

PERSONAL INFORMATION TREATMENT POLICY / LOGYCA BUSINESS GROUP

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PERSONAL INFORMATION TREATMENT POLICY / LOGYCA BUSINESS GROUP

The following policies and procedures adopted in this internal manual will apply to the usage of the personal information found in the databases of the named organizations: LOGYCA / ASOCIACION, LOGYCA / SERVICIOS SAS and Fundación LOGYCA / INVESTIGACION, which belong to LOGYCA BUSINESS GROUP those who act in quality of managers and/or attendants of the treatment of these personal data.

NORMATIVE FRAME

The 15th article of the Colombian political Constitution consecrates, in favor of all the citizens, the right to know, update and rectify the information that has been collected about them in databases and in public or private entities files. At the same time, it orders that in the collection, treatment and circulation of data, freedom and other guarantees consecrated in the Constitution must be respected.

In accordance with the valid disposals in matter of Habeas Dates, the Statutory Law 1581 of 2012 and its Statutory Decree 1377 of 2013 to be precise, LOGYCA BUSINESS GROUP informs its policies of treatment of the collected information and the mechanisms adopted for its protection.

The Statutory Law 1581 of 2012, which dictates general disposals for the personal data protection, establishes the minimum conditions that any of the entities of the LOGYCA Business Group must guarantee for the legitimate personal data treatment of the members, users, customers, providers, employees and any another person.

Especially, the literal k) of the article 17 of the same law which forces the managers of the personal data treatment to adopt an internal manual of policies and procedures to guarantee the suitable fulfillment of the quoted law and especially, the attention of queries and catchwords.

The Law 1273 of 2009 establishes that it incurs in the crime of breaching personal data the one who "without being empowered for this, for his/her own benefit or of a third, obtain, compile, embezzle, offer, bandage, exchange, send, buy, intercept, spread, modify or employ personal codes, personal data contents in files, archives, databases or similar means".

The entities of the LOGYCA BUSINESS GROUP are committed to respect and guarantee the rights of the associated members, users, employees, shareholders, contractors, providers and thirds in general. For this reason and in accordance with the article 18 literal f of the referred law 1581 and its statutory decrees that complement it, the entities adopt the following manual of policies and procedures for information treatment, of compulsory application in all the activities that involve, total or partially, the collection, storage, usage, circulation and transfer of this information being of compulsory and strict fulfillment for the LOGYCA BUSINESS GROUP, its headquarters and offices in quality of managers, as well as all the thirds that act on its behalf or that without acting as the LOGYCA BUSINESS GROUP, treat personal data as in charge by disposal of any of the entities.

Nevertheless the entities that integrate the LOGYCA BUSINESS GROUP are directly in charge of the personal data treatment and reserve the right to delegate in a third such treatment, demanding these commissioned that could be employees, contractors and third, to observe and respect these policies in the fulfillment of their functions and/ or activities still after the legal, commercial, labor or any type of bonds are finished. In the same way, they will have to keep strict confidentiality in relation with the treated data.

Any breach of the obligations and in general of the policies contained in this document has to be reported to the customer service area by dealing the numbers: +57 (1) 4270999 in Bogota, Colombia or writing to acanon@logyca.com.

Chapter 1. Generalities

1.1. Field of application

The policies and procedures consecrated in this manual will apply to the entities that integrate the LOGYCA BUSINESS GROUP. The terms and conditions here contemplated apply for any personal data registration made in person or not and/or virtually, for the linkage to any product, service or benefit that develop, provide and/or grant any of the organizations of the LOGYCA BUSINESS GROUP.

The LOGYCA BUSINESS GROUP is directly in charge of the personal data treatment; however, it reserves the right to delegate in a third such treatment demanding likewise to the commissioned, the attention and implementation of the contours and ideal procedures for the protection of the personal data and the strict confidentiality of them.

2. Definitions

For effects of the interpretation and application of the policies and procedures contained in the present regulation, it is important to take into account the following concepts:

1. Privacy warning: verbal or written communication granted by the responsible and addressed to the owner of the personal data, by which is informed about the policies of treatment of his/her information, its applicability, the way to access it and the purposes of the treatment that it is meant to be given to the personal data.

2.Owner's authorization: previous expressed and informed consent of the owner of the data to carry out the treatment of his/her personal information. That authorization must be obtained and preserved by any means to be consulted later.

3. Database: Organized personal data that could be object of treatment.

4. Personal data: Any piece of information that can be linked or associated to one or several defined or determinable people, natural or juridical. The personal data can be public, half public/private or totally private.

5.Public personal data: Described by the law like such, it is not a private data or half public half private information. It is a data without reservation contained in documents and public registers, gazettes and official bulletins and judicial sentences properly executed, they are not subjected to reservation and the relative to the civil state of the people.

This data can be obtained and offered without reservation or without mattering if it does allusion to general information, private or personal.

6. Private personal data: Information that by its' intimate or reserved nature is only a matter of interest to its owner.

7. Half private / half public personal data: Information that does not have an intimate, reserved or public nature and its knowledge or disclosure may be a matter of interest not only to its owner but to a sector, group of people or the society in general. Example: Credit and Financial Data, commercial or service activity or data related to social security services.

8.Sensitive personal data: Affects the privacy of the owner. Its undue use can generate his/her discrimination, as the data that reveals his/her racial or ethnic origin, political orientation, religion or philosophical convictions, if they belong to unions, social organizations of human rights or that promote interests of any political party, that guarantee the rights or political parties of opposition, as well as the health, the sexual life and the biometrics data (footprints dactilares, photos, videos).

9. Treatment responsible parties: natural or juridical person, public or private, that by itself or in association with others decides on the database and/or the treatment of the data.

10. In charge of the treatment: natural or juridical person, public or private, that by itself or in association with others does the treatment of the data on behalf of the responsible party.

11. Owner of the data: Refers to the natural or juridical person whose personal data are object of treatment.

12.Treatment of the data: Any operation or group of operations effected on personal data, such as the collection, storage, use, circulation or suppression.

13.Complaints: Request from the owner of the data, a person or a group of persons authorized by him/her or by the law, to correct, update or suppress his/her personal data or to revoke the permission in cases established in the law.

14. Customer service leader: it refers to the person designated by LOGYCA BUSINESS GROUP, that has the responsibility of surveillance and control of the personal data protection policies application, under the orientation and the contour of the security committee.

15. Transfer: Operation by which the responsible or the personal in charge of the data sends it to another person or entity inside the country (national transfer) or outside (international transfer).

16.Transmission: Personal data treatment that involves the transmission of it inside the country (national transmission) or out of Colombia (international transmission), which is intended to the realization of a treatment by the personal in charge of the data in account of the responsible.

17.Members: Natural or juridical people who have been admitted like members of LOGYCA / ASOCIACIÓN, and have interest in the development, implantation, promotion, use and control of the products' identification system, coding and communication for the information exchange. Members will be able to have one of the following categories: Associated, Ascribed and Honorific Associated.

18. Associated: Any member of LOGYCA / ASOCIACIÓN who have the qualification of industrial and traders.

19. Ascribed: Any member of LOGYCA / ASOCIACIÓN that without having the quality of industrial company and/or commercial is interested in the activities that GS1 Colombia develops.

20. Honorific Associated: natural or juridical people that, by his/her merits and the special services loaned to the association, have been distinguished with such condition by the General Assembly or the Management Council of LOGYCA / ASOCIACIÓN.

21. Users: they are the natural or juridical people that use any one of the services loaned by the entities of LOGYCA BUSINESS GROUP.

1.3. PERSONAL DATA TREATMENT PRINCIPLES

LOGYCA BUSINESS GROUP will apply the following specific principles, which constitute the rules to be followed in the collection, handle, use, treatment, storage and exchange, of personal data:

1.3.1. RESTRICTED ACCESS AND CIRCULATION PRINCIPLE: In accordance with the legal disposals, the data operated by LOGYCA BUSINESS GROUP, its access and circulation will be restricted in accordance with the nature of the data and with the permissions given by the owner of the data or other planned people in the valid norms.

The treatment is attached to the limits that derive of the personal data nature, the constitutional and legal disposals, limits that have been collected in this manual. The treatment of the data can be only held by the owner and/or authorized personal by law.

The personal data, except for those of public nature, will not be available on the internet or in any other massive communication media, unless the access can be technically controlled to offer a restricted knowledge to the owners or to an authorized third party. For these purposes, the obligation of LOGYCA BUSINESS GROUP will be as a media and not as a result.

2. Confidentiality principle. All the people that take part in the treatment of personal data, not the public nature ones, are forced to guarantee the reservation of the information, included after his/her relationship with any of the jobs that comprises the treatment ends, being able to only supply or communicate the personal data when this correspond to the development of the activities authorized by Law.

LOGYCA BUSINESS GROUP is engaged to conserve and maintain the personal data that can be countable, technical, commercial or of any another type supplied by the owner, strictly confidential and not revealing it to third parties.

All the people of LOGYCA BUSINESS GROUP that work at present or will work in the future for such effect in the administration and management of databases, will have to sign an additional document to his/her labor agreement to ensure such commitment. This obligation persists and will be held included after his/her relationship with any of the jobs that comprises the treatment ends.

3. Purpose principle. The personal data treatment that LOGYCA BUSINESS GROUP makes, obeys to the legitimate, informed, temporary and material purpose in accordance with the Political Constitution, the Law 1581 of 2012 and the Decree 1377 of 2013.

It guarantees the owners, the right of being self-determinate by supplying data of personal character.

4. Legality principle. The Treatment of Personal Data is a ruled activity that govern by the Statutory Law 1581 of 2012, the Decree 1377 of 2013 and other laws that complement, modify or derogate then.

5. Freedom principle. LOGYCA BUSINESS GROUP can treat and yield the personal data that finds stored in its databases only with the previous, express and informed consent of the owner at the moment in which his/her personal data is going to be treated.

6. Security Principle. LOGYCA BUSINESS GROUP as the responsible or/and party in charge of the personal data treatment, provides the technical, human and administrative measures necessary to award security to the registers, avoiding its adulteration, loss, query, use or unauthorized or fraudulent access.

7. Transparency Principle. LOGYCA BUSINESS GROUP guarantees to natural or juridical people, personal data owners, that he/she will be able to obtain at any time, without restrictions, information about the existence of data that concern him/her and that are stored in its databases under the parameters established in the article 21 of the Statutory Decree 1377 of 2013.

8. Veracity/Quality Principle. The veracity and quality of the collected personal data is guaranteed by each one of the owners of it, remaining LOGYCA BUSINESS GROUP exempted of any type of responsibility on behalf of its quality.

Chapter 2. Considerations for the management, treatment and security of the information.

LOGYCA BUSINESS GROUP has the administrative structure, the procedures and technological infrastructure required to guarantee the exercise of the constitutional and legal rights in matter of Habeas Dates. In particular to ensure the owed attention of requests, queries, complaints and relative catchwords to data protection and for the user's identification and authentication like owner's identity validation mechanisms to make him/her the only person that can know, update, rectify and suppress personal information through the service channels that will be later detailed.

All the channels have qualified personnel for the exert of his/her functions and equally with the necessary control systems so that the novelties of personal information that the users request remain documented and can be object of tracking. They will deliver personal data only to the following people:

- a). the owner of the data, his/her heirs or legal representatives.
- b) To authorized people by the owner of the data.
- c) To legally authorized people by court order.

In this last case, the following guidelines need to be taken into account:

-That the public or administrative entity justify his/her application indicating the bond between the need of obtaining the data and the fulfillment of his/her constitutional or legal functions.

-That with the delivery of the data informs to the public or administrative entity that he/she will fulfil the duties and obligations that imposes him/her the Law 1581 of 2012 as responsible of the data treatment.

Chapter 3. Rights of the information owners.

LOGYCA BUSINESS GROUP is engaged to respect and guarantee the following rights of the data owners:

- a) Access, know, update and rectify his/her personal data.
- b) For the effects, it is necessary to previously establish the identification of the person to avoid that third unauthorized parties access to the data of another person.
- c) Obtain a copy of the permission granted by them in quality of owners of the data.
- d) Know the usage that LOGYCA BUSINESS GROUP has given to his/her personal data.
- e) Consult his/her personal data and make complaints that guarantees his/her rights to the protection of his/her personal data following the guidelines established in the law and in the present policies.
- f) Suppress the personal data when the Industry and Trade Superintendence have determined that LOGYCA BUSINESS GROUP has incurred in contrary behaviors of the Constitution or to the law 1581 of 2012.
- g) The owner of the data will not be able to revoke the permission and/or request the suppression of the data, when a legal or contractual duty exists and imposes him/her the duty to remain in the database or archive of the responsible party.
- h) Present complaints by infringements of the law to the Industry and Trade Superintendence.

LOGYCA BUSINESS GROUP in fulfillment of the norms on personal data protection, will point out the procedures and minimum requirements for the exercise of the rights of the owners of the information.

Chapter 4. Duties of LOGYCA Business Group.

Applicable rules.

4.1. LOGYCA BUSINESS GROUP as the responsible for the personal data treatment. LOGYCA BUSINESS GROUP has established the following general rules for the protection of personal databases:

- a) Obtain and use the personal data that in effect is required for the development of its object and to attend properly the relation that is established with the data owner, so that it will avoid requesting extraneous information to said purposes.

Such personal data corresponds to its members or associated, collaborators, providers, administrators, allies and in general those natural or juridical people which LOGYCA BUSINESS GROUP is related with.

b) When requesting the permission required to the personal data owner, LOGYCA BUSINESS GROUP:

- Will inform in a clear and sufficient way the users, the purpose of the collection and the rights that assist him/her by virtue of the permission granted.

- It will obtain the permission form previous to the treatment of the personal data, as late as at the moment of the collection of such information. It will define the media to properly maintain and later consult the permission given.

c) Guarantee the user, in all time, the plenary and effective exercise of the Habeas data rights in which he/she can know, update or rectify his/her personal data.

d) Inform the user the usage given to his/her personal data as requested.

e) Obtain a NEW AUTHORIZATION from the owner of the data, in case that LOGYCA BUSINESS GROUP requires to use personal data with a different purpose to the one previously informed and authorized. The only exception of this obligation is, if according to the law, the new usage is reasonably predictable by the owner of the data, in the frame of his/her relationship with LOGYCA BUSINESS GROUP.

f) Adopt and incorporate to its process, mechanisms so that the owners of the personal data that is being treated, can know, consult, update, rectify and suppress their data and can exert their rights to revoke the permission, whenever it is pertinent, in accordance to the agreement pointed in the present policies.

g) Observe the principles of veracity, quality, security and confidentiality in the distinguished terms in this manual of policies.

h) Conserve the information under the necessary security conditions to prevent its adulteration, loss, query, use, unauthorized or fraudulent access.

i) Supply the party in charge of the treatment only the personal data that is authorized to be supplied to third parties.

j) Guarantee that the given information to the personnel in charge of its treatment, is truthful, complete, exact, up to date, provable and comprehensible.

k) Communicate promptly all the novelties concerning the data that has been previously supplied to the party in charge of the treatment.

l) Demand respect to the conditions of security and privacy of the owner's information to the party in charge of the treatment at all times.

m) Inform to the party in charge of the treatment whenever the is being discussed in behalf of the owner.

n) Look after the personal data confidentiality. That information must be known and handled exclusively by the LOGYCA BUSINESS GROUP's authorized collaborators. The duty of the collaborators reservation about the personal data access / treatment extends after the activity made or the relationship held ends.

o) Guarantee the personal data owner that any third party (providers or contractors) with access to the confidential information will look after its security and also be responsible for it.

p) Inform to the competent authorities in the terms given by the Law, any relevant situations of the personal data administration that is object of treatment.

q) Conserve the files or databases that contain personal data by the period that the law demands it or allows it. The databases validity will be tied to the exercise of the social object of LOGYCA BUSINESS GROUP.

Without prejudging the previous quote, the minimum period of conservation of the owners personal data will correspond to the end of the term of his/her legal or contractual relation with it, or the one that is required by LOGYCA BUSINESS GROUP to fulfil with its obligations or that is necessary for the owner of the data to exert his/her rights in the frame of the nature of the relation that links them.

r) Look after the correct registration of the data under the actual regulatory terms that has personal information and that are object of treatment.

s) Guarantee the implementation so that the policies and procedures planned by LOGYCA BUSINESS GROUP in this manual are spread and its modifications are included in a proper and opportune way.

t) Adjust the procedures so that the consults or complaints of the owners of the data are attended on time in a clear and a simple way, and in all cases in a term that will not be able to exceed the expressed in the valid normativity. LOGYCA BUSINESS GROUP will look after the sufficiency and clarity of the answers to such queries or complaints.

u) The management is responsible for the implementation of these policies.

4.2. BUSINESS GROUP LOGYCA as the responsible for the personal databases treatment

If LOGYCA BUSINESS GROUP makes the treatment of the data for another entity or organization (manager of the treatment) it will have to fulfil the following duties:

a) Verify that the responsible for that treatment is authorized to supply to the BUSINESS GROUP personal data that will treat like a commissioned.

b) Guarantee the owner, the plenary and effective exercise of the right of habeas data at all times.

c) Conserve the information under the necessary security conditions to prevent its adulteration, loss, query, use, unauthorized or fraudulent access.

d) Make the update, rectification or suppression of the data conveniently.

e) Update the information reported by the data treatment manager within the next five (5) business days counting since the reception of the data.

f) Process the queries and the claims stated by the owners of the data in the distinguished terms according to the present policies.

- g) Register in the database the legend "procedure's demand" as it is established in the present policy.
- h) Insert in the database the legend "information in judicial discussion" once competent authority notifies it on judicial processes related with the quality of the personal data.
- i) Abstain to circulate information that is being controversial by the user and whose blockade have been ordered by the Industry and Trade Superintendence.
- j) Allow the access to the information only to the authorized people by the user or empowered by the law for that effect.
- k) Inform the Industry and Trade Superintendence whenever any infringement of the security code is presented and a risk on the administration of the users information may exist.
- l) Fulfil the instructions and requirements given by the Industry and Trade superintendence.

4.3. Secret and confidentiality owe: LOGYCA BUSINESS GROUP LOGYCA guarantees and demands to all person that take part in any phase of the treatment of the data of private personal character, the professional secret, concerning them and to the duty to save them, obligations that will remain still after finalizing his/her contractual relations with its entities.

The breach of the secret duty will be sanctioned according to what is intended in the internal work manual and the valid legislation.

Chapter 5. Information treatment policies and owner's rights guarantees

1.Owner's permission

LOGYCA BUSINESS GROUP will request to the owner of the data previously the permission for the treatment his/her personal data by any media that allows the usage of it as a proof. That authorization can be part of a wider document as, for example, an agreement or a specific document (format, form, agreement extension, etc.) if needed.

The data treatment purpose's description will be informed through the same specific document or annex detailing:

- a)The treatment that his/her personal data would have and the specific purpose of them.
- b) The rights that assist him/her as the owner of the data.
- c)The web page, email, customer service call center where he/she can formulate queries and/or complaints to the manager or responsible for the data treatment.

1. Means to grant the authorization.

The authorization can be recorded in a physical or electronic document, in a data message, on the internet, websites, in any another format that allow the guarantee of its later consult, or through an ideal technical or technological mechanism that allows the client to manifest or obtain his/her consent through a click or double click, so that it is possible to conclude in an unambiguous way, that without the acceptance of the owner of the data, it could have never been captured and stored in the database.

The authorization will be generated by LOGYCA BUSINESS GROUP and will be put to the owner's disposal in advance and previously of the data treatment.

2. Proof of the authorization.

LOGYCA BUSINESS GROUP will use its mechanisms to implement and adopt the prone and necessary actions to maintain the registers and ideal technical or technological mechanisms from when and how the authorizations were obtained from the owner of the personal data to its treatment.

To fulfill the previous quote, physical files can be established, or electronic repositories can be made on a direct way or through third parties hired for such purpose.

3. Cases that do not need authorization.

There are some cases where there is no need of an authorization from the data owner:

- a) Data of public nature.
- b) Information required by a public or administrative entity in exercise of its legal functions or by court order.
- c) Medical or sanitary urgency cases.
- d) Information treatment authorized by the law for historical, statisticians or scientists ends.
- e) Data related to people civil registration.

5.2. Policies to guarantee the exercise of the owner's rights

LOGYCA BUSINESS GROUP will look after the owner of the data so that they can always exert their rights in relation to the treatment of their information. To keep in mind:

5.2.1 Right to access the information.

In order to facilitate to the users to access to their own information, LOGYCA BUSINESS GROUP as established channels to make queries and report novelties. Through these roads their rights will be guaranteed.

In the exercise of this right the owners will be able to:

- a) Know the effective existence of the treatment that their personal data are being subjected to.
- b) Access to their personal data.
- c) Know the treatment circumstances of their personal data and each and every one of the purposes that justify this treatment.

Only the personal data owners, with a previous accreditation of their identity, legitimacy or personality of their representative, will have right to such disposal and access.

The accredited owners will access to their data through the defined channels formulating queries by fulfilling the requirements established in this chapter.

5.2.2 Queries.

The personal data owners will be able to consult the information of personal character that repose in any of the LOGYCA BUSINESS GROUP's databases.

In consequence, the query right would be guaranteed according to law 1581 of 2012 exclusively on the private personal data, supplying to the owners of these personal data the content information in each one of the corresponding databases and that remains under their control.

The accredited data owners can consult their data through the channels that will be defined down below and can only be transferred by the customer service area.

5.2.2.1. Query presentation rout and form

The query channels that can be used are:

- a) Web page; www.gs1co.org virtual office/shopping section, with a previous registration of the user and later access with user and password.
- b) Web page; www.logyca.com/contactenos
- c) Customer service line.

LOGYCA BUSINESS GROUP will establish authentication measures that allow the identification of the personal data owner that is making the consult in a safe way.

The query needs to contain a minimum of information to be processed:

- Names and surnames of the data owner.
- Identification number (ID);
- Owner's location;
- Description of the application or query
- Media to receive the answer;
- Name of the person that is requesting the information, if it differs from the data owner, he/she has to attach the required documents that allow him/her to act in his/her name;
- Signature of the requesting person.

2. Query procedure times

Regardless of the implemented mechanism for the attention of the query applications, these will be transacted in a maximum term of ten (10) business days counting since the date of its reception.

Whenever a query application cannot be attended before the mentioned term, the interested person has to be informed of the reasons why the query has not been solved before the term expiration, which in no case can exceed the following five (5) business days from the expiration of the first term.

3. Query costs

The owner of the data will be able to consult his/her personal data at least once each month on calendar or every time that substantial modifications of the information treatment policies are made and that motivate new queries.

For queries which periodicity is bigger than one by month calendar, LOGYCA BUSINESS GROUP will be able to charge the owner the sending, reproduction or certification costs.

5.2.3 Rectifying and updating data rights.

The data owners or their representatives, who consider that the contained information in charge of LOGYCA BUSINESS GROUP or that repose in its databases has to be object of rectification, correction, update or suppression, or whenever a presumptive breach of the data protection duties has been warned can present a complaint.

LOGYCA BUSINESS GROUP has full freedom to enable mechanisms that facilitates it the exercise of this right, as long as they benefit the personal data owner.

The responsible area of this procedure will be the Customer service area exclusively.

5.2.3.1 Complaints presentation forms and ways

All the complaints presented by the data owner needs to have an evidence of its procedure. Thus LOGYCA BUSINESS GROUP establishes as a written way to its formal presentation sending the procedure to the email web@logyca.com and/or web@gs1co.org.

A number of identification or a ticket will be set to the sent procedure that will have as an object to identify it and its presentation date to get to notify the disclaimer its posterior tracking way.

If the one who presents the complaint is the data owner, he/she will have to take into account the following presentation requirements:

- Written communication with a clear detail of his/her request.
- A copy of the identification document

If the one who makes the application is a third representative and he/she will have to fill the following requirements:

- Written communication with a clear detail of the requested.
- Authorization letter or document authenticated that accredit him/her as a representative.
- A copy of the identification document of the data owner and of the authorized party.

The presented claim will have to contain as minimum:

- Names and surnames of the data owner.
- Identification number (ID);
- Owner's location;
- Description of the application or query

- Media to receive the answer;
- Name of the person that is requesting the information, if it differs from the data owner, he/she has to attach the required documents that allow him/her to act in his/her name;
- Signature of the requesting person.

In case that the claim is not complete, it will require to the owner of the data or the interested party, to correct the mistakes within the next five (5) business days counting since the reception date. After (1) month from the requesting date without a presentation of the required information by the data owner, it will be understood as he/she has relinquished from the claim.

If LOGYCA BUSINESS GROUP is not the competent entity to solve the claim, it will be transferred to who correspond in a maximum term of two (2) business days if the new responsible is identifiable and the interested party will be informed of the situation so that he/she can track or identify the entity to claim to clearly.

Once the complete claim has been received, LOGYCA BUSINESS GROUP will include a qualification of “claim in process” in its databases and its cause in a term not longer than two (2) business days. This qualification will be kept until the claim is solved.

2.Claims procedure times

The maximum term to attend a claim will be fifteen (15) business days counting since the following day of its reception. When it is not possible to attend the requested in that term, the interested party will be informed, expressing the reasons of delay and pointing the date in which the request will be attended. This date can not exceed eight (8) business days following the first expiration term in no cases.

3.Disagreement with the claim’s answer

To give a pertinent, complete and sufficient answer to the presented claim, LOGYCA BUSINESS GROUP guarantees that it will make a complete verification of the observations effected in the claim ensuring the review of all the information to make sure that it is complete, pertinent and sufficient.

If despite this, there is not compliance with the issued answer, the one who have presented the claim will be able to request a reconsideration directly to LOGYCA BUSINESS GROUP, fulfilling again the clear-cut steps in this procedure. The interested can only be able to elevate complaints to the Industry and Trade Superintendence once the formality claim is exhausted regarding LOGYCA BUSINESS GROUP.

5.2.2.4 Claim procedure’s costs

The data owner will be able to present his/her claim for free.

5.2.4 Suppression data rights.

The personal data owner has the right to request the suppression or elimination of his/her personal data at all times. Regarding this, the following situations have to be taken into account:

- a) That the data is not being treated according to the principles, duties and planned obligations in the valid personal data protection regulation.
- b) That they are no longer necessary or pertinent for the purpose for which they were collected.
- c) That the necessary period for the fulfillment of their ends have exceeded.

This suppression involves the elimination or secure, total or partial deletion, of the personal information in accordance with the requested by the data owner in the registers, archives, databases or treatments made by LOGYCA BUSINESS GROUP.

The right of suppression is not an absolute right. LOGYCA BUSINESS GROUP as the responsible for personal data treatment can deny or limit the suppression exercise when:

- a) The data owner has the legal or contractual duty to remain in the database.
- b) The elimination of data hinders judicial or administrative performances linked to fiscal obligations, the investigation and persecution of crimes or the update of administrative sanctions.
- c) The data is necessary to protect the legally administered interests of the owner; to make an action in function of the public interest, or to fulfil with a legally purchased obligation by the data owner.

The personal data suppression way will be free and the same as the presented for claims.

In case that the personal data cancellation results pertinent, LOGYCA BUSINESS GROUP has to make the suppression in such an operative way that the elimination do not allow the recovery of the information.

5.2.5 Right to revoke the authorization.

All the personal data owners, can revoke at any time, the consent to the treatment of this data, as long as, it is not prevented by a legal or contractual disposal.

LOGYCA BUSINESS GROUP has established simple and free mechanisms that allow the data owner to revoke his/her consent, attending to one of the two following modalities:

- a) Total: On the total of the agreed purposes, this means that the owner's personal data has to stop being treated
- b) Partial: On some of the agreed purposes as for example the ones used for advertising ends or of studies of market. In this case, LOGYCA BUSINESS GROUP will have to suspend the owner's personal data treatment partially. Other ends of the treatment that the responsible can make would be kept that the manager if the data owner has agreed or if there is an authorization.

It will be necessary that the owner of the data express if he/she needs a total or partial revocatory whenever he/she is making the application of revocatory of consent, and if it is a partial revocatory he/she will have to indicate which treatment he/she is not satisfied with.

The revocatory right is not an absolute right and LOGYCA BUSINESS GROUP as the responsible of the personal data treatment, can deny or limit the exercise of the same when:

- a) The data owner has the legal or contractual duty to remain in the database.
- b) The elimination of data hinders judicial or administrative performances linked to fiscal obligations, the investigation and persecution of crimes or the update of administrative sanctions.
- c) The data is necessary to protect the legally administered interests of the owner; to make an action in function of the public interest, or to fulfil with a legally purchased obligation by the data owner.

5.2.5.1 Formalities and roads to applicate for the authorization’s revocatory

The formalities for the authorization revocatory will be for free and will employ the same roads and procedures that for the claim’s presentation.

5.2.6 Revocatory attention terms

The maximum term to attend a claim will be fifteen (15) business days counting since the following day of its reception. Whenever it is not possible to attend the requested in the said term, the interested party will be informed, expressing the reasons of the delay and pointing the date in which the request will be attended. This date can not exceed eight (8) business days following the first expiration term in no cases.

5.3. Data protection in agreements

In the labor agreements, LOGYCA BUSINESS GROUP LOGYCA has included clauses which aims to authorize on a previous and general way the treatment of personal data related with the execution of the agreement, that includes the collection, modification or correction authorization of the owner’s personal data in future moments.

It has also included the permission so that some of the personal data, in case given, can be delivered or yielded to a third with agreements with LOGYCA BUSINESS GROUP LOGYCA as a service provider for the realization of tasks as a contractor. In these clauses, the present manual and it location on the institutional website have been quoted to be consulted at any time.

In the external services agreements, whenever the contractor require personal data, LOGYCA BUSSINES GROUP will supply him/her that information as long as a previous and expressed permission exists from the owner of the data for this transfer.

In these cases, the thirds are in charge of the treatment of data and their agreements will include clauses that require the aims and the treatments authorized by LOGYCA BUSINESS GROUP and delimit on a precise way the usage that these thirds can give to these data, as well as the obligations and duties established in the Law 1581 of 2012 and the Statutory Decree 1377 of 2013, including the measures of necessary security that guarantee at all times the confidentiality, integrity and availability of the information of personal character to the responsible for the treatmet.

LOGYCA BUSINESS GROUP on its behalf at the moment that it receives data of a third and act as the responsible of the treatment personal character data, verifies that the purpose, or purposes, of the treatments authorized by the owner or allowed by legal or contractual causes its valid and that the purpose content is related with the cause to receiving the mentioned personal

information from the third, as it is the only way for LOGYCA to be empowered to receive and treat that personal data.

5.4. Special treatment of some personal data

LOGYCA BUSINESS GROUP has norms and procedures that guarantee that only highly described and ideal personal will handle the sensitive databases fulfilling the medical protocols for handling this information.

5.4.1 Security cameras

a) LOGYCA BUSINESS GROUP uses diverse means of video surveillance installed in different internal and external places of its headquarters or offices.

b) LOGYCA BUSINESS GROUP informs of the existence of these mechanisms by the diffusion of announcements of video surveillance in visible places.

c) The collected information will be used for security purposes and surveillance of the goods, offices and people that are on the headquarters. This information can be employed like proof in any type of process in front of any type of authority and organization with subjection and fulfillment of the applicable norms.

d) The images can only will be treated when they are suitable, pertinent and do not exceed in relation with the field and the determinate legitimate and explicit purposes that have justified the installation of the cameras.

e) In any case, the usage of video surveillance systems will be respectful protecting the personal privacy right. The images will be conserved by the necessary time according to the purpose for which they were collected.

LOGYCA BUSINESS GROUP has special measures of technical and management type necessary to guarantee the security of the personal data and to avoid its alteration, loss, treatment or unauthorized access, such as access control, enciphered of data, enciphered communications according to the security levels and measures for the treatment of it.

5.4.2 Treatment of the information, security levels and measures:

LOGYCA BUSINESS GROUP or any one of the organizations that conform it, will be able to conserve the personal data of the owners of the information in databases situated in Colombia or abroad, fulfilling with the purpose authorized by the data owner, making its greatest efforts to keep the information safe, guaranteeing its integrity, veracity and confidentiality.

LOGYCA BUSINESS GROUP has computer security policies and norms and one of its aims is to attain that the information does not lose its availability, integrity and confidentiality, also to support LOGYCA BUSINESS GROUP in the fulfillment of its normative obligations of protection of the information, regarding the legal order and the internal one.

The computer security management is based on the following policies, they have been all adopted by the legal frame that applies to them:

a) Operation security policies

- b) Enciphered information policies.
- c) Privacy and confidentiality of the internal information policies (or the information that is held by a third party)
- d) Awareness, training and cultural management policies.
- e) Contingency plan to hold the operation and continuity of the business
- f) Policies of physical access to the information.
- g) Copies and recovery of the information policies
- h) Adoption of safe development guideline policies
- i) Management of active of information.
- j) Safe management of login information.
- k) Management of security incidents.
- l) Management removable media.
- m) Security risks management.
- n) Audit and monitory management.
- o) Control within the information transference.

Furthermore, a MANUAL OF PROCEDURE's has been adopted which facilitates the implementation of the information security system management in LOGYCA BUSINESS GROUP.

All the security measures that LOGYCA BUSINESS GROUP has is to focus on the protection of the information. These measures allow to have a control over the employee's access to the information and to modify or change, erase, adulterate, delete that information and/or personal data according to the assigned profiles. LOGYCA BUSINESS GROUP classifies the data in accordance with its criticality and establishes the security measures to ensure its protection.

Regarding the personal data protection LOGYCA BUSINESS GROUP will procure to establish appropriate security levels and measures to guarantee a reasonable way of confidentiality, integrity and availability of the satisfied personal data as it is established by Industry and Trade Superintendence. Those established security measures will be of strict fulfillment for LOGYCA BUSINESS GROUP as responsible for the treatment of the data.

LOGYCA BUSINESS GROUP will be able to transfer or transmit the owners personal data total or partially to any one of organizations that integrate the Business Group and other entities authorized in accordance with the Colombian legislation for the realization of activities and provision of services, as well as to its employees, contractors, providers, distributors and/or advisers, only for provision of services or the execution of a social object of the respective organization, they will be forced to give treatment to these personal data as the managers of it and according to the purposes and usage planned in the present policies. They can also transfer and/or transmit this personal data to any company buyer, as well as to any subsidiary and/or

division or business of LOGYCA BUSINESS GROUP or to any one of the companies that conforms this Business Group.

5.5. 25 Personal data international transfer.

When the personal data is being sent or transferred to another country, it will be indispensable to have the permission of owner of the information that is object of transference. Except that the law says the contrary, the existence of that permission is already quoted to effect the international circulation of data. Accordingly, before sending personal data to another country, the manager will have to verify that the previous, expressed and unambiguous permission of the owner of the data exists and that he/she allows the transmission of his/her personal data.

That personal data transference its only made with the third parties that LOGYCA BUSINESS GROUP have a contractual, commercial and/or juridical bond with, in the cases in that the user request the services in countries in which the presence of LOGYCA BUSINESS GROUP exists and a previous approval of the responsible of the database according to the clauses.

Likewise, a previous authorization of the Delegate of Personal Data protection has to be obtained through the Industry and Trade Superintendence, whenever it has foreseen to make international transfers of data to countries that do not provide a true level of protection. This permission will be only granted if they obtain suitable guarantees like the agreements based on the clauses that are approved by the SIC, or the Biding Corporate Rules.

Chapter 6. Personal data treatment – managers in LOGYCA Business Group.

LOGYCA BUSINESS GROUP designates the Customer service area like the manager of the personal data treatment, as it is the dependency that will receive, process and channel the distinct applications received fulfilling the function of personal data protection, and will process the applications of the data owners, in the terms, deadlines and conditions established in this manual and by the valid regulations for the rights exertion of accessing, querying, certifying, updating, suppressing and revocating as it is referred on the valid regulation of personal data protection.

Chapter 7. Contact information.

In the event that you consider that LOGYCA BUSINESS GROUP gave a contrary use as authorized and to the applicable laws, you will be able to contact us through a communication geared towards to:

Area: Customer service

Customer service leader: Vanessa Luna

hluna@logyca.com

Personal Data protection email:

habeasdata@logyca.com

Phone numbers: +57 (1) 4254704 - 4254711

Chapter 8. Privacy warning

LOGYCA BUSINESS GROUP informs that the privacy warning of personal data treatment can be consulted in <http://www.logyca.com>.

Chapter 9. Data protection policies and information handle modification and/or update.

Any substantial change in the treatment policies is going to be communicated in a timely manner to the data owners through the usual contact methods and/or through the website www.logyca.com.

The communications will be sent in a minimum period of ten (10) business days before implementing the new policies and/or substantial update of the same.

Chapter 10. Present Manual validity.

The validity of this policies starts since September 2016.