



PERSONAL DATA TREATMENT POLICY

This policy aims to develop the constitutional and legal protection of the processing of personal data of those natural and legal persons who in attribution of their rights can know, update and rectify the information that has been collected about them in databases or digital files of **LARM COLOMBIA SAS**, in compliance with Law 1581 of 2012 "By which general provisions are issued for the protection of personal data", Regulatory Decree 1377 of 2013 and Regulatory Decree 1074 of 2015 chapters 25 and 26 (or any other norm that regulates, adds, executes, complements, modifies, deletes or repeals Law 1581 of 2012).

1. IDENTIFICATION OF THE PERSON IN CHARGE:

LARM COLOMBIA S.A.S., is a commercial Company identified with NIT 830.131.214-2 is established as a Colombian Company, whose corporate purpose is to provide comprehensive support services with expert advice on immigration regulations, relocation, tax advice and administration of transfers from a single point of contact.

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2. OBJECTIVE

This Policy establishes the general guidelines for the protection and processing of personal data within the Company, thus allowing to strengthen the level of trust between the person in charge and the Holders in relation to the processing of their information; Inform the Holders of the purposes and transfers to which their personal data are subjected and the mechanisms and forms for the exercise of their rights.



3. SCOPE

This Personal Data Treatment and Protection Policy will be applied to all databases and/or files that include personal data that are subject to treatment by **LARM COLOMBIA S.A.S.**, as the person responsible for the processing of personal data.

This policy constitutes versión 2.0 of the company's personal data treatment policy, the above, based on the process of updating the databases that the Company carried out in compliance with External Circular 003 of 2018, this is the update that every Company from its databases must carry out **between January 2 and March 31 of each year from 2020.**

4. DEFINITIONS

- **Habeas Data:** Everyone's right to know, update and rectify the information that has been collected about them in files and databases of a public or private nature.
- **Personal Data:** Any information linked or that may be associated with one or more specific or determinable natural persons.
- **Datosbase:** Organized set of personal data that is subject to treatment.
- **Treatment:** Any operation or set of operations on personal data, such as the collection, storage, use, circulation or deletion.
- **Authorization:** Prior, express and informed consent of the Holder to carry out the processing of personal data.
- **Notice of Privacy:** It is the physical, electronic document or in any other known or unknown format, which is made available to the Holder in order to inform about the processing of their personal data.
- **Holder:** Natural person whose personal data are subject to treatment.
- **Successor:** Person who by succession or transmission acquires the rights of another person.
- **Responsible for the Treatment:** Natural or legal person, public or private, that by itself or in association with others, decides on the database and/or the processing of the data.
- **In charge of the Treatment:** 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 Responsible for the treatment.

5. GUIDING PRINCIPLES APPLICABLE TO PERSONAL DATA

Regarding the protection of personal data, the following guiding principles will apply:





a) Principle of legality regarding data Processing: The processing referred to in the Habeas Data Law is a regulated activity that must be subject to what is established therein and the other provisions that develop it.

b) Principle of purpose: The treatment must obey a legitimate purpose in accordance with the Constitution and the law, which must be informed to the Holder.

c) Principle of freedom: The treatment can only be exercised with the prior, express and informed consent of the Holder. Personal data may not be obtained or disclosed without prior authorization, or in the absence of a legal or judicial mandate that relieves consent.

d) Principle of truthfulness or quality: The information subject to treatment must be truthful, complete, exact, updated, verifiable and understandable. The processing of partial, incomplete, fractional or misleading data is prohibited.

e) Principle of transparency: In the treatment, the right of the Holder to obtain from the person responsible or in charge of the treatment, at any time and without restrictions, information about the existence of data that concerns him.

f) Principle of Access and restricted circulation: The treatment is subject to the limits that derive from the nature of the personal data, the provisions of the law and Constitution. In this sense, the treatment can only be done by people authorized by the Holder and / or by the people provided by law.

Personal data, except for public information, may not be available on the internet or other means of dissemination or mass communication, unless the access is technically controllable to provide restricted knowledge only to Holders or authorized third parties in accordance with the law.

g) Principle of Security: The information subject to treatment by the person responsible or in charge of the treatment referred to in the Habeas Data Law, must be managed with the technical, human and administrative measures that are necessary to provide security to the records avoiding their adulteration, loss, consultation, use or unauthorized or fraudulent access.

h) Principle of confidentiality: All persons who intervene in the processing of personal data that are not public are obliged to guarantee the reservation of the information, even after the end of their relationship with any of the tasks that comprise the treatment, being able only carry out supply or communication of personal data when this corresponds to the development of the activities authorized by law and in the terms of this.





6. RIGHTS OF THE HOLDERS

Holders of personal data will enjoy the following rights, and those granted by law:

- a) Know, update and rectify your personal data in front of the person responsible for the treatment or those in charge of the treatment. 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 the person responsible for the treatment except when expressly excepted as a requirement for the treatment, in accordance with the provisions of article 10 of the law;
- c) Be informed by the person responsible or in charge for the treatment upon request, regarding the use that has been given to their personal data;
- d) Present to the Superintendencia de Industria y Comercio complaints for infractions to the provisions of the law and other regulations that modify, add or complement it;
- e) 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 treatment. The revocation and / or deletion will proceed when the Superintendencia de Industria y Comercio has determined that in the treatment the person responsible or in charge has incurred in conduct contrary to the law and the Constitution;
- f) Free Access to your personal data that has been processed.

7. AUTHORIZATION OF THE OWNER OF PERSONAL DATA

Without prejudice to the exceptions provided in Statutory Law 1581 of 2012, as a general rule in the processing of personal data, **LARM COLOMBIA S.A.S.** will collect the prior and informed authorization of the Holder, which may be obtained by any means that may be object of further consultation.



Events in which authorization is not necessary

The authorization of the Holder will not be necessary in the case of:

- a) Information required by a public or administrative entity in the exercise of its legal functions or by court order;
- b) Data of a public nature;
- c) Cases of medical or health emergency;
- d) Treatment of information authorized by law for historical, statistical or scientific purposes;
- e) Data related to the Registro Civil of persons.

8. DUTIES OF LARM COLOMBIA S.A.S. AS THE PERSON RESPONSIBLE FOR THE PROCESSING OF PERSONAL DATA

LARM COLOMBIA S.A.S. as the person responsible for the processing of personal data, will fulfill the following duties:

- a) Guarantee the Holder, at all times, the full and effective exercise of the right to habeas data.
- b) Request and keep, under the conditions provided by law, a copy of the respective authorization granted by the Holder;
- c) Properly inform the Holder about the purpose of the collection and the rights that assist him by virtue of the authorization granted;
- d) Keep the information under the necessary security conditions to prevent its adulteration, loss, consultation, use or unauthorized or fraudulent access;
- e) Guarantee that the information provided to the person in charge of the treatment is truthful, complete, exact, updated, verifiable and understandable;
- f) Update the information, communicating in a timely manner to the person in charge of the treatment, all the news regarding the data that you have previously provided and adopt the other necessary measures so that the information provided to it 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) Provide the person in charge of the treatment, as the case may be, only data whose treatment is previously authorized in accordance with the provisions of this law;



- i) Require the person in charge of the treatment, at all times, to respect the security and privacy conditions of the Holder's information;
- j) Process the queries and claims formulated in the terms indicated in Statutory Law 1581 of 2012.
- k) Adopt and internal manual of policies and procedures to guarantee adequate compliance with the law and, in particular, for the attention of queries and complaints.
- l) Inform the person in charge of the treatment when certain information is under discussion by the Holder, once the claim has been submitted and the respective procedure has not been completed;
- m) Inform at the request of the Holder about the use given to their data;
- n) Inform the data protection authority when there are violations of the security codes and there are risks in the administration of the information of the Holders;
- o) Comply with the instructions and requirements issued by the Superintendencia de Industria y Comercio.

9. SPECIFIC POLICIES FOR THE PROCESSING OF PERSONAL DATA

9.1 Processing of Personal Data of Workers

LARM COLOMBIA S.A.S. collects the personal data of its workers which are classified by the Company as reserve, and will only be disclosed by the Company with the express authorization of the owner or when a Competent Authority requests it.

The purposes for which the personal data of the company's employees are used will be:

- a) Comply with the obligations imposed by Colombian labor law on employers, or with the orders issued by the competent Colombian or foreign authorities.
- b) Issue certifications regarding the relationship of the data owner with the Company.
- c) Comply with the obligations imposed on the Company as an employer, in relation to Occupational Health and Safety regulations, and the so-called Occupational Health and Safety Management System (SG-SST).
- d) Manage the functions performed by the workers.
- e) Execute the different stages of the Company's disciplinary processes and consult memos, calls for attention or any type of sanction imposed on collaborators.
- f) Contact family members in emergencies.
- g) Give management and control to the payroll



- h)** Control the hours of workers and the overtime they work.
- i)** Keep a control of disability, absenteeism, leave and vacations of workers.
- j)** Keep track of the training given to workers.
- k)** Store your personal data, including biometric data on its website to support the activities carried out.
- l)** Comply with the biosafety protocols applicable to the Company in accordance with the provisions issued by the National Government.
- m)** Carry out a control, monitoring and evaluation of workers.
- n)** Take images and photographs necessary for the recognition of the worker, compliance control and collection of evidence of the services developed.
- o)** Additionally, biometric data of the workers are used for commercial purposes related to the company's corporate purpose.
- p)** Communicate information about workers to third parties with which the Company maintains a contractual relationship, partners or consortiums and clients to the extent necessary to comply with the third party protocol, with the sole effects that they can manage the control and coordination with respect to the personnel who effectively provide the services derived from the professional relationship, as well as making it possible to comply with legal, tax and social security obligations.
- q)** Communicate data of an identifying nature of workers to travel agencies, transport companies, hotels and other entities for the management of reservations and settlement of the expenses incurred.
- r)** Carry out the international transfer or transmission of data to countries that provide protection similar to that of Colombia.
- s)** Delivery of the information to third parties in charge of evaluation, training, certification, and other processes required in the development of the contractual relationship.
- t)** Verify, compare, evaluate the work and personal skills of employees.
- u)** Sending information to compensation funds, AFP, ARL, insurance companies, among others.
- v)** Initiate internal investigations based on complaints presented by active and non-active employees, third parties or the collaborators themselves.
- w)** Management of complaints to workers for workplace harassment or violation of codes of conduct.
- x)** For the purpose of complying with the company's internal policies, which are in accordance with current regulatory requirements.
- y)** To supply personal data for affiliations to the Social Security System, data of the relatives of the personnel hired under any form of hiring by the Company.



- z) To supply bank accounts for payment of salaries and fees and in general the acceptance of internal procedures for entry, occupational health and hiring as an employee at **LARM COLOMBIA S.A.S.**, or any affiliate and / or associated, and everything related to the processing of personal data framed in the fulfillment of the relationships, objectives, obligations, rights and other elements originated in the type of contractual relationship in the labor framework.

LARM COLOMBIA S.A.S. stores the personal data of its employees, including those obtained during the selection process, and keeps them in a folder identified with the name of each one of them.

This folder will only be accessed and processed by the Human Resources Area, in order to administer the contractual relationship between **LARM COLOMBIA S.A.S.** and the employee.

LARM COLOMBIA S.A.S. treats sensitive personal data of its workers such as the data of their minor children with the sole purpose of registering them as beneficiaries of the social security and parafiscal system. For the purposes of this Treatment, the respective authorization is collected which in any case, will be express and optional, clearly indicating the Sensitive Personal Data object of Treatment and the purpose of this.

Likewise, it will have high security systems for the handling of sensitive data and its reservation, with the understanding that such sensitive data will only be used by **LARM COLOMBIA S.A.S.** for the aforementioned purposes.

After the employment relationship, **LARM COLOMBIA S.A.S.** will proceed to store all the personal data obtained from the selection process and the documentation generated in the development of the employment relationship, in a central file with restricted access, subjecting the information to adequate security measures and levels at all times given that the employment information may contain data of a sensitive nature.

In any case, the information will not be processed for a period exceeding twenty (20) years from the termination of the employment relationship, or in accordance with the legal or contractual circumstances that make the handling of the information necessary.

Finally, in accordance with the provisions of **External Circular 008 of 2020** of the Superintendencia de Industria y Comercio, the data collected to comply with the biosafety protocols will only be used for the purposes indicated by the Ministry of Health and Social Protection, and they will only be stored for a reasonable time necessary to comply with these protocols. Once the purpose of





the Personal Data Processing has been fulfilled, the Company will automatically delete the data collected.

9.2 Processing of personal data of SENA Apprentices:

LARM COLOMBIA S.A.S. collects the personal data of its apprentices and stores them in a database which is classified by the Company as reserve, and will only be disclosed with the express authorization of the owner or when a Competent Authority requests it.

The purposes for which the personal data of SENA apprentices of **LARM COLOMBIA S.A.S.** are used, will be:

- a) To comply with the obligations imposed by Colombian labor law on employers, especially the provisions of Law 789 of 2002 as well as its Regulatory Decrees.
- b) Issue certifications regarding the relationship of the data holder with the Company.
- c) Corroborate any requirement that may arise in the development of the apprenticeship bonding process.
- d) Comply with the obligations imposed on the Company as an employer, in relation to Occupational Health and Safety Standards, and the so-called Occupational Health and Safety Management System (SG-SST).
- e) Manage the functions performed by the apprentices.
- f) Control the development of apprentices in the teaching stage and practical stage.
- g) Contact relatives in cases of emergency.

In any case, the information will not be processed for a period greater than the duration of the applicant's relationship with the company, which in no case may exceed two **(2) years**, and the additional time required in accordance with the legal or contractual circumstances that make it necessary to handle the information.

9.3 Treatment of Personal Data of Clients:

LARM COLOMBIA S.A.S. collects the personal data of its clients and stores them in a database which is classified by the Company as reserve, and will only be disclosed with the express authorization of the owner or when a Competent Authority requests it.

The purposes for which the personal data of the clients of **LARM COLOMBIA S.A.S.** are used, will be:



- a) Process of control and accounting record of the obligations incurred with the clients.
- b) Compliance with tax and legal aspects before public and regulatory entities.
- c) Compliance with contractual obligations, for which the information may be transferred to third parties, such as financial entities, notaries, lawyers, etc.
- d) Compliance with judicial decisions and administrative, legal, fiscal and regulatory provisions.
- e) Administrative management for the execution of the pre-contractual, contractual and post-contractual stages.
- f) Creation of client information in the platforms or software of the Company.
- g) Ensure the provision of transfer management services from a single point of contact.
- h) Evaluate customer service and conduct satisfaction surveys.
- i) Share the information with allied third parties that collaborate with the Company, considering that for the fulfillment of their assignments they must access the information to some extent, which will also be subject to the obligations of confidentiality, information management and data protection to which the society is subject.
- j) Process the requests, complaints or claims established directly by the client through the customer service channels.
- k) Contact the client through physical and electronic means – email, SMS or chat to send information of interest or related to the contractual relationship, invite him to training or with the portfolio of services.
- l) Maintain commercial contact with the Company, even after the termination of the contractual relationship.
- m) Consult, as a good business practice or legal obligation, the background of clients on restrictive lists, OFAC, PEPS, Clinton and UN lists, in order to prevent money laundering and financing of terrorism.
- n) So that **LARM COLOMBIA S.A.S.**, could comply with each and every one of the legal, commercial and contractual obligations with its national and foreign clients.
- o) For marketing and/or product promotion activities in the cases permitted by law and services related to the corporate purpose of **LARM COLOMBIA S.A.S.**
- p) To create and register in the accounting system of the company the clients (buyers) of the services of relocation of foreigners and migratory processes offered by **LARM COLOMBIA S.A.S.** in order to generate the respective accounting support or sales invoice.
- q) To create and register the clients from which information is obtained, in areas such as: Accounting, Human Resources, Marketing, Operations and Administration; however, to the above, the purpose established here will be accepted whenever a new one enters.
- r) Transmission of information and personal data in audit processes, relocation of foreigners and immigration processes with national and foreign companies.
- s) Administrative management for the execution of the pre-contractual, contractual and post-contractual stages with clients.



- t) Resolve and respond to customer requirements in relation to the corporate purpose of **LARM COLOMBIA S.A.S.**
- u) Creation of the client in the platforms or software of **LARM COLOMBIA S.A.S.**
- v) Guarantee the use of sensitive customer data, among them and as long as the information of the beneficiaries (boys, girls, adolescents) is applied.
- w) Respond to queries, complaints or claims regarding Law 1581 on habeas data in Colombia.
- x) Carry out commercial prospecting, e-mail marketing and marketing
- y) Share the information with third-party allies that collaborate with the company **LARM COLOMBIA S.A.S.**, establishing the purposes and corporate purpose of the company, considering that for the fulfillment of the orders a transfer and/or transmission of data will be carried out, which will be subject to the security and confidentiality measures of the company.
- z) To contact the client through different platforms such as: social networks, telemarketing, web page, email, messages, chats, and other physical channels, to send information of interest or in front of the portfolio of services or products of the company **LARM COLOMBIA S.A.S.**
- aa) Maintain contact with the company even after the termination of the contractual relationship.
- bb) Delivery of information through the business bulletin on events, training and information of interest about the company **LARM COLOMBIA S.A.S.**

In any case, the information will not be processed for a period greater than the duration of the contractual relationship between the client and the Company, and the additional time required in accordance with the legal or contractual circumstances that make it necessary to handle the data.

9.4 Treatment of Personal data of suppliers and Contractors

LARM COLOMBIA S.A.S. collects the personal data of its Suppliers and contractors stores them in a database which, although it is made up mostly of public data, is qualified by the Company as reserved, and in the case of private data, it will only reveal it by the Company with the express authorization of the owner or when a Competent Authority requests it.

The purposes for which the personal data of the Suppliers and Contractors of **LARM COLOMBIA S.A.S.** will be:





- a) Manage the contact data and public, private and semi-private personal information of the suppliers
- b) Manage billing statements presented by suppliers or contractors.
- c) Keep track of the contributions made to the social security system by contractors
- d) Carry out evaluations, re-evaluations and supplier management reports and selection of potential suppliers.
- e) Compliance with tax and legal aspects with public and regulatory
- f) Control and payments for goods and services received.
- g) Qualitative and quantitative evaluations of the levels of service received from suppliers
- h) Control process and accounting record of the obligations contracted with suppliers and contractors.
- i) Sending invitations to hire and carrying out procedures for the pre-contractual, contractual and post-contractual stages.
- j) Keep a record of supplier evaluation, re-evaluation and management reports
- k) Compliance with tax, legal, commercial, accounting and financial aspects with public and regulatory entities
- l) Control process and accounting record of commercial and contractual obligations acquired with national and foreign suppliers
- m) Transmission of information with companies and/or business partners regarding obligations with suppliers
- n) All others specifically established in the authorizations that are granted by the suppliers themselves.

LARM COLOMBIA S.A.S. will only collect from its suppliers and contractors the data that is necessary, pertinent and not excessive for the purpose of selection, evaluation and execution of the contract that may arise.

The collection of personal data of employees of suppliers by **LARM COLOMBIA S.A.S.** will, in any case, have the purpose of verifying the suitability and competence of the employees; that is, once this requirement has been verified, **LARM COLOMBIA S.A.S.** will return such information to the Provider, except when its conservation is expressly authorized.

In any case, the information will not be processed for a period greater than the duration of the relationship of the Supplier and the contractors with the Company, and the additional time required in accordance with the legal or contractual circumstances that make necessary the handling of the information.





9.5 Processing of shareholders personal data:

LARM COLOMBIA S.A.S. collects the personal data of its shareholders, stores them in a database which is qualified by the Company as reserved, and which will only be disclosed by the Company with the express authorization of the owner or when requested by a Competent Authority.

The purposes for the use of the personal data for the Shareholders will be:

- a) Allow the exercise of the duties and rights derived from the quality of shareholder
- b) Allow the shipping of invitations to events scheduled by the company
- c) Issue certifications related to the Holder's relationship with the Company
- d) Comply with the precepts and regulations established in the Code of Commerce and other applicable regulations
- e) Summon or invite them to the different meetings of a corporate nature that they must attend due to their capacity as shareholders.

9.6 Treatment of personal data of Visitors in the Admission Control:

LARM COLOMBIA S.A.S. collects the personal data of its visitors through forms and surveys that may include sensitive personal data such as temperature or the state of health of third parties, the above in compliance with the Company's biosecurity protocols. Said Information is stored in a database which is qualified by the entity as reserved, and will only be disclosed by the Company with the express authorization of the owner or when a Competent Authority requests it.

The purposes for the use of the personal data of those who enter the facilities of **LARM COLOMBIA S.A.S.** will be:

- a) Ensure the admission to the Company's facilities to people who have the authorization of free transit and restrict the passage to those people who are not authorized.
- b) Guarantee security in monitored environments.
- c) Allow adequate work environments for the safe development of activities within the Company.
- d) Comply with the obligations stipulated within the Occupational Health and Safety Management System.
- e) Comply with the biosafety protocols implemented by the Company.



In any case, the information will not be processed for a period exceeding one **(1) year** from its collection in accordance with the legal or contractual circumstances that make it necessary to handle the information.

In accordance with the provisions of **External Circular Letter 008 of 2020** of the Superintendencia de Industria y Comercio, the data collected to comply with the biosafety protocols will only be used for the purposes indicated by the Ministerio de Salud y Protección Social, and will only be stored for the time reasonable and necessary to comply with said protocols. Once the purpose of the Personal Data Processing has been fulfilled, the company will delete the data collected ex officio.

9.7 Processing of Personal Data on the Website

LARM COLOMBIA S.A.S. collects personal data from interested third parties through its website and stores them in a database which is qualified by the company as reserved, and will only be disclosed with the express authorization of the owner or when a Competent Authority requests it..

The purposes for the use of the personal data contained on the **LARM COLOMBIA S.A.S.'s** website will be:

- a) Allow communication with customers or third parties through the section "contact us".
- b) Facilitate the correct execution of purchases and contracting of services
- c) To facilitate proper access to the web pages of **LARM COLOMBIA S.A.S.**
- d) To publish events or news of interest
- e) Receive and process complaints and claims from third parties
- f) Legal, accounting, administrative, comercial, promotional, informative, marketing and sales purposes.
- g) Carry out promotion, marketing, advertising campaigns
- h) Publicize the company's service portfolio
- i) To contact the client through different platforms such as: social networks, telemarketing, website, email, messages, chats, and other physical channels, to send information of interest or in front of the portfolio of services or products of the company **LARM COLOMBIA S.A.S.**
- j) Create and manage databases (including sensitive databases) for the monitoring and support of the user in the provision of the service that the company markets, as well as the monitoring of complaints and/or claims, in compliance with the guarantee of our services, among others.



In any case, the information will not be processed for a period exceeding that agreed with the third party or user through a contract or authorization to use your personal data counted from its collection in accordance with the legal or contractual circumstances that make information management necessary.

9.8 Processing of personal data from the video Surveillance Registry

LARM COLOMBIA S.A.S. collects biometric data of its workers and visitors through its Surveillance cameras and stores them in a database which is qualified by the company as reserved, and will only be disclosed with the express authorization of the owner or when a Competent Authority request it.

The purposes for the use of personal data contained in the surveillance cameras of **LARM COLOMBIA S.A.S.** will be:

- a) Guarantee safety in work environments.
- b) Allow adequate work environments for safe development of the company's work activities.
- c) Control the entry, permanence and exit of employees and contractors in the company's facilities.

To comply with the duty of information that correspond to **LARM COLOMBIA S.A.S.** as administrator of personal data, the company will implement privacy notices in the areas where the capture of images that involve the processing of personal data is carried out.

In any case, the information will not be processed for a period exceeding five (5) **days** from its collection in accordance with the legal or contractual circumstances that make it necessary to handle the information.

9.9 Treatment of personal data of Biometric Control

LARM COLOMBIA S.A.S. collects biometric data of its workers and stores them in a database which is qualified by the company as reserved, and will only disclosed with the express authorization of the owner or when requested by a Competent Authority.

The purposes for the use of the personal data contained in the Surveillance Camaras of **LARM COLOMBIA S.A.S.** will be:





- a) Guarantee safety in work environments.
- b) Allow the Access only to authorized personnel
- c) Control the entry, permanence and exit of employees in the company's facilities.

In any case, the information will not be processed for a period exceeding the duration of the employment relationship with the worker.

9.10 Treatment of personal data of Customer Prospects:

LARM COLOMBIA S.A.S. has a record of Client prospects, whose information has been collected by the company with the prior express authorization of the Holder through events or through the completion of quote requests by them. **LARM COLOMBIA S.A.S.** stores said information in a database which is qualified by the company as reserved, and will only be disclosed with the express authorization of the owner or when a Competent Authority requests it.

The purposes for the use of personal data of Customer Prospects of **LARM COLOMBIA S.A.S.** will be:

- a) Sending invitations to events scheduled by the company.
- b) Send information about projects offered by the company to interested people
- c) Verify compliance with the requirements established by the Company to access a Project, agreement or contract.
- d) Carry out commercial prospecting activities and marketing operations.
- e) To process the queries, complaints or claims presented by the holders.
- f) To make management reports and internal statistics.
- g) Guarantee the exercise of your Habeas Data right (Queries, complaints and claims about updating, correcting, deleting or deleting data).

In any case, the information will not be processed for a period greater than that agreed with the prospect through an authorization to use their personal data counted from its collection in accordance with the legal or contractual circumstances that make it necessary the handling of the information.

In any case, the information will not be processed for a period greater than that established through the authorization granted by the prospect to use their personal data counted from its collection in accordance with the legal or contractual circumstances that make it necessary the handling of the information.





9.11 Treatment of personal data of candidates or applicants for selection processes:

LARM COLOMBIA S.A.S. collects the personal data of the candidates or applicants of the selection processes carried out by the Company and stores them in a database which is classified as reserved, and will only be disclosed with the express authorization of the owner or when a Competent Authority requests it.

The purposes for the use of the personal data of the applicants of the selection processes carried out by **LARM COLOMBIA S.A.S.** will be:

- a) Carrying out internal and external administrative management for the transparent execution of the personnel selection process.
- b) Sending communications programmed by the Company to carry out different selection tests.
- c) Corroborate any requirement that arised in the develpment of the selection process.
- d) Verification of work, academic and personal references of the applicant.
- e) Advance the recruitment process in general of the selected personnel.
- f) Carry out security studies and home visits.

All personal data that the applicant provides us will become part of a "Talent Bank", which the Company, as Responsible, may process for current and future selection processes in which the applicant's profile is appropriate. The databases where said information is stored have the necessary security measures to guarantee the total security of the data provided during the selection process. In any case, the information will not be processed for a period greater than that authorized by the applicant and for the additional time required in accordance with the legal or contractual circumstances that make the handling of the information necessary.

10. TRANSFER AND INTERNATIONAL TRANSMISSION OF PERSONAL DATA

LARM COLOMBIA S.A.S. currently does not perform International Transmission or Transfer of personal data. In the event that decides to carry out the International Transfer of personal data, in addition to having the express and unequivocal authorization by the Holder, will ensure that the action provides adequate levels of data protection and meets the requirements set in Colombia by the Statutory Law 1581 of 2012 and its regulatory decrees.

On the other hand, when **LARM COLOMBIA S.A.S.** decides to carry out International Data Transmission, it may do so without the authorization of the owners, as long as it guarantees the



security of the information, confidentiality and the conditions that regulate the scope of the data processing, in accordance with the provisions of article 10 of the Law 1581 of 2012.

Additionally, **LARM COLOMBIA S.A.S.** may carry out international transmission of personal data through different management software whose servers are located in a country other than Colombian territory; the foregoing, in order to manage all the internal processes of the Company, puede llegar a realizar Transmisión internacional de datos personales a través de diferente software de gestión cuyos servidores se encuentran ubicados en un país distinto al territorio colombiano; lo anterior, con la finalidad de gestionar todos los procesos internos de la Empresa. En todo caso, además de contar con la autorización expresa e inequívoca por parte del Titular, **LARM COLOMBIA S.A.S.** se asegurará que la acción proporciona los niveles adecuados de protección de datos y atiende a los requisitos fijados en Colombia por el Régimen de Habeas Data.

On the other hand, when **LARM COLOMBIA S.A.S.** decides to carry out an International Transfer of data other than the previously mentioned may do so without the authorization of the owners, as long as it guarantees the security of the information, confidentiality and the conditions that regulate the scope of the data processing, in accordance with the provisions of Article 10 of Law 1581 of 2012.

11. DATA OF CHILDREAN AND ADOLESCENTS

LARM COLOMBIA S.A.S. carries out processing of Personal Data of minors as USERS, for this, it guarantees that the processing is carried out with full respect for the rights of children and adolescents, which prevail in any case. Likewise, **LARM COLOMBIA S.A.S.** guarantees that at all times it will collect the respective authorizations for its treatment granted by the parents and/or their legal representatives.

In particular, the Company collects and processes the personal data of the minor children of its workers, with the sole purpose of complying with the obligations imposed by the Law on employers in relation to affiliations to the social security system and parafiscal, as well as the fulfillment of the family day (Law 1857 of 2017), and in particular to allow the enjoyment of the fundamental rights of children to health, recreation and the right to a family.

In any case, **LARM COLOMBIA S.A.S.** will collect, when appropriate, the respective authorization from their legal representatives for their treatment, always bearing in mind the best interests of the



minor and respect for the prevailing rights of children and adolescents enshrined in article 44 of the Political Constitution of Colombia.

12. PROCEDURE FOR THE ATTENTION OF INQUIRIES, CLAIMS AND REQUESTS, AND MECHANISMS TO EXERCISE THE RIGHTS OF THE HOLDERS

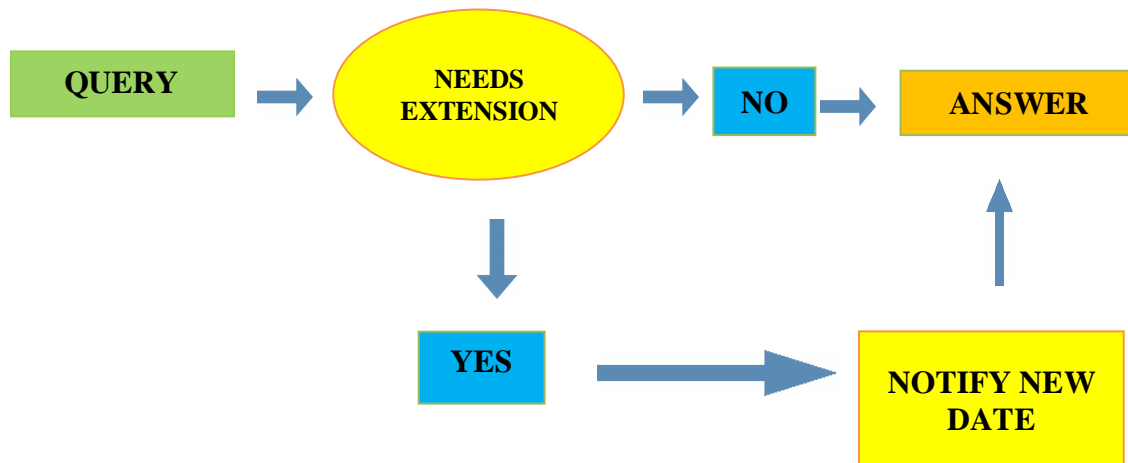
The Holder, his successors in title, his representative and/or proxy, or whoever is determined by stipulation in favor of another; could exercise its rights by contacting us through written communication addressed to the area in charge of personal data protection in the Company, **CUSTOMER SERVICE AREA**. The communication may be sent to the following email: autorizacion.datos.personales@larmcolombia.com or through written communication filed at the following address: Carrera 14 No. 99 – 33 Piso 4, Edificio Torre REM, Oficina 403 of the city of Bogotá – Colombia.

12.1 Queries

The personal information of the Holder that rests in the databases of **LARM COLOMBIA S.A.S.** may be consulted and the Company will be responsible for supplying all the information contained in the individual record or that is linked to the identification of the applicant.

Once the query is received by the Company, it will be answered within a maximum term of **ten (10) business days** from the date of receipt of the query.

When it is not possible to attend the consultation within said term, the interested party will be informed, stating the reasons for the delay and indicating the new date on which such consultation will be attended, which in no case may exceed **five (5) business days** following upon expiration of the first term.





12.2 Claims

When it is considered that the information contained in a database of **LARM COLOMBIA S.A.S.** it must be corrected, updated or deleted, or when the alleged breach of any of the duties contained in the Habeas Data Law is noticed, a claim may be filed with **LARM COLOMBIA S.A.S.** which will be processed under the following rules:

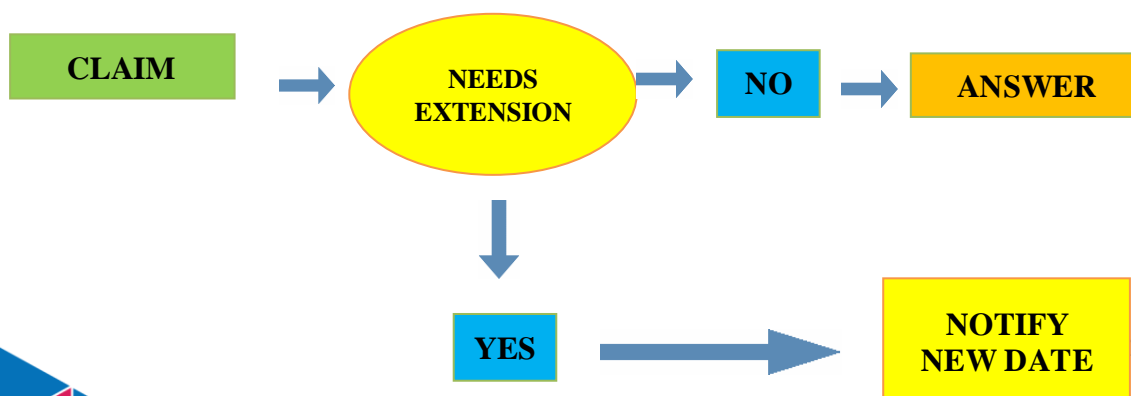
1. The claim will be made by written communication addressed to **LARM COLOMBIA S.A.S.** with the identification of the Holder, the description of the facts that give rise to the claim, the address, and accompanying the documents that you want to assert.

If the claim is incomplete, the interested party will be required within five **(5) days** after receipt of the claim to correct the faults. After two **(2) months** from the date of the request, without the applicant submitting the required information, it will be understood that the claim has been withdrawn.

In the event that **LARM COLOMBIA S.A.S.** receives a Claim for which it is not competent to resolve it, the Company will transfer it to the appropriate person within a maximum term of **two (2) business days** and will inform the Holder.

2. Once the complete claim is received, the Company will include in the respective database a legend that says "**claim in process**" and the reason for it, within a term not exceeding **two (2) business days**. The Company will keep said legend in the data object of discussion until the claim is decided.

3. The maximum term to address the claim will be **fifteen (15) business days** from the day following the date of receipt. When it is not possible to address the claim within said term, the Company will inform the Holder of the reasons for the delay and the new date on which his claim will be addressed, which in no case may exceed **eight (8) business days** following the due date of the first term.





MINIMUM CONTENT OF THE APPLICATION

The requests submitted by the owner in order to make a query or claim about the use and handling of their personal data must contain minimum specifications, in order to provide the owner with a clear and consistent response to what was requested. The application requirements are:

- a) Be addressed to **LARM COLOMBIA S.A.S.**
- b) Contain the identification of the Holder (Name and Identification document).
- c) Contain the description of the facts that motivate the query or claim.
- d) The matter of the request.
- e) Indicate the notification address of the Holder, physical and/or electronic (e-mail).
- f) Attach the documents that you want to assert. (Especially for claims).

In the event that the query or claim is presented in person, the Holder must express their written request or claim without any formality other than the requirements in the previous point.

12.3 Procedural requirement

The Holder, his successors in title, his representative and/or proxy, or whoever is determined by stipulation in favor of another; may only file a complaint with the Superintendencia de Industria y Comercio for the exercise of its rights once it have exhausted the Consultation or Claim process directly with the Company.

12.4 Request for updating and/or rectification

LARM COLOMBIA S.A.S. will rectify and update, at the request of the owner, that information that is inaccurate or incomplete, according to the procedure and the terms indicated above, for which the Owner must submit the request according to the channels provided by the Company, indicating the update and rectification of the data and in turn must provide the documentation that supports such request.

13. Revocation of the authorization and deletion of the data

The Owner may revoke at any time the consent or authorization given for the processing of their personal data, as long as there is no impediment enshrined in a legal or contractual provision.



Likewise, the Holder has the right to request to **LARM COLOMBIA S.A.S.** the deletion or suppression of its personal data when:

- a) Considering that they are not being treated in accordance with the principles, duties and obligations set forth in current regulations.
- b) They are no longer necessary or relevant for the purpose for which they were obtained.
- c) The time for the fulfillment of the purposes for which they were obtained has been fulfilled.

Such suppression implies the total or partial elimination of the personal information, in accordance with the request of the owner in the records, files, databases or treatments carried out by **LARM COLOMBIA S.A.S.**

The cancellation right is not absolute and therefore **LARM COLOMBIA S.A.S.** may deny revocation of authorization or deletion of personal data in the following cases:

- a) The Holder has a legal or contractual duty to remain in the database.
- b) When the elimination of data hinders judicial or administrative actions related to tax obligation and prosecution of crimes or the updating of administrative sanctions.
- c) The data is necessary to protect the legally protected interests of the owner; to carry out an action based on the public interest, or to comply with an obligation legally acquired by the owner.

14. MODIFICATION OF POLICIES

LARM COLOMBIA S.A.S. reserves the right to modify the Personal Data Treatment and Protection Policy at any time. However, any modification will be communicated in a timely manner to the owners of the personal data through the usual means of contact ten (10) business days prior to its entry into force.

In the event that a holder does not agree with the new General or special Policy and with valid reasons that constitute a reasonable cause for not continuing with the authorization for the processing of personal data, the Holder may request the Company to withdraw of his information through the channels indicated in Chapter 12. However, the Holders may not request the withdrawal of their personal data when the Company has a legal or contractual duty to process the data.



15. NOTICE OF PRIVACY

The Privacy Notice is the physical, electronic document or in any other format known or to be known, which is made available to the Owner for the processing of their personal data. Through this document, the Holder is informed of the information regarding the existence of the information treatment policies that will be applicable, the way to access them and the characteristics of the treatment that is intended to be given to personal data.

16. Scope and content of the Privacy Notice

The Privacy Notice, at a minimum, must contain the following information:

- a) The identity, address and contact details of the Data Controller.
- b) The type of treatment to which the data will be subjected and its purpose.
- c) The general mechanisms arranged by the person in charge so that the Holder knows the information treatment policy and the substantial changes that occur in it. In all cases, you must inform the owner how to access or consult the information treatment policy.

17. POLICY CHANGES

LARM COLOMBIA S.A.S., reserves the right to review and/or modify this Personal Data Processing Policy at any time.

LARM COLOMBIA S.A.S. will notify via email of any changes to this Policy. When substantial modifications are made to it, said notice will indicate the date from which the new Policy will apply. When the change refers to the purposes of the treatment, a new authorization will be requested from the holders to apply them.

18. AUTHORITIES REQUIREMENTS

LARM COLOMBIA S.A.S., will cooperate with the competent authorities to guarantee compliance with the laws, in terms of data protection, copyright, fraud prevention and other matters.

The Holders expressly authorize **LARM COLOMBIA S.A.S.** to provide any personal information about them, in order to comply with any requirement of the competent authority, and in order to cooperate with the authorities to the extent that we discretionally deem necessary and appropriate of an illegal act, infringement of the rules of the Consumer Statute, infringement of intellectual or industrial property rights, or other activity that is illegal or that may expose **LARM COLOMBIA S.A.S.**, to any legal liability.



19. NATIONAL LEGISLATION IN FORCE AND APPLICABLE JURISDICTION

This Policy is governed by the laws of the Republic of Colombia and by the provisions of Law 1581 of 2012, its regulatory decree and other regulations that modify, repeal or replace them.

20. VALIDITY

This Policy is effective as of March 2021.

The databases will have a validity equal to the period in which the purpose or purposes of the treatment are maintained in each database, or the period of validity indicated by a specific legal, contractual or jurisprudential cause.

The Personal Data Treatment Policy and the Privacy Notice of **LARM COLOMBIA S.A.S.**, will be communicated to the holders through email or physical means.