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	PERSONAL DATA PROTECTION POLICY	VERSION: 04
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## 1. GENERAL

This policy regulates the protection of personal data and establishes the legal guarantees that ALGRANEL S.A. must comply with for the due treatment of such information, in compliance with the provisions of Law 1581 of 2012, Decree 1377 of 2013 and Decree 886 of 2014.

This policy applies to all ALGRANEL S.A. employees, data owners and data controllers, and regulates all the processes of the organization whose development involves the use of personal data.


## 2. DEFINITIONS

- **AUTHORIZATION:** Prior, express and informed consent of the Data Subject to carry out the Processing of personal data.
- **PRIVACY NOTICE:** Verbal or written communication generated by the responsible party, addressed to the Data Subject for the Processing of his/her personal data, by means of which he/she is informed about the existence of the information processing policies that will be applicable, the way to access them and the purposes of the Processing that is intended to be given to the personal data.
- **DATA BASE:** Organized set of personal data that is the object of processing.
- **PRIVATE DATA:** Data that, due to its intimate or reserved nature, is only relevant to the data subject.
- **PUBLIC DATA:** It is the data qualified as such according to the mandates of the Law or the Political Constitution and all those that are not semi-private or private. Public data includes, among others, data related to the marital status of individuals, their profession or trade, and their status as merchants or public servants. By their nature, these may be contained, among others, in public records, public documents, official gazettes and bulletins, and duly executed court rulings that are not subject to confidentiality.
- **SENSITIVE DATA:** Information that affects the privacy of the person or whose improper use may generate discrimination, such as those that reveal racial or ethnic origin, political orientation, religious or philosophical convictions, membership in trade unions, social organizations, human rights organizations or that promote the interests of any political party or that guarantee the rights and guarantees of opposition political parties, as well as data relating to health, sex life and biometric data.
- **PERSON IN CHARGE OF THE PROCESSING:** Natural or legal person, public or private, that by itself or in association with others, carries out the Processing of personal data on behalf of the Data Controller. In case there is no other person carrying out the processing of the data on behalf of the organization, ALGRANEL S.A. will also have the quality of person in charge.
- **PERSON RESPONSIBLE FOR THE TREATMENT:** natural or legal person, public or private, who by himself or in association with others, decides about the data base and/or the Data Treatment. For effects of the present policy, ALGRANEL S.A. will be considered responsible for deciding about, among others, the collection and treatment purposes.
- **DATA CONTROLLER:** The natural person whose data is the object of Processing.
- **PROCESSING:** Any operation or set of operations on personal data such as collection, storage, use, circulation or deletion.

## 3. PRINCIPLES

The following principles will govern the use of personal data in charge of ALGRANEL S.A.:

- A. **LEGALITY:** The processing of personal data in Colombia is a regulated activity, therefore the handling of such data must be carried out within the legal framework established by the competent authorities.
- B. **PURPOSE:** The processing of personal data must obey a legitimate purpose, in accordance with the Constitution and the law, which must be informed to the owner so that he/she may express his/her consent.


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- C. **FREEDOM:** The treatment of personal data in ALGRANEL S.A., will be carried out with the previous, express and informed consent of the holder. The personal data will not be obtained, treated or disclosed without authorization of the holder, except legal or judicial mandate that relieves its consent.
- D. **QUALITY OR TRUTH OF THE DATA:** The information subject to processing must be truthful, complete, verifiable, understandable, accurate and up-to-date.
- E. **TRANSPARENCY:** In the processing of personal data, the holder's right to obtain and know from the data controller and/or data processor, at any time and without restrictions, information about the existence of data concerning him/her shall be guaranteed.
- F. **RESTRICTED ACCESS AND CIRCULATION:** The treatment is subject to the limits derived from the nature of the personal data, from the provisions of the law on the treatment of personal data and the Constitution. In this sense, the treatment can only be done by persons authorized by the holder and/or by the persons foreseen in the law on application of personal data. The personal data given to ALGRANEL S.A. will be used only for a legitimate purpose, according to the nature of the data and with previous authorization of the holder. The holder with his authorization, will authorize ALGRANEL S.A. in the same way, to the transmission of his personal data for the purposes mentioned in the present document to persons in charge of the treatment. The personal data under custody of ALGRANEL S.A., except those catalogued as public information, will not be available in Internet or in any other means of massive disclosure, unless the access is technically controllable and safe, and this access has the purpose of providing a restricted knowledge only to the holders or authorized third parties according to the law and the principles that govern the matter.
- G. **DATA SECURITY:** ALGRANEL S.A. will adopt the technical, human and administrative measures necessary to guarantee the security in order to avoid adulteration, loss, consultation, use or non authorized or fraudulent access.
- H. **CONFIDENTIALITY:** ALGRANEL S.A. and all the people who intervene in the treatment of personal data, have the professional obligation to keep and maintain the reserve of such data, except for the legal exceptions. This obligation subsists even when the relationship that gave origin to the collection and treatment of the data is finished. ALGRANEL S.A. will implement, in its contractual relations, data protection clauses in this sense.

#### 4. RIGHTS OF DATA SUBJECTS.

The holders of the personal data contained in databases that rest in the information systems of ALGRANEL S.A., have the rights here described in compliance with the fundamental guarantees consecrated in article 8 of the law 1581 of 2012:

- a) To know, update and rectify your personal data before ALGRANEL S.A. or the person in charge in case there is any. This right may be exercised, among others, against partial, inaccurate, incomplete, fractioned, misleading data, or those whose treatment is expressly prohibited or has not been authorized;
- b) Request proof of the authorization granted to ALGRANEL S.A. except when expressly exempted as a requirement for the Processing, in accordance with the provisions of Article 10 of Law 1581 of 2012.
- c) Be informed by ALGRANEL S.A. or the person in charge of the treatment, if any, upon request, regarding the use given to your personal data.
- d) File complaints before the Superintendence of Industry and Commerce for violations of the provisions of Law 1581 of 2012 and other regulations that modify, add or complement it.
- e) To revoke the authorization and/or request the deletion of the data when the treatment does not respect the principles, rights and constitutional and legal guarantees, by filing a claim, in accordance with the provisions of Article 15 of Law 1581 of 2012 and the contents of this policy. If after the expiration of the legal term included in this policy, ALGRANEL S.A. and/or the person in charge, if any, as the case may be, have not eliminated the personal data, the Holder will have the right to request the Superintendence of Industry and Commerce to order the revocation of the authorization and/or the suppression of the personal data. For these purposes, the procedure described in Article 22 of Law 1581 of 2012 shall apply. The request for deletion of the information and the revocation of the authorization will not proceed when the Data Subject has a legal or contractual duty to remain in the database.

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- f) Access free of charge to your personal data that have been subject to Processing.
- g) To have access to this Policy and its modifications in a timely manner, prior to their implementation.

The exercise of these rights will be free and unlimited by the holder of the personal data, without prejudice to legal provisions that regulate the exercise thereof, as in the case of the right of access. After verification of identity, the information requested by the holder may be provided by any means, including electronic means, as required by the holder and in accordance with the provisions of this policy. The information shall be easy to read, without technical barriers that prevent its access and shall fully correspond to the information contained in the entity's database.

The Holder will be able to exercise once (1) every calendar month, the right described in literal f) free of charge. For consultations whose periodicity is greater than one for each calendar month, ALGRANEL S.A. will be able to charge the holder the expenses of shipment, reproduction and, in its case, certification of documents. The reproduction costs cannot be higher than the recovery costs of the corresponding material.


## 5. DUTIES OF THE RESPONSIBLE PARTY

ALGRANEL S.A., in its quality of Responsible, will be obliged to fulfill the following duties:

- a) Guarantee the holder, at all times, the full and effective exercise of his or her habeas data rights;
- b) Request and keep a copy of the respective authorization granted by the holder;
- c) Duly inform the owner about the purpose of the collection and the rights he/she has by virtue of the authorization granted;
- d) Keep the information under the necessary security conditions to prevent its adulteration, loss, consultation, unauthorized or fraudulent use or access;
- e) Guarantee that the information stored corresponds to that provided by the owner, based on the idea that it is truthful, complete, accurate, updated, verifiable and understandable;
- f) To update the information, communicating in a timely manner to the data processor, all the news regarding the data previously provided and to adopt the other necessary measures so that the information provided to the data processor is kept up to date;
- g) Rectify the information when it is incorrect and communicate the pertinent to the person in charge of the treatment;
- h) To provide to the data processor, as the case may be, only data whose processing has been previously authorized;
- i) To require the data processor at all times to respect the security and privacy conditions of the owner's information;
- j) To process queries and claims formulated in the terms indicated in this policy;
- k) Adopt an internal manual of policies and procedures to ensure compliance with the law and, in particular, to deal with queries and complaints;
- l) Inform the data processor when certain information is under discussion by the owner, once the claim has been filed and the respective process has not been completed;
- m) Inform upon request of the owner about the use given to their data;
- n) Inform the data protection authority when there are violations to the security codes and there are risks in the administration of the information of the owners;
- o) Comply with the instructions and requirements issued by the Superintendence of Industry and Commerce.

Additionally, in case of not having a person in charge, ALGRANEL S.A. will also have this quality and will have to fulfill the following obligations:

- a) Register in the database the legend "*claim in process*" in the manner regulated in the rules of personal data protection and this policy.
- b) Insert in the database the legend "*information under judicial discussion*" once notified by the competent authority about judicial processes related to the quality of the personal data;

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- c) Refrain from circulating information that is being disputed by the Holder and whose blocking has been ordered by the Superintendence of Industry and Commerce;
- d) Allow access to information only to those who can access it.

## 6. SPECIFIC POLICIES FOR THE PROCESSING OF PERSONAL DATA

### 6.1 CUSTOMER RELATED PERSONAL DATA

Under the terms of the authorization granted in case it is necessary for the treatment and the guidelines of the present policy, ALGRANEL S.A. will collect, store, use, circulate or suppress the data collected from the clients. ALGRANEL S.A. will only collect the data that are necessary, pertinent and not excessive to fulfill the established in the conditions of provision of services agreed with the clients.

The purposes for which the personal data of customers will be used are:

- Communication at different stages of service delivery;
- Inform about new services or modifications to existing ones;
- Contractual, commercial, customer service purposes, among others directly related to ALGRANEL S.A.'s corporate name and the type of legal relationship it has with the owner of the data.
- Surveys on satisfaction with the services provided by ALGRANEL S.A.
- Prevention and control of money laundering and financing of terrorism.

ALGRANEL S.A. will also be able to carry out the operations of treatment previously referred on the personal data of the suppliers of transport services and inspection of its clients, attending the characteristics of the services that they are going to carry out in the facilities of ALGRANEL S.A. with the purpose of guaranteeing the security of the people and goods that enter to our facilities.

The clients' data are kept and managed under ALGRANEL S.A. responsibility.

### 6.2 PERSONAL DATA RELATED TO HUMAN RESOURCES MANAGEMENT

There will be separate databases for the processing of personal data before, during and after the employment relationship.

#### 6.2.1 Data processing prior to the contractual relationship

ALGRANEL S.A. will inform the persons selected to participate in a selection process, the rules applicable to the treatment of the personal data provided by the interested party, as well as those obtained during the selection process.

The purpose of the delivery of the data provided by the interested parties in the vacancies of ALGRANEL S.A. and the personal information obtained from the selection process, is limited to the participation in the same; therefore, its use for different purposes, as well as its storage after the closing of the selection process is strictly forbidden.


The purpose of the delivery of the data provided by the interested parties in the vacancies of ALGRANEL S.A. and the personal information obtained from the selection process, is limited to the participation in the same; therefore, its use for different purposes, as well as its storage after the closing of the selection process is strictly forbidden.

#### 6.2.2 DATA PROCESSING DURING THE CONTRACTUAL RELATIONSHIP.

ALGRANEL S.A. will store the personal data obtained during the selection process of the employees in a folder identified with the name of each one of them.

Employees' personal data is retained, used or circulated exclusively for the fulfillment of the following purposes:

- Administration of the contractual relationship.
- To comply with Colombian or foreign law and the orders of judicial or administrative authorities or private entities in the exercise of public functions;

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- Issue certifications regarding the relationship of the data subject with the company.

The use of employee information for purposes other than the administration of the contractual relationship is prohibited, unless there is express authorization from the owner for a different use or there is an order from a competent authority, as long as such authority has the power to do so. It will correspond to ALGRANEL S.A. to evaluate the competence and effectiveness of the order of the competent authority, in order to prevent an unauthorized transfer of personal data.

### **6.2.3 Data processing after termination of the contractual relationship**

Once the labor relationship is terminated, whatever the cause, ALGRANEL S.A. will proceed to store the personal data obtained from the selection process and documentation generated in the development of the labor relationship, in a central file, under the measures and security levels that guarantee the protection of the information and avoid its unauthorized use.

The personal data of former employees are kept exclusively for the following purposes:

- To comply with Colombian or foreign law and the orders of judicial or administrative authorities or private entities in the exercise of public functions;
- Issue certifications regarding the relationship of the data subject with the company.

### **6.3 PROCESSING OF SHAREHOLDERS' PERSONAL DATA**

The data of the natural persons who become shareholders of ALGRANEL S.A., are of confidential character. Consequently, the access to such personal information will be carried out according to the established in the Code of Commerce and other norms that regulate the matter.

The purposes for which the shareholders' personal data will be used are as follows:

- To allow the exercise of the duties and rights derived from the quality of shareholder.
- Sending invitations to events scheduled by the Company.
- Issuance of certifications regarding the relationship of the data subject with the company.

### **6.4 PROCESSING OF PERSONAL DATA OF MEMBERS OF THE BOARD OF DIRECTORS.**

The data of natural persons who become members of the Board of Directors will be used for the following purposes:

- To allow the exercise of the duties and rights derived from being a member of the board of directors.
- Sending invitations to events scheduled by the Company.
- To comply with Colombian or foreign law and the orders of judicial or administrative authorities or private entities in the exercise of public functions.


### **6.5 PROCESSING OF PERSONAL DATA OF SUPPLIERS AND CONTRACTORS**

ALGRANEL S.A. will only collect the necessary, pertinent and not excessive data for the purpose of selection, evaluation and execution of the contract agreed with the supplier/contractor.

The purposes for which the personal data of suppliers and contractors will be used are:

- Sending invitations to hire
- Management of pre-contractual, contractual and post-contractual stages
- Conformity assessment.
- Prevention and control of money laundering and financing of terrorism.

ALGRANEL S.A. will be able to collect personal data of the employees of its suppliers or contractors attending the characteristics of the services that are contracted with the supplier or contractor.

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When ALGRANEL S.A. gives data of its employees to its suppliers, these will have to protect the personal data provided. ALGRANEL S.A. will verify that the requested data are necessary, pertinent and not excessive with respect to the purpose that founds the request of access to them.

## 6.6 PROCESSING OF DATA OF MINORS

In accordance with Article 7° of Law 1581 of 2012, ALGRANEL S.A. performs Processing of personal data of children and adolescents within the framework of the criteria outlined in Article 2.2.2.2.25.2.9 section 2 of Chapter 25 of Decree 1074 of 2015 (Article 12 of Decree 1377 of 2013), with observance of the following parameters and requirements:

1. That the use of the data responds to and respects the best interests of children and adolescents.
2. That in the use of the data, respect for the fundamental rights of the minor is ensured.

Once the above requirements are fulfilled, ALGRANEL S.A. will request the legal representative of the child or adolescent the authorization prior exercise of the minor's right to be heard, opinion that will be assessed taking into account the maturity, autonomy and ability to understand the matter. In its capacity as Responsible and/or Responsible Party, it shall ensure the proper use of the data of children and adolescents by applying the principles and obligations established in Law 1581 of 2012 and regulatory standards. Likewise, it will identify the sensitive data collected or stored in order to increase the security and treatment of the information.

## 6.7 PROCESSING OF PERSONAL DATA OF THIRD PARTIES.

This treatment applies to third parties whose activities must be carried out in the company's facilities, such as shipping companies, transporters, visitors, authorities and inspection companies. ALGRANEL S.A. will only collect the necessary, pertinent and not excessive data according to the characteristics of the services provided to ALGRANEL S.A. clients.

The purposes for which the personal data of suppliers will be used are:

- Authorization to enter and carry out activities within the company's facilities.
- Communication in the different activities in which they are involved.
- To comply with Colombian or foreign law and the orders of judicial or administrative authorities or private entities in the exercise of public functions.


## 7. COLLECTION OF PERSONAL DATA BY PERSONS OTHER THAN ALGRANEL S.A.

Any person who enters the facilities of ALGRANEL S.A. shall refrain from collecting any personal data, unless he/she has the respective authorization. In case a person collects personal data, without having the respective authorization, he/she could be sanctioned according to the Law 1581 of 2012 and the other norms that modify, add or complement it. In these cases, ALGRANEL S.A. will not have the quality of responsible and/or in charge, besides it will not have any responsibility for such fact since it has not intervened in the treatment of such data.

## 8. DATA PROCESSING IN VIDEO SURVEILLANCE SYSTEMS

ALGRANEL S.A. will inform people about the existence of video-surveillance mechanisms, through the posting of visible notices within the reach of all the owners and installed in the video-surveillance areas, mainly in the entrance areas to the places that are being watched and monitored and inside them. These notices shall inform who is the Data Controller, the purposes of the processing, the rights of the Data Subject, the channels enabled to exercise the rights of the Data Subject, as well as where the Information Processing Policy is published.

On the other hand, it will keep the images only for the time strictly necessary to fulfill the purpose of the and will register the database that stores the images in the National Registry of Databases, unless the Processing consists only in the reproduction or broadcasting of images in real time.

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Access and disclosure of images will be restricted to persons authorized by the Data Subject and/or by request of an authority in the exercise of its functions. Consequently, the disclosure of the information collected will be controlled and consistent with the purpose established by the Data Controller.

## 9. SECURITY MEASURES

In order to comply with the security principle enshrined in Article 4 paragraph g) of Law 1581 of 2012, has implemented technical, human and administrative measures necessary to ensure the security of records to prevent tampering, loss, consultation, use or unauthorized or fraudulent access.

ALGRANEL S.A. by means of the subscription of the corresponding transmission contracts, has required to the persons in charge of the treatment with which it works the implementation of the necessary security measures to guarantee the security and confidentiality of the information in the treatment of the personal data.

The information security measures are in the ALGRANEL S.A. Security Policy.

## 10. COOKIES OR WEB BUGS

ALGRANEL S.A. can collect personal information of its users while they use the Web Page, the Application or the Linked Pages (Landing Page). The users can choose to store this personal information in the web page, the application or in the linked portal (Landing Page), with the purpose of facilitating the transactions and the services to provide on the part of ALGRANEL S.A and/or its linked portals (Landing Page). For what, ALGRANEL S.A uses different technologies of pursuit and compilation of data like, own Cookies and of third, this is the tool of analysis that helps the owners of web sites and of applications to understand how the visitors interact with their properties. This tool may use a set of cookies to collect information and provide website usage statistics without personally identifying Google visitors.

This information allows us to know your navigation patterns and to offer you personalized services. ALGRANEL S.A. will be able to use these technologies to authenticate you, to remember your preferences for the use of the web page, the application and the linked pages (Landing Page), to present offers that can be of your interest and to facilitate transactions, to analyze the use of the web page, the application or the linked pages and its services, to use it in the aggregate or to combine it with the personal information that we have and to share it with the authorized entities.

## 11. PROCEDURES FOR THE EXERCISE OF HOLDER RIGHTS

In accordance with Article 8 of Law 1581 of 2012, Article 2.2.2.25.4.1 Section 4 Chapter 25 of Decree 1074 of 2015 (Articles 21 and 22 of Decree 1377 of 2013), Data Subjects may exercise a number of rights in relation to the processing of their personal data. The Data Subject shall have the following rights:

- a) To know, update and rectify their personal data with respect to the Data Controllers or Data Processors. This right may be exercised, among others, against partial, inaccurate, incomplete, fractioned, misleading data, or data whose processing is expressly prohibited or has not been authorized;
- b) Request proof of the authorization granted to the Data Controller, except when expressly exempted as a requirement for the processing, in accordance with the provisions of Article 10 of this law;
- c) To be informed by the Data Controller or the Data Processor, upon request, regarding the use that has been made of their personal data;
- d) To file before the Superintendence of Industry and Commerce complaints for violations of the provisions of this law and other regulations that modify, add or complement it;
- e) To revoke the authorization and/or request the deletion of the data when the principles, rights and constitutional and legal guarantees are not respected in the processing. The revocation and/or deletion will proceed when the



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Superintendence of Industry and Commerce has determined that in the Processing the Controller or Processor has incurred in conduct contrary to the law and the Constitution;

- f) Access free of charge to your personal data that have been subject to Processing.

These rights may be exercised by the following persons.

By the Data Controller, who must prove his identity sufficiently by the different means made available to him by the Controller.

2. By their successors in title, who must prove their status as such.

By the representative and/or attorney-in-fact of the Holder, upon accreditation of the representation or power of attorney.

4. By stipulation in favor of another and for another.

The rights of children and adolescents shall be exercised by persons authorized to represent them.

### 11.1. 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 of his or her personal data.

### 11.2. RIGHT TO FILE COMPLAINTS AND GRIEVANCES

The Law distinguishes four types of claims:

- *Claim for correction*: the right of the Data Subject to update, rectify or modify partial, inaccurate, incomplete, fractioned, misleading data, or data whose processing is expressly prohibited or has not been authorized.
- *Claim for suppression*: the right of the Data Subject to have data that is inadequate, excessive or that does not respect the constitutional and legal principles, rights and guarantees deleted.
- *Revocation claim*: the right of the Data Subject to cancel the authorization previously given for the processing of his/her personal data.
- *Infringement complaint*: the Data Subject's right to request that a breach of Data Protection regulations be remedied.

### 11.3. RIGHT TO REQUEST PROOF OF THE AUTHORIZATION GRANTED TO THE CONTROLLER

Except when expressly exempted as a requirement for processing in accordance with the provisions of Article 10 of Law 1581 of 2012.

### 11.4. RIGHT TO FILE WITH THE SUPERINTENDENCY OF INDUSTRY AND COMMERCE COMPLAINTS OF VIOLATIONS

The Data Subject or assignee may only submit a petition (complaint) to the SIC - Superintendence of Industry and Commerce, once the consultation or complaint process has been exhausted before the Data Controller or Data Processor.

### 11.5 ATTENTION TO FORMALITIES AND PERSON IN CHARGE

The owners or entitled parties may send their requests, queries or claims through the following e-mail address [datos.personales@algranel.com.co](mailto:datos.personales@algranel.com.co) provided by ALGRANEL S.A. for the attention of such procedures. This mail will be managed by the personal data protection officer, identified at the end of this document.

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## 12. AUTHORIZATION FOR THE PROCESSING OF PERSONAL DATA

ALGRANEL S.A. will have mechanisms that allow the owners of personal data or those who are legitimized, to express their authorization to the treatment and will ensure that such mechanisms will allow to keep record of such consent and allow subsequent consultation. In accordance with article 7 of Decree 1377 of 2013, ALGRANEL S.A. may obtain the authorization by i) in writing, ii) orally or iii) through unequivocal conducts that allow to reasonably conclude that the authorization was granted.

## 13. AUTHORIZATION FOR THE PROCESSING OF SENSITIVE DATA.

In case of collection of sensitive data, category defined in this policy, the Holder is not obliged to authorize its treatment. ALGRANEL S.A. will not collect or treat data of this type except with the express authorization of the holder or by express legal disposition.

## 14. VALIDITY OF THE DATABASES.

The databases in which personal data will be registered will be valid for the time the information is kept and used for the purposes described in this policy. Once such purpose(s) is/are fulfilled and as long as there is no legal or contractual duty to keep your information, your data will be deleted from our databases.

## 15. DELIVERY OF PERSONAL DATA TO THE AUTHORITIES

When ALGRANEL S.A. receives a request from a State authority for the access and/or delivery of personal data that rest in the company's data bases, a record of the remission of the personal data provided will be left.

## 16. VALIDITY OF THE POLICY

The present policy of protection of personal data is effective from its publication, that is to say, November 12, 2024, and it is of obligatory fulfillment for all the employees of ALGRANEL S.A.

ALGRANEL S.A. prohibits the access, use, management, cession, communication, storage and any other treatment of personal data without authorization of the holder of the same one.

This information is published on our website [www.algranel.com.co](http://www.algranel.com.co) Contact Us section.

## 17. MODIFICATIONS TO THE PERSONAL DATA PROCESSING POLICY

In case of substantial changes to this policy, we will inform the holders of personal data by email, phone calls or text messages, posting on our website or any other effective means for that purpose. Such notification will be made prior to or no later than the time of implementation of the new policies.

Substantial changes will be understood as those modifications referred to the identification of the person in charge and the purpose of the personal data treatment. In case of modification referring to the purpose of the treatment, ALGRANEL S.A. will have to obtain a new authorization.

## ALGRANEL S.A.

NIT 860053976-0

Responsible for the attention of requests, consultations: Personal Data Protection Officer - Patricia Zair Martínez Murillo.

Address: Carrera 13 # 63 - 39 Piso 12, Bogotá D.C. - Colombia.

	<p style="text-align: center;">POLICY PERSONAL DATA PROTECTION POLICY ALGRANEL S.A.</p>	CODE: GRG-PL-001
		VERSION: 04
		DATE: 20-11-2024

E-mail: [datos.personales@algranel.com.co](mailto:datos.personales@algranel.com.co)

PBX: (571) 640 96 66

Fax: (571) 235 35 81

VERSION	DATE	DESCRIPTION OF THE CHANGE
03	04-07-2023	Modification of the Bogotá office address and elimination of FAX number.
04	20-11-2024	General Policy Review.

DRAFTED	REVISED	APPROVED
Name: Yazmin Montañez Position: Senior Attorney Date: 20-11-2024	Name: Diana Ardila Position: GIS Leader Date: 20-11-2024	Name: Eugenia Ocampo Position: Regulatory Manager Date: 20-11-2024