

# PERSONAL DATA PROCESSING POLICY

## GENERAL DATA OF CASALUKER S.A. AS RESPONSIBLE FOR THE PROCESSING OF PERSONAL DATA

GENERAL INFORMATION OF THE RESPONSIBLE IN THE MANAGEMENT OF PERSONAL DATA PROTECTION
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### JUSTIFICATION

This Personal Data Processing Policy of CASALUKER S.A. its purpose is to protect the constitutional right of all persons to know, update and rectify the information that has been collected about them in the databases or files owned by CASALUKER S.A., or whose treatment has been entrusted to CASALUKER S.A., in development and fulfillment of its corporate purpose, as well as the other rights, freedoms and constitutional guarantees referred to in articles 15 (right to privacy) and 20 (right to information) of the Political Constitution of Colombia.

In this Personal Data Processing Policy of CASALUKER S.A. are presented the legal and corporate guidelines under which CASALUKER S.A. performs the processing of personal data, the purpose, the rights of the owner, as well as the internal and external procedures that exist for the exercise of such rights towards CASALUKER S.A.

CASALUKER S.A. means by data protection all measures that are taken, physically, technically and legally, to ensure that the information of the natural persons owners registered in the CASALUKER S.A. databases is sure of any attack or attempt to access it by unauthorized persons, as well as its use and conservation is adequate to the purpose established for the collection of personal data.

### PART 1. GENERAL.

#### ARTICLE 1. LEGAL FRAMEWORK.

This Personal Data Processing Policy of CASALUKER S.A. has been created in the development of the provisions contained in the articles 15 and 20 of the National Constitution of Colombia, the Law 1581 of 2012 "Law of Protection of Personal Data (Habeas Data)", its Regulatory Decree 1377 of 2013 of June 27, 2013 of the Ministry of Commerce, Industry and Tourism, the Single Regulatory Decree 1074 of 2015 and its other concordant and complementary regulations. Its provisions must be understood in harmony with these norms and interpreted systematically with them.

To the extent that if there are significant legal changes that modify the aforementioned regulations, the Personal Data Processing Policy of CASALUKER S.A. will be adjusted according to these changes.

## **ARTICLE 2. APPLICATION.**

This Personal Data Processing Policy is addressed to all who have or have had any relationship with CASALUKER S.A.: namely, without this statement being exhaustive, both active and inactive customers, suppliers, workers, former workers, or any third party whose Personal data is included in the databases of CASALUKER S.A., and its related companies, strategic allies or companies that CASALUKER S.A., contracts for the collection of personal data in its name.

The scope of application of this Personal Data Processing Policy in accordance with Law 1581 of 2012, will be the data of natural persons registered in all databases owned by CASALUKER S.A., or whose treatment has been entrusted to it.

This policy will apply to the processing of personal data carried out in Colombian territory or when CASALUKER S.A., in its capacity as responsible or in charge of data processing, will cease to be domiciled in the national territory, but nevertheless, Colombian law is applicable under international norms and treaties.

The personal data protection regime established in this Policy shall not apply to:

- a) The databases or files maintained in an exclusively personal or domestic environment. When these databases or files are to be supplied to third parties, the owner must be informed in advance and request authorization. In this case, those responsible for databases and files will be subject to the provisions contained in the Habeas Data law.
- b) The databases and archives whose purpose is national security and defense, as well as the prevention, detection, monitoring and control of money laundering and terrorist financing.
- c) The databases that are intended to contain intelligence and counterintelligence information.
- d) The databases and archives of journalistic information and other editorial content.
- e) The databases and files regulated by Law 1266 of 2008.
- f) The databases and archives regulated by Law 79 of 1993.

## **ARTICLE 3. PERMANENCE.**

The policies and procedures set forth in this document apply to the databases that it currently has and those that towards the future are compiled by CASALUKER S.A., which will keep the records of all the owners indefinitely in order to maintain contact with them. The data in the file will be deleted at the request of the owner of the respective information.

## **ARTICLE 4. OBJECT.**

The purpose of the creation of this Policy is to fully comply with the provisions of paragraph k) of article 17 of Law 1581 of 2012 and article 13 of Decree 1377 of 2013, which refers to the adoption of a manual with internal policies and procedures to ensure adequate claims attention and adequate information processing. The provisions of the Policy apply as pertinent to any personal information collection activity carried out by CASALUKER S.A., regardless of the purpose of such collection.

## **ARTICLE 5. DEFINITIONS.**

- **AUTHORIZATION:** Prior, express and informed consent of the owner to carry out the processing of personal data.
- **DATABASE:** Organized set of personal data that is subject to processing.
- **PERSONAL DATA:** Any information linked or that may be associated with one or more specific or determinable natural persons.
- **SENSITIVE DATA:** Those that affect the privacy of the owner or whose improper use can generate discrimination.
- **PRIVACY NOTICE:** Verbal or written communication generated by the person in charge, addressed to the owner for the processing of their personal data, by means of which they are informed about the existence of the Personal Data Processing Policy that will be applicable, the form to access it and the

purposes of the treatment that is intended to give personal data.

- **PUBLIC DATA:** It is the data that is not semi-private, private or sensitive. It is considered as such, among others, data relating to the marital status of people, their profession or trade and their status as merchant or public servant.
- **BIOMETRIC DATA:** Are those physical, biological or behavioral traits of an individual that identify him/her as unique to the rest of the population as fingerprints, DNA analysis.
- **WORKER:** Natural person who under an employment contract undertakes to provide a personal service to another natural or legal person, under the continued dependence or subordination of the second and through remuneration.
- **EXTRABAJADOR:** Natural person who was linked to CASALUKER S.A.
- **VISITOR:** Person(s) who are in a place for a duration of less than 8 hours without exercising an activity that is remunerated in the visited place.
- **MANAGER OF THE TREATMENT:** Natural or legal person, public or private, that by itself or in association with others, performs the processing of personal data on behalf of the person responsible for the treatment.
- **RESPONSIBLE FOR THE TREATMENT:** Natural or legal person, public or private, that by itself or in association with others, decides on the basis of the data and/or the treatment of the data.
- **TREATMENT POLICY:** Refers to this document, as a Personal Data Processing Policy applied by CASALUKER S.A., in accordance with the guidelines of the legislation in force in the matter.
- **SUPPLIER:** Any natural or legal person that provides a good or provides a service to CASALUKER S.A., by virtue of a commercial and/or business and/or contractual relationship.
- **HOLDER:** Natural person whose personal data is subject to processing;
- **TREATMENT:** Any operation or set of operations on personal data, such as collection, storage, use, circulation or deletion.
- **TRANSFER:** The data transfer takes place when the person in charge of processing of personal data, located in Colombia, sends the information or personal data to a recipient, who in turn is responsible for the processing and is within or out of the country.
- **TRANSMISSION:** Treatment of personal data that implies the communication of the same within or outside the territory of the Republic of Colombia when it is intended to carry out a treatment by the person in charge of the person responsible.

## **ARTICLE 6. PRINCIPLES.**

The principles mentioned below regulate the treatment of the information developed by CASALUKER S.A., promptly against the storage, use and processing of personal data:

- a. COLLABORATION WITH THE AUTHORITY:** CASALUKER S.A. cooperate with the competent authorities on data protection, to ensure compliance with the laws.
- b. LEGALITY PRINCIPLE:** The Treatment of personal data is a regulated activity that must be subject to the provisions of Law 1581 of 2012 in Decree 1377 of 2013 and in the other provisions that develop them.
- c. PURPOSE:** The use, storage and treatment must have a specific and informed purpose to the holder prior to delivery.
- d. FREEDOM:** The treatment can only be carried out in accordance with the prior, express and informed consent of the holder in the case of new participants.
- e. TRANSPARENCIA:** CASALUKER S.A. will make available to the owners all the appropriate mechanisms in order to guarantee information about the personal data that are recorded in the databases, at any time and without restrictions.
- f. TRUTH:** At all times the information contained in the databases will be truthful and unambiguous, complete, accurate and updated. Incomplete or fractional data that could lead to an error will not be used. The holder may request at any time the correction, update or deletion or blocking of the information.
- g. PRIVACY:** Personal data will not be available in any means of public or mass disclosure in respect of the right to privacy. CASALUKER S.A. will not sell or share the information outside the limits and

conditions provided for in this regulation.

**h. RESTRICTED ACCESS AND CIRCULATION:** The treatment is subject to the limits derived from the nature of personal data, the provisions of the law and the Constitution. In this sense, the treatment may only be done by persons authorized by the holder and/or by the persons provided by law. Personal data, except public information, may not be available on the Internet or other means of disclosure or mass communication, unless access is technically controllable to provide restricted knowledge only to holders or third parties authorized under the law.

**i. SECURITY:** CASALUKER S.A. will deploy all means and implement all the useful and relevant tools for securing the records contained in the databases including confidentiality contracts and in general any suitable mechanism to avoid any leakage or erroneous treatment of the information.

**j. CONFIDENTIALITY:** CASALUKER S.A. will guarantee that all the people involved in the treatment of the information will be subject to control and supervision, including, after the end of their relationship with the tasks that comprise said treatment.

## **ARTICLE 7. TREATMENT TO WHICH THE DATA AND PURPOSE OF THE SAME WILL BE SUBMITTED.**

In the treatment of the data contained in the following databases, CASALUKER S.A., acts as both responsible, since it collects the information and makes decisions about the treatment of the data, as well as in charge, to the extent in which it performs the data processing.

### **1. DATABASE OF WORKERS, PRACTICEERS, LEARNERS AND PENSIONED.**

**• Description:**

This database corresponds to the information that is collected about the workers and students in practice, apprentices, mission workers and pensioners that CASALUKER S.A. has.

**• Purpose:**

The aforementioned data is only collected for the purpose of (i) Complying with the obligations arising from the employment contract; (ii) Identify, as well as control the workforce of active and inactive mission workers; (iii) Make links to the social security system and family compensation funds; (vi) Make reports to government entities; (v) Pay taxes; (vi) Communication in case of absence, distribution of information; (vii) Aid or benefits; (viii) Internal security; and (ix) Carry out the general purposes established in article 8 of this policy.

Sensitive data such as fingerprint and photo are used only for respective identification and only authorized personal access. Likewise, the blood group as health-related information is only used in emergencies, or for reporting to the entities of the health social security system.

### **2. SHAREHOLDERS DATABASE.**

**• Description:**

The personal data and information of the natural persons that have the status of shareholder of CASALUKER S.A., will be considered as reserved information, since it is registered in the trade books and has the nature of reserve by legal provision. However, the information will be disclosed in the cases established by the legal provisions that regulate the matter.

**• Purpose:**

The aforementioned data is only collected for the purpose of (i) Allowing the exercise of the duties and rights derived from the quality of shareholder; (ii) Sending invitations to events scheduled by CASALUKER S.A.; (iii) Issuance of certifications related to the data subject's relationship with the company; (iv) The others established in the authorizations granted by the shareholders themselves; and (v) Carry out the general purposes established in article 8 of this policy.

### **3. SUPPLIER DATABASE:**

**• Description:**

This database collects information from strategic suppliers and sporadic suppliers, natural and legal persons, who offer, provide, goods or services to CASALUKER S.A.

- **Purpose:**

The data is collected in order to: (i) The process of the linkage request as a provider; (ii) The execution and fulfillment of the purchase orders or contracts that are concluded. (iii) Fraud control and prevention; (iv) Control compliance with requirements to access the General Comprehensive Social Security System; (v) The prevention and control of money laundering and terrorist financing; (vi) Consult and send information to credit risk centers; (vii) Conduct surveys on satisfaction of the good supplied or the services provided by the supplier to CASALUKER S.A., and (viii) Carry out the general purposes established in article 8 of this manual.

#### **4. SUPPLIERS OF RAW MATERIAL DATABASE (COCOA AND COFFEE):**

- **Description:**

This database collects information from cocoa and coffee raw material suppliers for CASALUKER S.A.

- **Purpose:**

The data is collected for the purpose of (i) The process of linking request as a provider; (ii) The execution and fulfillment of the contracts concluded; (iii) Fraud control and prevention; (iv) Control compliance with requirements to access the General Comprehensive Social Security System; (v) The prevention and control of money laundering and terrorist financing; (vi) Consult and send information to credit risk centers; (vii) Conduct surveys on satisfaction of the good supplied or the services provided by the supplier to CASALUKER S.A. and (viii) Perform the general purposes set forth in article 8 of this policy.

#### **5. APPLICANT DATABASE:**

- **Description:**

This database collects the information of people who want to apply to positions at CASALUKER S.A.

- **Purpose:**

The data is collected in order to: (i) Have the indicated personnel to make an adequate selection of the personnel that wants to aspire to the positions in CASALUKER S.A. ; (ii) Have the contact details of the applicants; (iii) Manage the contact details of the applicants; (iv) Compliance with the selection process; (v) Work history analysis; (vi) Procedure of linking as a worker of CASALUKER S.A. ; (vii) Fraud control and prevention; (viii) Control the fulfillment of requirements to access the General Social Security System if selected; (ix) The prevention and control of money laundering and terrorist financing; (x) Consult and send information to credit risk centers; and (xi) Control business security in the evaluation of people and/or applicants who may be hired by CASALUKER S.A. and (xii) Carry out the general purposes established in article 8 of this policy.

#### **6. PAYROLL DATABASE - WORKERS, PRACTICEERS, LEARNERS AND PENSIONERS - PHYSIC.**

- **Description:**

This database corresponds to the information collected about workers, students in practice, apprentices and pensioners.

- **Purpose:**

The aforementioned data is only collected for the purpose of (i) Complying with the obligations arising from the employment contract; (ii) Identify, as well as control the workforce of active and inactive mission workers; (iii) Make links to the social security system and family compensation funds; (vi) Make reports to government entities; (v) Pay taxes; (vi) Communication in case of absence, distribution of information; (vii) Conventional benefits; (viii) Internal security; and (ix) Carry out the general purposes established in article 8 of this policy.

Sensitive data such as fingerprint and photo are used only for the respective identification and only

authorized personal access. Likewise, the blood group as health-related information is only used in emergencies, or for reporting to the entities of the health social security system.

#### **7. DATABASE OF RETIRED PERSONNEL:**

**• Description:**

This database corresponds to the information that is collected about former workers, trainees, apprentices, mission workers, and all those personnel retired from CASALUKER S.A.

**• Purpose:**

The aforementioned data is only collected for the purpose of (i) Having a list of personnel and positions that have worked in CASALUKER S.A., in case there may be a possible labor demand; (iii) Administration and relationship of personnel who have held positions in CASALUKER S.A.; and (iv) Carry out the general purposes established in article 8 of this policy.

#### **8. SECURITY DATABASE - WORKERS WHO OCCUPY CRITICAL JOBS:**

**• Description:**

This database corresponds to the information that is collected about workers, students in practice, apprentices, mission workers, and all those personnel who occupy critical jobs in CASALUKER S.A.

**• Purpose:**

The aforementioned data is only collected for the purpose of (i) Complying with the regulations of the BASC standards; (ii) Comply with the regulations of the OAS standards; (iii) Perform safety studies periodically and / or annually to said critical positions (v) Offer through safety studies the necessary tools for compliance with occupational safety; (vi) Comply with SARLAFT regulations; (vii) Comply with all regulations regarding protection, prevention of crimes associated with money laundering and terrorist financing; and (viii) Perform the general purposes set forth in article 8 of this policy.

#### **9. SECURITY DATABASE - CLIENT VALIDATION:**

**• Description:**

This database corresponds to the information taken from the client which aims to minimize the risk of CASALUKER S.A. at the time of maintaining a commercial relationship with a client of which a security study is carried out that aims to comply with the safety regulations to avoid incurring money laundering and terrorist financing.

**• Purpose:**

The aforementioned data is only collected for the purpose of (i) Validating the information in compliance with the legal requirement of customer knowledge applicable to CASALUKER S.A.; (ii) Treatment of personal data protected by the legal system; (iii) Treatment and protection of contact data (telephone, physical and email addresses); (iv) Validate the client's tax information; (v) The prevention and control of money laundering and terrorist financing; and (vi) Perform the general purposes established in article 8 of this policy.

#### **10. SECURITY DATABASE - SUPPLIER VALIDATION:**

**• Description:**

This database corresponds to the information taken from the supplier which aims to minimize the risk of CASALUKER S.A. at the time of maintaining a commercial and/or business and/or contractual relationship with a supplier to avoid incurring money laundering and terrorist financing in accordance with security regulations.

**• Purpose:**

The aforementioned data is only collected for the purpose of (i) Validating the information in compliance with the legal requirement of knowledge of the supplier applicable to CASALUKER S.A.; (ii) Treatment of personal data protected by the legal system; (iii) Treatment and protection of contact data (telephone,

physical and email addresses); (iv) Validate the tax information of the provider; (v) The prevention and control of money laundering and terrorist financing; and (vi) Perform the general purposes established in article 8 of this policy.

#### **11. SECURITY DATABASE - WORKERS ACCESS CONTROL:**

**• Description:**

This database is made to have access control for the employees of CASALUKER S.A.

**• Purpose:**

The data is only collected in order to (i) Validate the entry of workers to CASALUKER S.A.; (ii) Identify the worker entering the company; (iii) Validate the different areas to which the worker enters for safety reasons; and (iv) Carry out the general purposes established in article 8 of this policy.

#### **12. SECURITY DATA BASE - VISITOR ACCESS CONTROL:**

**• Description:**

This database is made to have full identification and knowledge of visitors entering CASALUKER S.A.

**• Purpose:**

The data is only collected for the purpose of (i) Validating the entrance of visitors to CASALUKER S.A.; (ii) Identify the personal data of the visitor who enters the company's facilities; (iii) Offer security to CASALUKER S.A. regarding the visitors it receives; (iv) Minimize the risk of intrusion to the company; and (iv) Carry out the general purposes established in article 8 of this policy.

Sensitive data such as the photo of the visitors are used for their physical identification and thus grant greater security to both CASALUKER S.A. like its workers in front of the visitors it receives daily.

#### **13. CUSTOMER DATA BASE:**

**• Description:**

This database collects the information of permanent clients and sporadic clients, natural and legal persons, who acquire the goods or products offered by CASALUKER S.A.

**• Purpose:**

The data is only collected in order to (i) Validate the information in compliance with the legal requirement of customer knowledge applicable to CASALUKER S.A.; (ii) Advance collection and portfolio recovery actions; (iii) Treatment of personal data protected by the legal system; (iv) Treatment and protection of contact data (telephone, physical, and email addresses); (v) Evaluate and identify the credit quotas that the client has; (vi) Identify the financial information that the client has for payments; (vii) Validate the client's tax information; (viii) The prevention and control of money laundering and terrorist financing; (ix) Conduct surveys on satisfaction of the goods or products offered by CASALUKER S.A.; and (x) Carry out the general purposes established in article 8 of this policy.

#### **14. MARKETING DATA BASE:**

**• Description:**

This database is collected in order to receive market information, as well as information on the distinctive signs, products and services provided by CASALUKER S.A., in the markets where it participates.

**• Purpose:**

The data is only collected for the purpose of (i) Delivering merchandising information; (ii) Provide information on the distinctive signs of CASALUKER S.A. and/or any distinctive signs that CASALUKER S.A. handles; (iii) Report general changes of the distinctive signs of CASALUKER S.A.; (iv) Give information on current or past promotional activities; (v) Perform marketing strategies such as direct mail, mailing, promotions, market research and / or advertising; (vi) Verify the delivery of prizes for promotional activities carried out by CASALUKER S.A. or by a third party at the service of CASALUKER

S.A.; (vii) Award prizes for promotional activities carried out by CASALUKER S.A. or a third party at the service of CASALUKER S.A.; and (viii) Perform the general purposes set forth in article 8 of this policy.

#### **ARTICLE 8. USES, PURPOSES OF THE TREATMENT AND GENERAL ASPECTS.**

CASALUKER S.A., as a company that respects the privacy of individuals, recognizes that the holder of personal data has the right to have adequate elements that guarantee it, taking into account in any case their responsibilities, rights and obligations. By virtue of the relationship that has been established between the owner of the personal data and CASALUKER S.A., it is important that the owner knows that CASALUKER S.A. collects, registers, stores, uses their personal data, for the purposes that were requested or by requirements of public entities.

The personal data of the holders are used by CASALUKER S.A., to: (i) Execute the activities of CASALUKER S.A., to fulfill its corporate purpose, all of which will be done based on the purpose of the database in which they rest the personal data of the holders; (ii) Develop business relationships with third parties; (iii) Offer the products, services and benefits that seek to meet the needs of the holders, or the products and services of CASALUKER S.A., which can be done by physical means or through emails and/or mobile terminals; (iv) Send the information to government entities by express request or by legal requirement; (v) Consult information in the lists for the control of money laundering managed by any national or foreign authority, such as the Office of Foreign Assets Control (OFAC) of the Department of the Treasury of the United States of America or in bases of data or in lists of legal or natural persons that appear as linked in some way or another with resources from drug trafficking, money laundering or criminal activities, information centers, Comptroller, National Police, DIJIN in order to preserve the trust and transparency between the owner of the data and CASALUKER S.A.; (vi) Support external and internal audit processes; (vii) Record the information of workers, former workers, suppliers, customers (active and inactive) in the databases of CASALUKER S.A., for the sending of contractual, commercial and mandatory information to any place; (viii) For verification of references of workers, former workers, suppliers, customers (active and inactive) in the databases; (ix) Regarding the collection and processing of data carried out through automated mechanisms in order to generate visitor activity records. CASALUKER S.A. use this information for the preparation of reports that meet the stated objectives. In no case may carry out operations that involve associating said information with any identified or identifiable user; (x) Personal data will be used by CASALUKER S.A. for the purposes indicated herein, therefore, CASALUKER S.A., will not sell, license, transmit or disclose personal data, unless: (a) The holder expressly authorizes it to do so; (b) Information related to a merger, consolidation, acquisition, divestment or other restructuring process of CASALUKER S.A.; (c) Be allowed by law.

For the internal management of the data, these may be known by the authorized staff of CASALUKER S.A., which includes the General Assembly of Shareholders, the Board of Directors, the Statutory Auditor, the Management and the Legal Headquarters.

CASALUKER S.A, may subcontract to third parties for the processing of certain functions or information. When such third parties occur, they will be obliged to protect personal data in the terms required by law and in their capacity as managers of the databases of CASALUKER S.A.

In the case of transmission of personal data, CASALUKER S.A., will subscribe the transmission contract that takes place under the terms of the regulations in force.

Likewise, CASALUKER S.A., may transfer or transmit (as appropriate), keeping the appropriate security measures, your personal data to other entities in Colombia or abroad for the provision of a better service, in accordance with the authorizations that have been granted. by the holders of personal data.

Once the need for the processing of personal data ceases, they will be blocked from the databases of CASALUKER S.A., or deleted at the express request of the owner, in safe terms.



## **ARTICLE 9. SENSITIVE DATA.**

The processing of sensitive data is prohibited except when:

- The holder has given explicit authorization to such treatment, except in cases where the granting of such authorization is not required by law.
- The treatment is necessary to safeguard the vital interest of the holder and he/she is physically or legally incapacitated. In these events, legal representatives must grant their authorization.
- The treatment is carried out in the course of legitimate activities and with due guarantees by a foundation, NGO, association or any other body, whose purpose is political, philosophical, religious or trade union, provided they refer exclusively to its members or to people who maintain regular contacts for their purpose. In these events, the data cannot be provided to third parties without the authorization of the holder.
- The treatment refers to data that are necessary for the recognition, exercise or defense of a right in a judicial process.
- The treatment has a historical, statistical or scientific purpose. In this event, measures must be taken to suppress the identity of the holders.

## **PARAGRAPH. Rights of children and adolescents.**

The processing of personal data of children and adolescents is prohibited, except in the case of public data. The areas that due to the nature of their management must perform this type of personal data processing, must apply the principles for the protection of the fundamental rights of this type of personal data holders.

## **ARTICLE 10. RIGHTS OF CHILDREN AND ADOLESCENTS.**

The processing of personal data of children and adolescents is prohibited, except in the case of public data. The areas that due to the nature of their management must carry out this type of personal data, must apply the principles for the protection of the fundamental rights of this type of personal data holders.

## **PART 2. AUTHORIZATIONS.**

### **ARTICLE 11. AUTHORIZATION.**

In accordance with the provisions of Law 1581 of 2012 and its Regulatory Decree 1377 of 2013, as well as the single regulatory Decree 1074 of 2015, the use, collection and storage of personal data by CASALUKER S.A., must have an authorization where the prior, express and informed consent of the Holder is expressed to carry out the processing of their personal data. Against the data collected before June 27, 2013 CASALUKER S.A., has chosen to use the mechanism provided in article 10 of regulatory decree 1377 of 2013.

### **ARTICLE 12. PROOF OF THE AUTHORIZATION.**

CASALUKER S.A. will put into operation all the suitable mechanisms in order to allow the holders to grant their authorization for the processing of personal data.

### **ARTICLE 13. PRIVACY NOTICE.**

CASALUKER S.A., has the privacy notice, which contains the information required by Decree 1377 of 2013, which will be communicated to the holder of personal data through the company's media. To facilitate the disclosure, its content may be included within the authorization.

## **PART 3. RIGHTS AND DUTIES.**

### **ARTICLE 14. RIGHTS OF THE HOLDERS OF THE INFORMATION.**

The holder of the information collected by CASALUKER S.A. will have the following rights: 1) Know, update and rectify personal data. 2) Request proof of authorization granted to carry out personal data processing. 3) Upon request to CASALUKER S.A., know the use that has been given to personal data. 4) Submit complaints to the Superintendence of Industry and Commerce for violations of the provisions of Law 1581 of 2012 and Regulatory Decree 1377 of 2013 issued by the Ministry of Commerce, Industry and Tourism once the procedure referred to in article 16 of Law 1581 of 2012. 5) Revoke the authorization granted to CASALUKER S.A., to stop the processing of the personal data of the holders. 6) Request the deletion of personal data from the databases of CASALUKER S.A. 7) Access personal data that rests in the CASALUKER S.A. database for free.

#### **PART 4. DUTIES OF CASALUKER S.A. REGARDING THE PROCESSING OF PERSONAL DATA.**

##### **ARTICLE 15. DUTIES OF CASALUKER S.A.**

As the responsible for the information CASALUKER S.A., is aware of the importance of observing the policies and protocols aimed at protecting the personal data of the holders, since they are property of the people to whom they refer and only they can decide on the use that will be given to said data. CASALUKER S.A. will make use of the personal data for the purposes expressed by the holder, with respect to the provisions enshrined in the law and in others that deal with the protection of personal data. Therefore, CASALUKER S.A. undertakes to comply fully and permanently with the precepts mentioned below. 1) Guarantee the holder indefinitely and permanently full and effective respect for their rights regarding their personal data. 2) Keep the information under strict security measures in order to prevent loss, query use or access not allowed or fraudulent. 3) To process the queries and claims lodged by the holders of the information in the terms established by article 14 of Law 1581 of 2012 regarding the response time. 4) Allow access to information only to people who, on the occasion of their work as workers of CASALUKER S.A., must have such access. 5) Inform the Superintendence of Industry and Commerce in a timely manner when there are possible violations of the information security protocols or there are risks in the administration of the information provided by the holders. 6) Strictly comply with Law 1581 of 2012 its Regulatory Decree 1377 of 2013 and the single Regulatory Decree 1074 of 2015 and its other concordant regulations, as with all the requirements made by the Superintendence of Industry and Commerce.

#### **PART 5. CONSULTATION AND CLAIM PROCEDURES.**

##### **ARTICLE 16. OBJECTIVE.**

Considering that the holders of the information are assisted by the right to make inquiries or claims about their personal information that rests in the databases of CASALUKER S.A., a procedure has been implemented that involves claims about personal consultations, requests for authorization of information and use of data and attention to requests for correction, authorization or deletion of data.

1) Attention of request: The holder can make the consultation by written, verbal or face-to-face at the venues mentioned in this policy, between 8:00 a.m. and 6:00 p.m. Monday through Friday and Saturday from 9:00 a.m. at 12:00 m. These channels are arranged by CASALUKER S.A. in the way they are included in the privacy notice or in the data section of the data controller.

2) Application requirements: The applications submitted must include at least the following information: Full name, address, telephone number, email and citizenship ID number, subject of the complaint and / or application and claims.

3) Process of the request: All the requests filed by the holders of the information will have a response within a period of less than 10 business days counted from the moment of receipt of the claim.

4) The requests for correction, update or deletion of data will be attended in only one instance, in each of the channels that CASALUKER S.A. has for the exercise of those rights with respect to the data that have been delivered or are being delivered. Therefore, CASALUKER S.A. has provided channels for

the exercise of the rights of the holders as detailed in the privacy notice or in the data section of the person responsible for the treatment of this policy.

## **PART 6. FINAL PART.**

### **ARTICLE 17. SECURITY MEASURES.**

CASALUKER S.A. will adopt the technical, human and administrative measures that are necessary to grant security to the records avoiding their adulteration, loss, consultation, use or unauthorized or fraudulent access. These measures will respond to the minimum requirements made by current legislation and their effectiveness will be periodically evaluated.

### **ARTICLE 18. VALIDITY OF THE POLICY FOR THE TREATMENT OF PERSONAL DATA OF THE HOLDERS.**

This policy is available to the owners of the data.

### **ARTICLE 19. CHANGES IN THE DATA PROCESSING POLICY.**

Any substantial change in the Policy for the Treatment of Personal Data will be communicated in a timely manner to the holders who rest in the databases through mass communication addressed to the contact data sent to CASALUKER S.A. In case of not having the contact of the holders for the communication of the change of the policy, CASALUKER S.A. additionally, will inform through its website [www.casaluker.com](http://www.casaluker.com) or any other efficient mechanism.

### **ARTICLE 20. NATIONAL REGISTRY OF DATABASES.**

The database registration process must be carried out with the Superintendence of Industry and Commerce, in accordance with the definitions of the tool made available by this authority and in accordance with the provisions of Decree 886 of 2014, taking into account It counts, among others, the following aspects:

- a) Registration of current databases: This registration must be made within the year following the initiation of the National Registry of Databases by the Superintendence of Industry and Commerce.
- b) Creation of databases: They must be registered within two (2) calendar months, after their creation.
- c) Update of the information contained in the National Registry of Databases. According to External Circular No. 002 of November 3, 2015, the information contained in the National Registry of Databases must be updated as follows:
  - Within ten (10) business days of each month, from the registration of the database. This in case of substantial changes in the registered information.
  - Annually, between January 2 and March 31, from 2018.
- d) Security incidents: Security incidents must be reported to the Superintendence of Industry and Commerce, through the National Registry of Databases within fifteen (15) business days following the moment they are detected and disclosed to the person or area in charge of serving them.

### **ARTICLE 21. VALIDITY.**

This policy will be effective as of publication. The databases of CASALUKER S.A. will be conserved for the time necessary to guarantee the fulfillment of its corporate purpose, those ordered by law and what other regulations in the matter of document retention.