

Privacy Policy

In accordance to Law 1581 of 2012, Decree 1377 of 2013 and other complementary norms regarding data protection, DENTONS CARDENAS & CARDENAS ABOGADOS LTDA and DENTONS CARDENAS & CARDENAS ABOGADOS PROPIEDAD INTELECTUAL LTDA (hereinafter referred to as “DENTONS CARDENAS & CARDENAS” or the “firm”) present their privacy policy, which contains, among others, the scope and purpose of the data processing that DENTONS CARDENAS & CARDENAS will perform in its daily operations as well as the procedures and mechanisms through which any data subject may enforce its habeas data rights.

1. Definitions

- a. **Processing:** Any operation or set of operations on personal data, such as collection, storage, use, circulation or suppression.
- b. **Personal data:** Any information linked to or that may be associated with one or more specific or determinable natural persons.
- c. **Data subjects:** Is the natural person whose personal data is subject to processing.
- d. **Authorization:** Is the prior, express and informed consent from the data subjects for the processing of their personal data.
- e. **Habeas data rights:** All data subjects have the right to access, update, amend and require the suppression of their personal data. This right may be exercised against partial, inaccurate, incomplete, fractioned, error-inducing data, or data whose processing is expressly prohibited or has not been authorized.
- f. **Database:** Organized set of personal data to be subject of processing.
- g. **Sensitive personal data:** Is any information affecting the privacy of the data subject or where the undue use thereof may generate discrimination, such as those disclosing the racial or ethnic origin, political orientation, religious or philosophical beliefs, membership of trade unions, social organizations, of human rights or promoting the interests of any political party or ensuring the rights and guarantees of opposition political parties, as well as data relating to health, sexual orientation and biometric data.
- h. **Special Data:** Refers to the processing of minors data and/or sensitive data.
- i. **Data controller:** Natural or legal person, public or private, that by itself or in association with others, decides on the database and/or the data processing. DENTONS CARDENAS & CARDENAS generally acts as data controller over its databases.

- j. **Data processor:** Natural or legal person, public or private, that by itself or in association with others, performs the data processing on behalf of the data controller. On many occasions and at the request of its clients, DENTONS CARDENAS & CARDENAS may act as a data processor.
- k. **Transmission:** Is the sending of personal information to a natural or legal person, who acting as a data processor, will process the data on behalf of a data controller. A data transmission can be national or international.
- l. **Transfer:** Is the sending of personal information to a natural or legal person, who acting as a data controller will decide autonomously on the purposes and treatment of personal information. A data transfer can be national or international.

2. Principles for data processing

- a. **Principle of legality with regard to the data processing:** The data processing is a regulated activity that must be subject to what is established in Colombian law.
- b. **Principle of purpose:** The processing must arise from a legitimate purpose in accordance with Colombian law, and must be informed to the data subject.
- c. **Principle of freedom:** The data processing may only be exercised 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 releasing consent.
- d. **Principle of veracity or quality:** The information subject to processing must be truthful, complete, accurate, up-to-date, verifiable and understandable. Processing of partial, incomplete, fractionated or error-inducing data is prohibited.
- e. **Principle of transparency:** In the data processing, the data controller and data processor must guarantee the data subjects' right to obtain information regarding the existence of data related to them, at any time and without any restrictions.
- f. **Principle of access and restricted circulation:** The processing is subject to the limits derived from the nature of the personal data and the provisions of Colombian law.
- g. **Principle of safety:** The information subject to processing by a data controller or a data processor, must be handled with the necessary technical, human and administrative measures in order to provide security and prevent adulteration, loss, unauthorized or fraudulent review, use of or access to it.
- h. **Principle of confidentiality:** All persons involved in the processing of personal data are required to ensure confidentiality over the information, even after the end of any of the tasks included in the processing.

3. Purpose and scope of the data processing

The data processing that DENTONS CARDENAS & CARDENAS will perform as a data controller, will be limited to the purposes established as follows. DENTONS CARDENAS & CARDENAS will ensure that the data processing performed by third parties acting as data processors is governed by this privacy policy.

- a. Process information that is essential to the development of its social purpose.
- b. Provide services effectively, as well as inform data subjects about issues of their interest.
- c. Inform and update clients on current topics related to their markets and the development of their social purpose.
- d. Perform administrative management tasks related to the services that DENTONS CARDENAS & CARDENAS provide.
- e. Contact and hire suppliers that DENTONS CARDENAS & CARDENAS may require for the appropriate functioning of the firm.
- f. Prepare accounting and/or statistics records.
- g. Submit reports to supervisory authorities.
- h. Adopt measures tending towards the prevention of unlawful activities, such as asset laundering and/or terrorism financing.
- i. Execute commercial operations such as sales, incorporations, mergers, reorganizations, joint ventures, etc.
- j. Carry out commercial activities such as: (i) marketing and commercialization of our products and services; (ii) measurement of the degree of satisfaction of clients; (iii) implementation of surveys and/or loyalty campaigns; (iv) invitations to events, conferences and/or workshops developed by DENTONS CARDENAS & CARDENAS; (v) assessments on the use of the webpage; (vii) development of commercial strategies jointly with partners and/or other firms belonging to Dentons.
- k. Process requests, consultations, complaints and claims.
- l. Offer personalized contents.
- m. Improve the contents and surfing of the webpage as well as to ensure the fulfillment of its terms and conditions.
- n. Other legitimate purposes under Colombian law.

In accordance with the purposes described above, DENTONS CARDENAS & CARDENAS can:

- a. Access, store and process all the personal information provided by the data subjects in one or several databases, in the format it deems most convenient.
- b. Verify, corroborate, check, validate, investigate or compare the information provided by the data subjects with any information that is lawfully available.
- c. Access, consult, compare and assess the personal information that is stored in the databases of any credit risk registry, and/or financial, legal or security registries, lawfully established, of public or private

nature, domestic or foreign.

- d. If DENTONS CARDENAS & CARDENAS is not in the capacity of performing the data processing on its own, it may transfer/transmit the data so that it is treated by a third party, who acting as a data processor, must guarantee adequate levels of confidentiality and security regarding the personal information.

4. **Sensitive data**

DENTONS CARDENAS & CARDENAS avoids the processing of sensitive data. However, if the firm requires data of such category, it will be processed in accordance with the principles pointed out in this policy and the law, safeguarding the confidentiality that the right to privacy imposes on the firm. Data subjects are not compelled to provide sensitive data. Nevertheless, there can be formalities and procedures for which the processing of such data is required.

5. **Exchange, transfer and transmission of personal data**

DENTONS CARDENAS & CARDENAS may transfer and transmit the personal data to subsidiary companies, branch offices or firms affiliated to DENTONS worldwide, or to companies or natural persons in Colombia or abroad in which DENTONS CARDENAS & CARDENAS trusts for the data processing.

Likewise, DENTONS CARDENAS & CARDENAS may disclose personal data when a competent authority, in the performance of their official duties, lawfully demands it.

6. **Security of the information**

Currently, the personal data is protected by reasonable IT security measures that adjust to the industry standards and protect the system against hackers. DENTONS CARDENAS & CARDENAS has a monitoring and support service in the event of malicious and intrusive virus / malware.

7. **Rights of the data subjects**

Data subjects are entitled to access, update, rectify and require the suppression of the personal data through the procedures established in Colombian law.

DENTONS CARDENAS & CARDENAS is the data controller of its databases.

In the event of doubts, consultations or claims regarding the data processing, please send your request to the email habeasdata.colombia@dentons.com

. You may also send your request to the following address: Carrera 7 No. 71-52, Torre B, Piso 9 in Bogotá, Colombia.

8. **Procedures**

Consultations

Data subjects are entitled to access the personal data that is kept in any database of the firm. Regarding this matter, please bear in mind:

- a. If you wish to file a consultation, you must send your message to the email **habeasdata.colombia@dentons.com**. You must attach copy of ID. If you are not the data subject, please mention in which capacity you are acting and attach the document that authorizes you to carry out the consultation.
- b. You may also send your consultation, bearing in mind the requirements pointed out above, to the following address: Carrera 7 No. 71-52, Torre B, Piso 9 in Bogotá, Colombia.
- c. DENTONS CARDENAS & CARDENAS will have a time period of ten (10) business days to respond to your consultation. If it is not possible to answer your consultation within such period, the firm will inform you the reasons for the delay and will respond in a time period, which in no event may exceed five (5) business days subsequent to the first term.

Claims

Data subjects are entitled to update, rectify and/or require the suppression of the personal data that is kept in any database of the firm. Regarding this matter, please bear in mind:

- a. If you wish to file a claim, you must send your message to the email **habeasdata.colombia@dentons.com**. You must attach copy of ID. If you are not the data subject, please mention in which capacity you are acting and attach the document that authorizes you to carry out the consultation.
- b. You may also send your claim, bearing in mind the requirements pointed out above, to the following address: Carrera 7 No. 71-52, Torre B, Piso 9 in Bogotá, Colombia.
- c. DENTONS CARDENAS & CARDENAS will have a time period of fifteen (15) business days to process your request. If it is not possible to answer your claim within such period, the firm will inform you the reasons for the delay and will respond in a time period, which in no event may exceed eight (8) business days subsequent to the first term.
- d. If the claim is incomplete, we will ask you to complete it within the next five (5) days. If DENTONS CARDENAS & CARDENAS is not able to meet your claim, we will inform to whom it corresponds in a maximum time period of two (2) business days and we will inform you about said situation.

9. Cookies and similar technologies

DENTONS CARDENAS & CARDENAS may use Cookies and similar technologies to offer and optimize its web services and compiled

information. Cookies are small information files sent through a website, which are stored in the navigator of the user.

DENTONS CARDENAS & CARDENAS may use Cookies to guarantee the proper operation of its web services and webpages, store its preferences, learn about its surfing experience, compile information on the offered services, among other things. Users have tools to control Cookies and other similar technologies, through their web browsers and/or through third party-services.

10. Term

This PRIVACY POLICY will become effective as of June 1, 2017. The databases of DENTONS CARDENAS & CARDENAS will be kept for the time needed to guarantee the fulfillment of its corporate purpose, those ordered by the law, and that stipulated by other norms as regards to document withholding.

11. Changes in the Privacy Policy

Any fundamental change in the processing policies will be timely informed through publications in DENTONS CARDENAS & CARDENAS webpage

12. Contact Information

DENTONS CARDENAS & CARDENAS is located in the city of Bogotá D.C., Carrera 7 # 71-52, Torre B, Piso 9, telephone (57) 1 3137800.