.S.** maintains commercial or labor relations, must take into account and inform the owner of such data, expressly and in advance, by any means of which a record of compliance may be kept, the rights to which that owner of the data is entitled, which are set forth below:

- Right to request and access, free of charge, the data provided that has been subject to Processing. The information requested by the owner may be provided by any means, including electronic means.

- Right to know, update, rectify, and consult your personal data at any time with **CONTACTO ESTRATÉGICO OUTSOURCING CONTABLE S.A.S.** regarding data it may consider partial, inaccurate, incomplete, fragmented, and those which may mislead. For this purpose, previously establishing the identification of the Owner is necessary to prevent unauthorized third parties from accessing the Owner's data.
- Right to request, at any time, proof of the authorization granted to **CONTACTO ESTRATÉGICO OUTSOURCING CONTABLE S.A.S.**
- Right to be informed by **CONTACTO ESTRATÉGICO OUTSOURCING CONTABLE S.A.S.**, upon request of the owner of the data, regarding the use given thereto.
- Right to file with the Superintendence of Industry and Commerce any complaints he/she may deem pertinent to assert his/her right to Habeas Data with the company.
- Right to revoke the authorization and/or request the deletion of any data whenever you consider that **CONTACTO ESTRATÉGICO OUTSOURCING CONTABLE S.A.S.** has failed to respect your constitutional rights and guarantees, provided there is no legal or contractual duty that prevents their elimination and imposes the obligation to remain in the database or file of the Data Controller or Data Processor.
- Right to refrain from answering questions about Sensitive Data or about data of children and adolescents. Responses that involve Sensitive Data or data regarding children and adolescents are optional.
- Right to access, free of charge, the personal data that you voluntarily decide to share with **CONTACTO ESTRATÉGICO OUTSOURCING CONTABLE S.A.S.**, for which purpose the company is responsible for safely and reliably preserving and archiving the duly granted authorization forms of each of the owners of personal data.
- All other rights set forth in Law 1581 of 2012 and other complementary regulations.

6. Cases where CONTACTO ESTRATÉGICO OUTSOURCING CONTABLE S.A.S. does not require authorization to process data held by it

- Whenever the information is requested from the company by a public or administrative entity acting in the exercise of its legal duties or by court order.
- Whenever it is data of a public nature because it is not protected by the scope of application of the regulation.
- Duly verified medical or health emergency events.
- In those events where the information is authorized by law to comply with historical, statistical, and scientific purposes.
- Whenever data is related to the civil registry of individuals because this information is not considered as data of a private nature.

7. To whom information may be provided by CONTACTO ESTRATÉGICO OUTSOURCING CONTABLE S.A.S. without the need for authorization from the data owners

- To the data owners, their heirs, or representatives, at any time and by any means whenever they request it from **CONTACTO ESTRATÉGICO OUTSOURCING CONTABLE S.A.S.**
- To judicial or administrative entities exercising their duties which submit a requirement to the company for delivery of the information.
- To third parties who are authorized by any law of the Republic of Colombia.
- To third parties whom the Data Owner expressly authorize to be provided with the information and whose authorization is given to **CONTACTO ESTRATÉGICO OUTSOURCING CONTABLE S.A.S.**

8. Duties that **CONTACTO ESTRATÉGICO OUTSOURCING CONTABLE S.A.S.** has vis-à-vis the data owners

CONTACTO ESTRATÉGICO OUTSOURCING CONTABLE S.A.S. acknowledges that personal data is property of its owners and that only said individuals may make decisions about it. Accordingly, it will exclusively use it for those purposes for which it is authorized by law and, for the sake thereof, it hereby states the duties it assumes in its capacity as data controller:

- **CONTACTO ESTRATÉGICO OUTSOURCING CONTABLE S.A.S.** shall find the means through which it may obtain prior and express authorization from the owner of the data to carry out any kind of processing.
- Likewise, it shall keep, in appropriate condition, a copy of the respective authorization granted by the Owner.
- **CONTACTO ESTRATÉGICO OUTSOURCING CONTABLE S.A.S.** shall clearly and expressly inform its clients, employees, suppliers and third parties in general from whom it obtains databases, the processing which they will be subject to, and the purpose of such processing. For this purpose, the company shall design the strategy through which, for each event, mechanics or data request that is made, they are informed about the respective processing. These means may be any of the following: sending text messages, filling out physical forms, and through the websites of **CONTACTO ESTRATÉGICO OUTSOURCING CONTABLE S.A.S.**, among others.
- **CONTACTO ESTRATÉGICO OUTSOURCING CONTABLE S.A.S.** must in each case inform the data owners about the optional nature of responding to and providing the respective information requested, mainly that referring to Sensitive Data or data on children and adolescents.
- In all cases where data is collected, the rights of all owners with respect to their data must be informed.
- **CONTACTO ESTRATÉGICO OUTSOURCING CONTABLE S.A.S.** must provide the identification, physical, or electronic address, and telephone number of the person or area that will be responsible for the processing.
- **CONTACTO ESTRATÉGICO OUTSOURCING CONTABLE S.A.S.** shall at all times provide guarantees to the owner of the information regarding the full and effective exercise of the right to habeas data and petition, that is, the chance to know the information about him/her existing or kept in the database, to request the updating or correction of data and handling queries, all of which will be carried out through the consultation or complaint mechanisms provided for in this policy.
- Update the information whenever necessary or at the request of the Owner or competent authority and rectify Personal Data when appropriate.
- **CONTACTO ESTRATÉGICO OUTSOURCING CONTABLE S.A.S.** must keep personal data records stored with appropriate security to prevent their deterioration, loss, alteration, unauthorized or fraudulent use, and shall regularly and in a timely manner update and rectify data, whenever the owners thereof report recent developments or requests.
- Guarantee the use of the technical, human, and administrative measures necessary to provide security to Personal Data and any other information subject to processing, preventing its adulteration, loss, consultation, unauthorized or fraudulent access or use.
- All those under the obligation to comply with this policy must bear in mind that **CONTACTO ESTRATÉGICO OUTSOURCING CONTABLE S.A.S.** is obligated to comply with the duties imposed by law. Therefore, they must act accordingly and in compliance with the previously described obligations.

9. Purposes for capturing, using, and processing personal data

CONTACTO ESTRATÉGICO OUTSOURCING CONTABLE S.A.S. in furtherance of its corporate purpose and its relations with third parties, namely clients, employees, suppliers, creditors, strategic allies, subsidiaries, subordinates, among others, constantly collects data to carry out various purposes and uses within which the following may be included:

- Administrative, commercial, promotional, informational, marketing and sales purposes.
- Offering all kinds of business services, as well as engaging in promotion, marketing, and advertising campaigns.
- Seeking a closer rapport with all its clients, suppliers, employees and related third parties.

In line with the foregoing, **CONTACTO ESTRATÉGICO OUTSOURCING CONTABLE S.A.S.** may carry out the following actions:

1. Obtain, store, compile, exchange, update, collect, process, reproduce and/or dispose of the partial or total data or information of those owners who grant it due authorization in the terms required by law and in the formats deemed as appropriate for each case.
2. Classify, order, and separate information provided by the data owner.
3. Conduct investigations, compare, verify, and validate the data obtained in due form with credit rating agencies with which it has business relations.
4. Convey the information obtained under the terms of the habeas data law to the companies with which it contracts its database capturing, storage, and management services, subject to the prior and due authorizations obtained for that purpose.
5. Transfer data or information in whole or in part to its subsidiaries, businesses, companies and/or affiliated entities and strategic allies.

10. The authorization

In order to accomplish the aforementioned purposes, **CONTACTO ESTRATÉGICO OUTSOURCING CONTABLE S.A.S.** requires unfettered, prior, express, and duly informed authorization from the data owners, and for this purpose it has implemented suitable mechanisms, for each case guaranteeing that it is possible to verify said authorization has been granted. Authorizations may be set forth in any medium, whether in a hard copy or electronic document, or in any format ensuring its subsequent consultation by means of technical or technological tools and IT security developments.

An authorization is a statement that provides the following information to the data owner:

- Who is responsible for or in charge of collecting the information.
- Data collected.
- Purposes of its processing.
- Procedure for exercising the rights to access, correct, update, or delete data.
- Information on the collection of sensitive data.

11. How to proceed upon queries and requests made by data owners

All owners of personal data have the right to submit inquiries and requests to the company regarding the handling and treatment given to their information.

A. PROCEDURE FOR PROCESSING CLAIMS OR REQUESTS:

Any request, petition, complaint or claim (PQR, for its acronym in Spanish) submitted to **CONTACTO ESTRATÉGICO OUTSOURCING CONTABLE S.A.S.** by any owner or his/her successors with regarding the handling and treatment given to their information, shall be resolved in accordance with the law related to the right to habeas data and shall be processed under the following rules:

a. The request or claim shall be made in writing or any other means set forth in this policy for that purpose, addressed to **CONTACTO ESTRATÉGICO OUTSOURCING CONTABLE S.A.S.**, providing the identification of the owner, the description of the facts that give rise to the claim, the address or means through which they want to receive their answer, and, if applicable, including any supporting documents they wish to be acknowledged. If the submission is incomplete, the company will contact the interested party for them to correct the flaws within five (5) days following receipt of the complaint. If two months have elapsed from the date of the request and the applicant has failed to submit the required information, it will be understood that he or she has withdrawn the claim or request.

b. Once the complete request or claim has been received, **CONTACTO ESTRATÉGICO OUTSOURCING CONTABLE S.A.S.** shall include in the individual record, within not more than two (2) business days, a caption reading "Claim in process", and the nature thereof. Such information shall be maintained until a decision about the claim is made.

c. The applicant will receive a reply from **CONTACTO ESTRATÉGICO OUTSOURCING CONTABLE S.A.S.** within ten (10) business days from the date on which the application has been effectively acknowledged and is complete.

d. When it is not possible to reply to the request within said time period, the interested party shall be informed, stating the reasons for the delay and indicating the date on which his or her request will be addressed, date which in no case may exceed five (5) business days following the expiration of the first deadline.

B. QUERIES:

The Policy for the handling of personal information by **CONTACTO ESTRATÉGICO OUTSOURCING CONTABLE S.A.S.**, and the basic rights data owners have in relation thereto, may be subject to requests for inquiry by means of a petition addressed to the following street address: Calle 98 # 21-50 Office 502, Bogotá D.C., by calling (57) 601 7043450, or writing to the following email address: info@con-tacto.co.

- In writing, received at the following address: Calle 98 # 21-50 Office 502, Bogotá D.C.
- In writing, by sending an e-mail to the following address: info@con-tacto.co
- If it is not possible for the company to address the query within the aforesaid ten (10) days, the corresponding area must inform the interested party of the reasons for the delay and state the date on which it will be addressed, date which in no case may exceed five (5) business days following the expiration of the first deadline.

C. DATA CONTROLLER:

CONTACTO ESTRATÉGICO OUTSOURCING CONTABLE S.A.S. is the responsible party in charge of the processing, and through this policy provides its identification data:

Company Name	CONTACTO ESTRATÉGICO OUTSOURCING CONTABLE S.A.S.
NIT (TAX ID #)	830.505.485 - 8
Place of business	Calle 98 # 21 - 50, Office 502, Bogotá D.C.

Person or area responsible for dealing with petitions, queries, and claims:	The area in charge of receiving and channeling all requests and concerns is the Client Service office located at Calle 98 # 21 - 50, Office 502 Bogotá D.C., or by calling (57) 601 7043450
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12. Personal data processing and IT security policy

It is essential and a priority for **CONTACTO ESTRATÉGICO OUTSOURCING CONTABLE S.A.S.** to adopt the technical, legal, human and administrative measures that may be necessary to ensure the processing of personal data of all interested parties, as well as the security of personal data by protecting its confidentiality, integrity, use, unauthorized and/or fraudulent access. Likewise, it hereby informs that it has implemented mandatory compliance internal security protocols for all personnel with access to personal data and information systems. **CONTACTO ESTRATÉGICO OUTSOURCING CONTABLE S.A.S.** guarantees the confidentiality, freedom, security, veracity, transparency, access, and restricted circulation of data.

13. Domestic or international transfer of personal data

CONTACTO ESTRATÉGICO OUTSOURCING CONTABLE S.A.S. may transfer data to other Data Controllers whenever authorized to do so by the data Owner, by law, or by an administrative or judicial order.

14. International and national transmissions to data processors

CONTACTO ESTRATÉGICO OUTSOURCING CONTABLE S.A.S. may send or transmit data to one or more Processors located inside or outside the territory of Colombia in the following cases:

- When it has the Owner's Authorization.
- When, without the Authorization, there is a data transmission contract between the Data Controller and the Data Processor.

15. Video surveillance

CONTACTO ESTRATÉGICO OUTSOURCING CONTABLE S.A.S. may use various means of video surveillance installed at different internal and external sites of its facilities or offices. Hence, **CONTACTO ESTRATÉGICO OUTSOURCING CONTABLE S.A.S.** shall inform about the existence of these mechanisms, when installed, by posting video surveillance notices on visible places. Information collected will be used for security purposes of people, property, and facilities. This information may be used as evidence in any sort of process before any kind of authority and organization.