DATA PROTECTION AND PROCESSING POLICY

INCONEXION SAS

DISCLOSURE AND ENTRY INTO FORCE

DIRECTED TO: Clients, Users, Employees, Companies, Distributors, Consumers, Suppliers, Contractors and Interested Parties (Internal and External) External).

SUBJECT: Adoption of the Data Processing and Protection Policy Personal. It is reported that in compliance with laws 1266 of 2008, 1581 of 2012, 2157 of 2021 and the regulatory Decrees, INCONEXION SAS has adopted the Data Processing and Protection Policy Personal, which you can find out about through the official website www.inconexion.com.co, at the main headquarters located at Calle 49a # 81 – 35. Of 201, Medellín - Antioquia, Colombia, or request it by email reportes@inconexion.com.co for your knowledge, acceptance and compliance.

INCONEXION SAS has within its business policy the adoption of legal and conventional requirements, for this reason it has adopted the This Personal Data Treatment and Protection Policy, which will be applicable to data recorded in any database, bank of data and files that are linked to the company INCONEXION SAS, whose owner of the personal data is a natural person, and is not within the exclusion from treatment according to article 2.2.2.25.1.2. Of decree 1074 of 2015.

InConexion
BPO

INCONEXION SAS guarantees to all owners of personal data the power

know, update, rectify the information contained in databases or

files that are owned by you, in addition to being able to exercise the rights

constitutional rights that assist him, such as those enshrined in article 15 and

20 of the Colombian Political Constitution of 1991, especially those that

could be of a Sensitive Nature according to art. 5

of Law 1581 of 2012.

This Personal Data Protection and Processing Policy enters into force

effective as of July 1, 2019 and will be modified by

Constitutional, Legal and Jurisprudential mandate.

NOTIFY AND COMPLY

Cordially

_____
JOSE PATRICIO PELAEZ SUAREZ

LEGAL REPRESENTATIVE

InConexion SAS

JAIRO ANDRES MUÑOZ V.

LEGAL DIRECTOR

InConexion SAS

DATA PROTECTION AND PROCESSING POLICY

INCONEXION SAS

On July 1, 2019, in compliance with laws 1266 of 2008,

1581 of 2012, 2157 of 2021 and the regulatory Decrees, by which it is

dictate provisions for the treatment and protection of personal data,

INCONEXION SAS, adopts this policy in order to give

compliance with current regulations and define the framework for the attention of

queries and complaints about the processing of personal data

personnel who collect, use, circulate and store in accordance with the Law.

This policy for the protection and processing of personal data will be

Applicable to all databases obtained by different means

INCONEXION SAS, by virtue of the development of its corporate purpose and activities

economic and in compliance with the special regulations of the sector of

contact center through calls, digital channels as well as the

Purchase and sale of products for contact centers and consulting

for implementation, among other related activities in your chamber

trade.

1 IDENTIFICATION OF THE PERSON RESPONSIBLE FOR THE PROCESSING OF THE INFORMATION:

COMPANY NAME: INCONEXION SAS NIT: 900837653 - 1 Address: Calle 49a

81 – 35, office 201, Telephone: (604-3222114) Email:

databases@inconexion.com.co Website: www.inconexion.com.co **1.1.**

Data controllers: In accordance with the CONSIDERATIONS

CONSTITUTIONAL and LEGAL expressed in this policy, it is defined

as a person in charge of any natural or legal person, public or private, who

by itself or in association with others, carry out the Data Processing

personal on behalf of INCONEXION SAS, an entity that for the purpose of Carrera 2

No. 3 – 40, Municipality of Jericó, Antioquia

Telephone: 3222114, website: www.inconexion.com.co, Cell phone: 3160188352

strengthen strategies that allow enhancing the interoperability of the

company with other companies and non-profit institutions, delegate in

a third party personal data collected, stored, used and

circulated for specific purposes such as storage in the

computer system and the website, with each MANAGER having the

linking through the signing of a specific contract or agreement for

the activity or work to be performed, in addition to the protection agreement

personal data; when the delegation to be carried out is by mandate of law

As it constitutes the electronic invoice, subscription to it is optional.

personal data protection agreement, in both cases, the agreement

or contract that aims to regulate the protection of data between the

RESPONSIBLE and the MANAGER must have as their objective the link

of the responsibility of both parties to comply with the terms

given in this policy and the authorization granted by the owner of the

data. Among the people who act as DISCONNECTION MANAGERS

SAS identified at the time of adoption of this policy are:

MARTA USUGA AND JAIME ANDRES ARBOLEDA as heads of the area of

Company accounting, LABORUM SAS legally constituted company

legally represented by Dr. REINALDO ECHEVERRI in charge

of the Quality and Health and Safety Management System Advisory Service in the

work, SEFTY SAS company in charge of the entrance exams,

newspapers and retirement to the company's staff, Security System

responsible information SIGLO XX1 legally constituted company

legally represented by the engineer MAURICIO AGUDELO as well as

Responsible for Cloud Database Storage and Support

software and hardware technician.

2 LEGAL FRAMEWORK. For the purposes of data protection and processing

personal are identified the special rules of the sector that imply

directly or indirectly carry out the processing of personal data,

which should be taken into account in this policy as a

legal obligation. The regulations are of national, departmental and

technical standard, as follows: • Political Constitution, article 15 and 20. • Law 1266 of 2008

Statutory • Law 1581 of 2012 • Regulatory Decrees 1377 of 2013 and 886

of 2014 • Circular 02 of 2015 • Sole Decree No. 1074 of 2015 • Resolution

No. 76434 of 2012 • Regulatory Decrees 1727 of 2009 and 2952 of 2010, •

Sentences C – 1011 of 2008, and C - 748 of 2011, of the Constitutional Court •

Decree 1115 of June 29, 2017, as well as the normative provisions

dictated by Law 2157 of 2021, better known as the Erase and Clean Up Law.
New Account.

3 DEFINITIONS. For the purposes of a better understanding of this

policy for the protection and processing of personal data in accordance with the

current legislation, the definitions taken from the

Current regulations in Colombia governing data protection

personal data of natural persons in relation to the treatment within the

limits given in the legal concepts and definitions: a. File: Set

of data recorded as a single storage unit, which

contain personal data. b. Authorization: Prior consent,

express and informed of the Owner to carry out the Data Processing

personal data, which are obtained at the time of data collection. c.

Privacy Notice: Verbal or written communication generated by the

responsible, addressed to the Owner for the processing of his/her personal data,

through which you are informed about the existence of the policies of

information processing that will be applicable to you, the way to access

the same and the purposes of the treatment that is intended to be given to the data

personal. d. Database: Organized set of personal data that

are subject to processing. e. Personal data: Any information

linked or that may be associated with one or more natural persons

determined or determinable. f. Public data: This is data that is not

semi-private, private or sensitive. They are considered public data, among others

Others, data relating to the marital status of persons, their profession or trade

and their status as merchants or public servants. By their nature, the

Public data may be contained in, among others, public records,

public documents, official gazettes and bulletins and court rulings

duly executed that are not subject to reservation. g. Data

Sensitive: Sensitive data is understood to be data that affects privacy.

of the Owner or whose improper use may lead to discrimination, such as

that reveal racial or ethnic origin, political orientation, beliefs

religious or philosophical, membership in unions, social organizations,

of human rights or that promotes the interests of any party

political or that guarantee the rights and guarantees of political parties of

opposition, as well as data relating to health, sexual life, and data

biometrics. h. Employee: Natural person who is linked

labor with INCONEXION SAS i. Person in charge of the Treatment: Person

natural or legal, public or private, by itself or in association with others,

carry out the processing of personal data on behalf of the person responsible for the

Treatment. j. Habeas Data and Personal Data Protection: Right

Fundamental Constitution regulated in article 15 of the Constitution

Colombia's 1991 policy, which states that "All people have

right to personal and family privacy and to a good name, and the State

must respect them and make them respect them. Likewise, they have the right to

Know, update and rectify the information that has been collected

about them in the databases and in the archives of public entities and

private. In the collection, processing and circulation of data, the following will be respected:

freedom and other guarantees enshrined in the Constitution." The Habeas

Data and the Protection of Personal Data are Fundamental Rights of

inalienable and inalienable character of every person and as such must

respected, protecting freedom, the right to self-determination, honor and privacy. k.

Boys, girls and adolescents: ARTICLE 3. SUBJECTS

RIGHT HOLDERS. For all purposes of this law, the following are subject to the

Holders of rights are all persons under 18 years of age. Without prejudice

According to the provisions of article 34 of the Civil Code, a child is understood to be

Girl refers to people between 0 and 12 years old, and teenager refers to people

between 12 and 18 years old. Any person, for the purposes of this privacy policy,

processing of personal data of any person who is a representative

legal, meaning who exercises parental authority, custody, curatorship and/or

tutoring. l. Supplier: Any natural or legal person who supplies goods or

services that INCONEXION SAS requires for its operation. m. Owner:

Natural person whose personal data are subject to processing. n.

Processing: Any operation or set of operations on data

personal, such as collection, storage, use, circulation or

deletion. or. Transfer: Data transfer takes place when the

responsible and/or in charge of processing personal data, located

In Colombia, sends the information or personal data to a recipient, who

in turn is responsible for the treatment and is located within or outside the

country. p. Transmission: Processing of personal data involving the

communication thereof within or outside the territory of the Republic of

Colombia when it is intended to carry out a treatment by the

commissioned on behalf of the person responsible. q. Deletion: This is the name given to the

action that the Owner of the personal data requests from the person responsible and/or

data controller, in exercise of his right to freedom and

purpose of your information. r. Data Controller: Person

natural or legal, public or private, by itself or in association with others,

decide on the database and/or the processing of data. s. Revoke:

It is understood that the Owner of the information may exercise the right to

revoke the authorization given for the processing of personal data by

part of the person responsible and/or in charge at any time, provided that

when there is no outstanding contractual link that prevents its

immediate deletion as provided for by the revocation. t. Visitor:

Any person who enters the facilities and does not have a link

labor with INCONEXION SAS or. Client: Natural or legal person who

access the products and/or services of INCONEXION SAS 4. Principles:

General principles that are covered by current regulations in Colombia

to ensure the protection of personal data by means of

physical or digital collection of INCONEXION SAS, in the development of its

corporate purpose: a. Principle of legality in data processing:

Data processing is a regulated activity, which must be subject to

to the current and applicable legal provisions governing the subject matter. b.

Principle of purpose: The activity of processing personal data that

is carried out in INCONEXION SAS, or to which you have access, will obey

a legitimate purpose in accordance with the Political Constitution of

Colombia, which must be reported to the respective Data Owner

personal data. c. Principle of freedom: The processing of personal data

can only be carried out with the prior, express and informed consent of the

Holder. Personal data may not be obtained or disclosed without prior consent.

authorization, or in the absence of a legal, statutory, or judicial mandate that

release consent. d. Principle of truthfulness or quality: The

Information subject to the processing of personal data must be truthful,

complete, accurate, up-to-date, verifiable and understandable. The use of information is prohibited.

Processing of partial, incomplete, fractional data or data that induce

a error. e. Principle of transparency: The processing of personal data by

INCONEXION SAS, must guarantee the Holder his right to obtain in

any time and without restrictions, information about the existence

of any type of information or personal data that is of interest to you or

Ownership. f. Principle of restricted access and circulation: The treatment of

Personal data is subject to the limits arising from the nature of

these, of the provisions of the law and the Constitution. Consequently, the

Treatment may only be carried out by persons authorized by the Owner and/or

by the persons provided for in the law. Personal data, except for information

public, may not be available on the Internet or other media

disclosure or mass communication, unless access is technically possible

controllable to provide restricted knowledge only to the Holders or

third parties authorized under the law. For these protection purposes

of personal data, the obligation of INCONEXION SAS will be of means.

g. Security principle: Information subject to processing by

INCONEXION SAS, must be managed with the technical and human measures

and administrative measures that are necessary to ensure the security of the records

avoiding its adulteration, loss, consultation, use or unauthorized access or

fraudulent. h. Confidentiality principle: All persons, whether or not they are

linked, by contract to INCONEXION SAS, that administer, manage,

update or have access to information of any kind that is

find in databases, are obliged to guarantee the confidentiality of the

information, for which reason they undertake to preserve and maintain

strictly confidential manner and not disclose to third parties, all the

information that they may become aware of in the execution and exercise of their

functions; except when it concerns activities expressly authorized

by the data protection law. This obligation persists and will continue to be

Even after the end of your relationship with any of the jobs you do.

includes the Treatment.

4 AUTHORIZATION. The Holders of the personal data provided to

INCONEXION SAS by any written means, whether physical or digital, accept

the treatment of these and authorize their use in accordance with the terms

of this policy. Authorizations will be managed and inventoried by

INCONEXION SAS In case data collection will be carried out

Through the video surveillance system, the treatment of these will be

authorized through access to the company's offices, after giving prior notice to the

entry of the facilities of INCONEXION SAS The authorization of the

collection of SENSITIVE DATA such as biometric data is carried out by

each data holder through authorization, in which it is expressed that his/her

Authorization for treatment will be voluntary, with a validity period

of conservation until the termination of the relationship with the data owner or

failing that, until the time indicated regarding relations

special ones regulated by contracts, regulations or the law. Being the

authorization the prevalent proof document for the treatment of

personal data authorized by the owner in favor of INCONEXION SAS,

They agree to use the information of the owner with authorization

prior, express and informed through mechanisms and/or means of

collection such as: physical or electronic document (data message:

Internet, email, telex, fax, website, verbally

(in person or by telephone), or through any other format or instrument

that allows its conservation and subsequent consultation, in order to prove that without the

consent of the owner the data would never have been collected and

stored in electronic or physical media. **4.1 PRIVACY NOTICE** The

Privacy notice is adopted, complying with article 2.2.2.25.3.2.

and 2.2.2.25.3.3. of decree 1074 of 2015 with the objective of regulating the form

to give notice of the processing of information by those responsible

and those in charge of processing personal data, to the Owner. This Notice

It must be given by means of a document, whether in physical or digital format,

or any other known or unknown format, to indicate to the Holder

of the data, on: a. The identity, address and contact information of the

controller. b. The type of processing to which they will be subject.

the data and the purpose of this. c. The rights of the Owner. d. The

general mechanisms arranged by the person responsible so that the Holder

Learn about the policy on the treatment and protection of personal data and the

substantial changes that occur in it. In all cases, it must

inform the Owner how to access or consult the data processing policy

information. e. The optional nature of the response to questions

on sensitive data.

5 CASES IN WHICH AUTHORIZATION IS NOT NECESSARY. INCONEXION SAS,

will not require prior authorization from the Owner to carry out any

Processing of Personal Data in the following cases: a. Information

required by a public or administrative entity in the exercise of its powers

legal functions or by court order. b. Data of a public nature. c.

Medical or health emergency cases. d. Information processing

authorized by law for historical, statistical or scientific purposes. e. Data

related to the Civil Registry of Persons

6 DATABASES SUBJECT TO PROTECTION AND PROCESSING: DISCONNECTION

SAS at the time of adopting the personal data protection policy

identified the generation of Databases containing Personal Data

and Files of its property, leaving the databases unidentified

impersonal that are NOT regulated by Law 1581 of 2012 and decrees

regulatory. In turn, INCONEXION SAS identifies sub-bases that

They depend on the main database, therefore they do not require registration.

independent as indicated in this policy. For the proper

diligence regarding databases and files with data content Carrera 2 No. 3 – 40,

Municipality of Jericó, Antioquia

Telephone: 3222114, website: www.inconexion.com.co, Cell phone: 3160188352

personal, the name of the databases is identified below

data, types of data, duration, regulations if associated and others

characteristics expressed below: NAME OF THE BASE OF

DATA AND DURATION OF PROCESSING DATA IT CONTAINS AND TYPE

DATABASE NAME: No. 1. CUSTOMERS: It is understood as the

Database that is formed through the collection, storage,

Use and circulation of personal data obtained at the beginning of the relationship

contractual, previously or during the execution thereof, this basis of

data has its main use in the INCONEXION SAS files for the

monitoring, DATA SUBJECT OF PROCESSING: Type of

document, identification number, full name, email

email, mobile and/or landline telephone, company name, location address and

Rut. If it is a legal entity, in addition to the previous data that

apply if there is a certificate of existence and legal representation.

Billing, emails sent, contacts, follow-up to

incidents, meetings, strategies, products and attached documents that have been

sent to clients. DURATION: The data contained in this

database are of indefinite duration or, failing that, until the

elimination indicated by general and special regulations or

until such time as its removal is requested by the owner of the

information and it can be eliminated in the cases contemplated in the Law

1581 of 2012, article 8, 9 and 11. The permanence of the data in INCONEXION

SAS that is regulated by general and special regulations

As for the duration, the stay must be complied with.

It is understood that at any time and moment the

deletion by the owner of the information or by a third party with the authority and

representation to do so as provided by Law 1581 of 2012, article 8, 9 and 11.

TYPOLOGY: This database contains public data,

semi-private and sensitive. MEANS OF PROCESSING: Physical and Automated DATABASE

NAME: No. 2. WEBSITE CONTACT: It is understood

as a Database that is formed through collection,

storage, use and circulation of data associated by the user to the

time to send a message through the official site

https://inconexion.com.co/portal/contacto that must be attended to by

INCONEXION SAS DURATION: DATA SUBJECT OF PROCESSING: Name

full, email, phone, cell phone, city and country. TYPOLOGY:

This database contains public and semi-private data.

Eventually, depending on the content of the message expressed by the

owner will obtain private, sensitive and specially protected data.

MEANS OF PROCESSING: Automated The data contained in this database

Data are of indefinite duration or, failing that, until deletion

as indicated by general and special regulations or until the

the moment in which its elimination is requested by the owner of the information

and this can be eliminated in the cases contemplated in Law 1581 of

2012, article 8, 9 and 11. It is understood that at any time and moment

Deletion may be required by the owner of the information or by a

third party with the authority and representation to do so as provided by law

1581 of 2012, article 8, 9 and 11. However, the permanence of the data in

INCONEXION SAS, which is regulated by regulations

general and special in terms of duration must comply with said permanence. DATABASE NAME:

No. 3. EMPLOYEES:

It is understood as a Database that is formed through collection,

storage, use and circulation of personal data of all

holders who are linked to the payroll process of the company INCONEXION

SAS, treatment necessary for the administration and management of the company. DURATION:

The data contained in this database are of

indefinite duration or, failing that, until the indicated elimination

through general and special regulations until the time when

required its elimination by the owner of the information and it can be

eliminated in the cases contemplated in Law 1581 of 2012, article 8, 9 and

11. DATA SUBJECT TO PROCESSING: Name, surname, type of

identification, identification number, account number and salary.

TYPE: This database contains public, semi-private and sensitive data. PROCESSING

MEANS: Automated BASE NAME

DATA: No. 3. SOCIODEMOGRAPHIC: It is understood as a Database

which is formed by the collection, storage, use and

circulation of personal data provided by the INCONEXION SAS employee as

associated personnel. DURATION: The data

contained in this database are of duration for the time of

execution of the contract or, failing that, until the elimination indicated

through general and special regulations until the time when

required its elimination by the owner of the information and it can be

eliminated in the cases contemplated in Law 1581 of 2012, article 8, 9 and

11. DATA SUBJECT TO PROCESSING: Document number, names and

Full surnames, date of birth, gender, RH, marital status,

address, landline and cell phone, email, account number

bank, banking entity, EPS, AFP, ARL, educational level, people to

position and data of the spouse if there is one. TYPOLOGY: In this database

data contains public, private, semi-private and sensitive data. MEDIUM

PROCESSING: Automated DATABASE NAME: No. 3.

SOCIODEMOGRAPHIC PROFILE: It is understood as a Database that is

It is formed by the collection, storage, use and circulation of

the personal data provided by the INCONEXION SAS employee as associated

personnel. DURATION: The data contained in this

database are of duration for the duration of the contract execution or

failing that, until the elimination indicated by regulations

general and special until the time when its elimination is required by the

owner of the information and it can be eliminated in the cases

contemplated in Law 1581 of 2012, article 8, 9 and 11. DATA SUBJECT OF

PROCESSING: Document number, full names and surnames,

date of birth, gender, RH, marital status, address, landline telephone number and

cell phone, email, bank account number, banking institution,

EPS, AFP, ARL, educational level, dependents, stratum, type of housing,

health status, if you are a smoker, if you consume alcoholic beverages, what you do

in free time, type of contract, position, length of position, and average income. TYPOLOGY:

This database contains data

public, private, semi-private and sensitive. MEANS OF TREATMENT:

Automated DATABASE NAME: No. 6. CONTRACTORS AND

SUPPLIERS: It is understood as a Database that is made up

through the collection, storage, use and circulation of data

personal data of all INCONEXION SAS contractors and suppliers

treatment necessary for the communication, administration and management of the

company. DURATION: The data contained in this database are of

indefinite duration or, failing that, until the indicated elimination

through general and special regulations until the time when

required its elimination by the owner of the information and it can be

eliminated in the cases contemplated in Law 1581 of 2012, article 8, 9 and

11. DATA SUBJECT TO PROCESSING: Name of the contractor, identification number

identification, address, telephone and email, website, Rut and professional card.

TYPOLOGY: This database contains data

public, private, semi-private and sensitive. MEANS OF TREATMENT: Automated

DATABASE NAME: 1. No. 10. CCTV: It is

understood as a Database that is formed by the

collection, storage, use and circulation of personal data of

people who are collected through the surveillance system by

part of INCONEXION SAS in its own or managed offices.

DURATION: The data contained in this database is of duration

defined from 15 to 20 calendar days, except when an incident occurs and

has been requested through competent authority as a means of

test. DATA SUBJECT OF PROCESSING: Image by video and

eventually photography TYPOLOGY AND MEANS OF TREATMENT In this

database contains semi-private data. MEANS OF PROCESSING

Automated

7 PURPOSES AND PROCESSING TO WHICH THE DATA WILL BE SUBJECTED

PERSONAL. Personal data (public, semi-private,

private, sensitive and specially protected data may be collected,

stored, used and processed by INCONEXION SAS, directly

in its capacity as CONTROLLER or through third parties as MANAGERS,

for one or more of the purposes described according to the needs

of treatment and circulation through collection, storage,

use, circulation, updating, deletion and elimination in compliance with

the terms and conditions set forth in this policy for the

execution of the following PURPOSES: a. Customer Management Pursuant to the

development of its corporate purpose in the contact center sector through

calls, digital channels as well as the purchase and sale of

products for contact centers and consulting for

implementation, INCONEXION SAS, must collect, store, treat and

circulate the personal data of each of the clients belonging to

the lines of business through which it operates in pursuit of the

different administrative, commercial, legal and accounting processes, in

attention to good practices that ensure good service in favor

of the holders as clients. Data processing is carried out

permanent transmission mode when it comes to those in charge of

the storage of information as described in the section

No.1. INCONEXION SAS reserves the right to retain the information

of the client for evidentiary and accounting purposes, minimum of (1) one year counted

from the request for deletion that THE CLIENT makes to the

RESPONSIBLE by revoking the authorization. b. Cookies and

links: www.inconexion.com.co are technological mechanisms of

communication property of INCONEXION SAS, this does not make them

Responsible for the content of websites other than the official site

www.inconexion.com.co which the user can access through

the established links and declares that in no case will it proceed to

examine or exercise any type of control over the content of other sites

of the network. Nor will it guarantee the technical availability,

accuracy, veracity, validity or legality of sites other than its property.

INCONEXION SAS declares that it has adopted all necessary measures

to avoid any harm to users of its official website

www.inconexion.com.co and INCONEXION SAS, which may arise

from browsing your website, being exonerated from all

responsibility for any damage that the user may suffer due to the

Internet browsing. INCONEXION SAS recognizes that a Cookie is

a file that links to the operation of the official website

www.inconexion.com.co and has the functionality of downloading in its

computer when accessing certain web pages, allowing

Through these, information and data about the users are stored and retrieved.

browsing habits as a user or of your computer and eventually

such as user recognition data, functionalities that allow

INCONEXION SAS to be more efficient in providing the service, therefore,

informs the user that he has the possibility of avoiding the use of Cookies

by configuring your browser to inform you of the receipt of

cookies, and you may, if you wish, prevent them from being installed on your hard drive.

hard, you can also exercise your right to choose by accepting or not the

Website Cookies Policy. c. Supplier and Contractor Management

INCONEXION SAS will process personal data for the following purposes:

purposes related to the development of the contractual management process under

the current regulations for the supply of goods or services required

for the operation and execution of the commercial object linked to

INCONEXION SAS d. Human Resources In the development of its processes

INCONEXION SAS collects information from natural persons for the

selection of personnel for the purpose of carrying out a study of resumes and

subsequent contracting. The collection carried out by INCONEXION SAS is

It is carried out by direct and voluntary sending of the resume by

job applicants to the email address authorized for this purpose, by

referred or through contact us on the official website

https://inconexion.com.co/portal/contacto, all of these previously

authorizing and empowering INCONEXION SAS to process these,

in the selection process. Likewise, at the time of hiring, the

Personal data will be processed for the purpose of complying with the

contractually established obligations of a labor nature. In addition,

The employee acknowledges that INCONEXION SAS may evaluate its employees.

employees to reduce the risk associated with personnel linked to

compliance with the occupational health and safety system. In any case,

who is in the selection process or is already linked

authorizes the use of your personal data by INCONEXION SAS for

confirm the relevant information provided by the candidate and/or

linked. e. Security in facilities (Photos and videos) Registration by

the video surveillance system with image and voice capture of the

people who are in the facilities of INCONEXION SAS, are

carried out with the objective of ensuring the safety of the company, of the

job applicants, employees, contractors, general and service providers

services, residents (owners and tenants), managers, staff

of private surveillance and the general public, of any visitor to the

INCONEXION SAS facilities The data collected are

stored on our own server. f. Risk and emergency management

Carry out adequate risk management that allows us to address

timely and appropriate manner emergencies that may affect the

physical integrity of job applicants, employees, contractors,

general and service providers, residents (owners and

tenants), administrators, private and public security personnel in

general in the company's facilities that will require information

staff that allows INCONEXION SAS to analyze the occupational load

historical and know in real time the information of the holders of the

information. g. Accounting, treasury and billing The collection and

Processing of personal and/or corporate data by INCONEXION SAS

It will be carried out for the development of the different accounting processes,

treasury and billing in accordance with its corporate purpose and alliances

strategic commercial. h. Communications management: The treatment of

personal data by different means of communication such as: email

electronic, cell phone, text messages, messaging apps

snapshot, social networks, physical address and any other communication channel

communication that is known and consented to by the data owner,

will be carried out for the purposes related to the development of the management process

communications and commercial allied companies, and any other

activity that is previously known and authorized by the owner of the

data. For the process of developing commercial activities

deployed by INCONEXION SAS When it comes to data

corresponding to children and adolescents, the collection, treatment

and circulation will be authorized through the minor's legal representative.

7.1 TREATMENT AND PURPOSE OF SENSITIVE DATA: For the use, enjoyment and

functionality of the company INCONEXION SAS, could eventually

collect sensitive personal data from people with whom you

that there is a relationship, whether contractual or not, which have a special

treatment and protection, use may be made of these sensitive data

when: a. The Holder or his legal representative, meaning the person who exercises the

parental authority, custody, guardianship and/or tutoring has given his/her authorization

explicit, except in cases where the granting of a license is not required by law.

such authorization. Right of the holder based on art.

2.2.2.25.2.3. From decree 1074 of 2015. b. The treatment is necessary for

safeguard the vital interest of the Owner or his legal representative, understood

who exercises parental authority, custody, curatorship and/or guardianship and this is

finds himself physically or legally incapacitated. In these events, the

Legal representatives must give their authorization. c. When the data

are validly obtained from an entity of any nature and that

at your own risk and expense possesses personal data, the purpose of which is

political, philosophical, religious or union, as long as they refer

exclusively to its members or to persons who maintain contacts

regular due to their purpose. In these events, the data cannot be

supply to third parties without the authorization of the Owner. d. The Treatment refers

to data that is necessary for the recognition, exercise or defense of

a right in a judicial process. e. The Treatment has a purpose

historical, statistical or scientific. In this event, the following must be adopted:

measures leading to the suppression of the identity of the Holders. The

The processing of sensitive data is subject to the conditions established by the

Law 1581 of 2012 and Decree 1074 of 2015, as long as the authorization is obtained

prior, express and informed authorization of the Owner of these, which will be

obtained in writing, by physical or digital means or recording

magnetic tape, and, consequently, the evidentiary support must remain

from the moment of obtaining the authorization, from the moment of the

granting and subsequent consultation.

8 INFORMATION OF CHILDREN AND ADOLESCENTS. Data processing

of minors in INCONEXION SAS, is prohibited, except

If it is carried out with the prior, express and informed authorization of the

parents, as long as the prevalence of their

fundamental rights and unequivocally responds to the realization of the

principle of their best interest, taking into account that their actions

They must be carried out through their parents or by those who have the homeland

authority of the minor or his legal representation. The previous limitation to the

Information about children and adolescents is banned from all sources

treatment by Law 1581 of 2012, except prior authorization from the person

represent your personal rights and interests, INCONEXION SAS, will request

to these the prior, express and informed authorization for the treatment of

data of minors for the purposes described in this policy.

9 DISCLOSURE OF PERSONAL DATA AND INFORMATION. Personal data

and information may be shared without prior authorization in

the following cases regulated by law: a. Information required by a

public or administrative entity in the exercise of its legal functions or for

court order. b. Data of a public nature. c. Cases of medical urgency

or health. d. Processing of information authorized by law for purposes

historical, statistical or scientific. e. Data related to the Civil Registry

of the People.

10 RIGHTS OF THE OWNERS. In accordance with the provisions of the

regulatory framework for the protection of personal data, the Holders of the

data may at any time exercise the following rights

enshrined in Law 1581 of 2012. a. Access, know, update and

rectify your personal data in those events in which INCONEXION

SAS is responsible for the processing; the Owner may exercise this right

in the face of partial, inaccurate, incomplete, fragmented data, which

misleading, or those whose treatment is expressly prohibited

or has not been authorized. b. Request proof of the authorization granted to

INCONEXION SAS by any valid means, except in cases

defined by Law 1581 of 2012 that Authorization is not necessary. c. Be

informed by INCONEXION SAS, upon request, regarding the use that has

given to your personal data. d. Submit to the Superintendency of

Industry and Commerce complaints for violations of the provisions of Law 1581 of

2012. The Holder must take into account that he must first exhaust the

claim or consultation process before INCONEXION SAS e. Revoke the

authorization and/or request the deletion of the data when the treatment does not

constitutional and legal principles, rights and guarantees are respected.

The rights of the aforementioned Holders may be exercised by the

following persons: a. The Holder, who must prove his identity in

sufficiently by the various means made available to it

INCONEXION SAS, The legal representative, guardian, curator and/or agent of the

Holder, upon prior accreditation of representation or power of attorney. b. The

successors in title of the Owner, who must prove such status. c.

Any judicial or administrative authority, which by its legal nature

and dedication in front of the State can demand the fulfillment of one or

several or all of the rights that the Holder has. d. Another in favor of or for which

the Holder has stipulated.

11 DUTIES OF THOSE RESPONSIBLE AND/OR IN CHARGE OF DATA PROCESSING

PERSONAL DATA. INCONEXION SAS acting as CONTROLLER

or the PERSON IN CHARGE of the processing and circulation of personal data that has

obtained in one's own name, on behalf of a third party or in the name of a

third   through   he   mail   electronic with domain

basesdedatos@inconexion.com.co, the telephone line 3222114, the website

Official: www.inconexion.com.co and main physical headquarters located on Calle 49a

81 – 35, office 201, Medellín – Antioquia – Colombia, you can make the

treatment authorized by the Owner of the personal data directly or

delegate to a third party who will be in charge of data processing

personal data, which are contained in databases, data banks and files

physical and digital, with the purpose of carrying out technological procedures,

administrative and operational through plans, programs and projects

related or direct that are in charge of the company INCONEXION

SAS, especially indicating that when there are personal data of

boys, girls and adolescents, the communication channels will be those that

the company provides under the technological and security conditions that

are disclosed in this policy in a physical location of your company visible to the

Holders of personal data and previously known to the

legal representative, who exercises parental authority, custody, curatorship and/or

guardianship, of the minor since they will be subject to the data category

sensitive and specially protected, requiring greater care

to the processing of your personal data. INCONEXION SAS, in its capacity as

RESPONSIBLE and/or IN CHARGE of the treatment and circulation of data

personal must facilitate the channels of attention to natural persons

that so require, to consult, verify, rectify, modify and update

your personal data or request that the CONTROLLER or PROCESSOR do so

directly. **11.1. Duties of those responsible for the treatment.** In the

treatment and protection of personal data, will be considered mandatory

the duties prescribed in current legislation and which underpin the

processing of personal data, purposes, authorization,

treatment and circulation by the CONTROLLER, the use and application of

the communication channels that are especially identified in the design

and application of the procedures listed in section thirteen

(13) of this policy and in accordance with the regulations of Law 1581 of

2012, as follows: "Article 17. Duties of those responsible for the Treatment.

Data controllers must comply with the following duties, without

without prejudice to other provisions provided for in this law and in other

that govern their activity: a) Guarantee the Owner, at all times, the full and

effective exercise of the right of habeas data; b) Request and retain, in

the conditions provided for in this law, a copy of the respective

authorization granted by the Owner; c) Duly inform the Owner about

the purpose of the collection and the rights that you have by virtue of the

authorization granted; d) Keep the information under the conditions of

security necessary to prevent its adulteration, loss, consultation, use or

unauthorized or fraudulent access; e) Ensure that the information that

is provided to the Data Processor is true, complete, accurate,

up-to-date, verifiable and understandable; f) Update the information,

communicating in a timely manner to the Data Processor, all the

updates regarding the data that you have previously provided and

take other measures necessary to ensure that the information

provided to this is kept up to date; g) Rectify the information

when it is incorrect and communicate the relevant information to the Person in Charge of the

Treatment; h) Provide the Data Processor, as appropriate,

Only data whose processing is previously authorized

in accordance with the provisions of this law; i) Require the Person in Charge of the

Treatment at all times, respect for safety conditions and

privacy of the Owner's information; j) Process queries and claims

formulated in the terms indicated in this law; k) Adopt a

internal manual of policies and procedures to ensure adequate

compliance with this law and in particular, for the attention of queries

and claims; l) Inform the Data Processor when a certain

information is under discussion by the Holder, once it has been

the claim has been submitted and the respective procedure has not been completed; m)

Inform the Owner at his/her request about the use given to his/her data; n) Inform the

data protection authority when violations of the data protection rights occur.

security codes and there are risks in the administration of the

information of the Holders. o) Comply with the instructions and requirements that

issued by the Superintendence of Industry and Commerce." 12.2. Duties of the

Data processors In the processing and protection of data

personal, the duties prescribed in the law will be considered mandatory

current legislation and which underpin the processing of data

personal, the purposes, the authorization, the treatment and circulation to

the responsibility of the MANAGERS, the use and application of the channels of

communication that is especially identified in the design and application

of the procedures listed in numeral thirteen (13) of the

This policy and in accordance with the regulations of Law 1581 of 2012, as follows:

"Article 18. Duties of Data Processors. Data Processors

Treatment must comply with the following duties, without prejudice to the

other provisions provided for in this law and in others that govern its

activity: a) Guarantee the Holder, at all times, the full and effective

exercise of the right of habeas data; b) Keep the information under the

security conditions necessary to prevent its adulteration, loss,

unauthorized or fraudulent consultation, use or access; c) Perform

the timely updating, rectification or deletion of the data in the

terms of this law; d) Update the information reported by the

Data Controllers within five (5) business days counted

from receipt; e) Process queries and complaints made by

the Holders in the terms indicated in this law; f) Adopt a

internal manual of policies and procedures to ensure adequate

compliance with this law and, in particular, for the attention of

queries and complaints from the Holders; g) Register in the database

data the legend "claim in process" in the manner regulated in the

present law; h) Insert in the database the legend "information in

"judicial discussion" once notified by the competent authority

on judicial proceedings related to the quality of personal data; i)

Refrain from circulating information that is being disputed by the

Holder and whose blocking has been ordered by the Superintendency of

Industry and Commerce; j) Allow access to information only to those

persons who may have access to it; k) Inform the Superintendency

of Industry and Commerce when violations of the codes of

security and there are risks in the management of information of the

Holders; l) Comply with the instructions and requirements issued by the

Superintendence of Industry and Commerce. Paragraph. In the event that

the qualities of Data Controller and Data Processor concur

Treatment in the same person, compliance with the following will be required:

duties provided for each."

12 CHANNELS OF ATTENTION TO THE OWNER. The Owner or representative and/or

The Holder's representative may process requests, queries and claims of

directly, expressly, unequivocally and in writing to the data officer

INCONEXION SAS's personal data, always providing supporting documentation.

Contact details for the Personal Data Officer: Area

Responsible: Data Officer INCONEXION SAS Address: Calle 49a # 81 –

35, office 201, Medellin – Antioquia – Colombia Email:

basesdedatos@inconexion.com.co Phone: (57-4) 322114 Website:

www.inconexion.com.co.

13 PROCEDURES FOR THE EXERCISE OF THE RIGHTS OF THE OWNERS

OF THE INFORMATION: The Data Owner or his representative and/or

proxy, you can exercise your rights to consult, update, rectify,

suppress and revoke the authorization under the following procedure: The

Application must be submitted in writing, either physically or digitally, at the office

INCONEXION SAS's main office, located at Calle 49a # 81 – 35, office

201, Medellín, Antioquia, Colombia, Monday through Friday between 8:00 a.m. and 5:00 p.m.

08:00 am 05:30 pm or to the email basesdedatos@inconexion.com.co. The

The application must include the following requirements: a. Full name of the

Information Holder with respective identification. b. In case of not being

The Holder, the representative and/or agent of the Holder, must attach

proof of prior accreditation of representation or power of attorney.

c. Description of the facts giving rise to the request. d. Address and

Contact telephone number to respond to the request. **13.1 PROCEDURE**

FOR CONSULTATION 13.1.1. Objective To make known to the Owner of the information or

their successors in title the steps they must take to consult the

information about him that exists in the databases of INCONEXION SAS,

or its Managers who currently processes the personal data of the Owner. **13.1.2.**

Execution of the procedure 1. Carry out the

specific consultation through the channels provided by INCONEXION

SAS, or its managers, described in the Data Processing Policy

personal data, so that the Owner can exercise his/her rights. 2.

INCONEXION SAS, through the Personal Data Protection Officer,

responsible, among others, for handling requests, queries or complaints,

will receive the query from the Holder or successor in title and will begin the process

corresponding to respond within a period of no more than 10 business days,

counted from the date of receipt thereof. Only in the event of not being

possible to attend to the query within 10 business days, will inform the Holder

or to his successor in title, explaining the reasons for the delay, and informing him

the new date on which the query will be attended to, which may not be later than

5 business days. 3. The Holder may request from INCONEXION SAS a copy

of the consultation carried out as evidence of its completion. "ARTICLE

16. Procedural requirement. The Holder or successor in title may only raise

complaint to the Superintendence of Industry and Commerce once there is

Once the consultation or claim process has been exhausted before the Responsible Party,

Treatment or Treatment Manager". (Law 1581 of 2012). **13.2 PROCEDURE TO EXERCISE**

CLAIMS FOR CORRECTION, UPDATE, DELETION OF INFORMATION OR REVOCATION

OF THE AUTHORIZATION 13.2.1. Objective. To make known to the Owner of the information

or

to their successors in title the steps they must take to file a

claim to INCONEXION SAS, or to its Managers, when it considers

that the information contained in a database must be subject to

correction, updating, deletion, revocation of authorization; or

When they notice the alleged non-compliance of any of the duties

contained in Law 1581 of 2012. **13.2.2. Execution of the procedure.** 1.

Make the specific claim through the channels provided by

INCONEXION SAS, and described in the Data Processing Policy

personal data, so that the Owner can exercise his rights. 2. The

The claim will be made by means of a request addressed to INCONEXION SAS, 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 make

If the claim is incomplete, the interested party will be required within

within five (5) days following receipt of the claim to correct the

failures. After two (2) months from the date of the request, without

the applicant submits the required information, it will be understood that he has

the claim has been withdrawn, by mandate of the Law. In the event that the person who receives

the claim is not competent to resolve it, it will be transferred to whoever

corresponds within a maximum term of two (2) business days and will inform of the

situation to the interested party. 3. Once the complete claim has been received, it will be included

in the database a legend that says "claim in process" and the reason

of this, in a term not greater than two (2) business days. Said legend

must be maintained until the claim is decided. 4. The term

The maximum time to address the claim will be fifteen (15) business days counted

from the day following the date of receipt. When it is not possible

address the claim within said term, the interested party will be informed of the

reasons for the delay and the date on which your claim will be attended to, which in

In no case may it exceed eight (8) business days following the expiration date.

of the first term. "ARTICLE 16. Requirement of admissibility. The Holder or

The beneficiary may only file a complaint before the Superintendency of

Industry and Commerce once the consultation process has been exhausted or

claim to the Data Controller or Data Processor."

(Law 1581 of 2012).

14 SECURITY MEASURES FOR THE PROTECTION AND PRIVACY OF THE

INFORMATION. INCONEXION SAS undertakes to adopt the measures

safety courses provided by the Superintendency of Industry and Commerce

according to article 2.2.2.25.3.7. of decree 1074 of 2015 for the treatment

of personal data. Notwithstanding the foregoing, INCONEXION SAS in its

continuous improvement process establishes controls that allow in the

to the extent possible preserve the information and its content to limit the

access by unauthorized third parties. 15 MODIFICATIONS TO THIS

DATA PROTECTION AND PROCESSING POLICY INCONEXION SAS is

reserves the right to modify this policy as required for

its operation and regulatory compliance. Notwithstanding the foregoing,

In the event of substantial changes in the content of the policies

privacy and data processing will be released in its latest version

through virtual or physical means. If there are changes in what is referred to

For the purposes of the treatment, INCONEXION SAS will request a new

authorization of the Data Owner; through direct communication

Sent to job applicants, employees, contractors, suppliers

general and services, residents (owners and tenants) and in general

to the data holders that make up INCONEXION SAS If in the

term of thirty (30) business days, counted from the implementation

of any of the communication mechanisms described above,

The Owner has not contacted the Controller or Processor to request the

deletion of your personal data under the terms of this policy,

INCONEXION SAS may continue to process the data

contained in their databases for the purposes indicated.

15 NATIONAL DATABASE REGISTRY. INCONEXION SAS states,

that at the time of adoption of this policy under the

Decree 90 of January 18, 2018 is not required to carry out the

National registry of databases, but it is obliged to comply

All provisions for the processing of personal data issued

of Law 1581 of 2012 and its regulatory decrees. In accordance with the

provided for in article 25 of Law 1581 of 2012, the basis for which

will proceed in accordance with current regulations and rules

issued by the National Government through decree 886 of 2014, circular

02 of 2015, Decree 1074 of 2015, Decree 1759 of November 2016,

Circular 01 January 2017, Decree 90 of 2018 and Circular 3 August 2018

2018, to register its databases before the National Registry of

Databases (RNBD) that will be managed by the Superintendency of

Industry and Commerce. The RNBD constitutes the public directory of the databases

of data subject to Treatment that operate in the country; and that will be free

consultation for citizens.

16 ENTRY INTO FORCE. This protection and treatment policy

of personal data is effective from its publication, given on July 1st
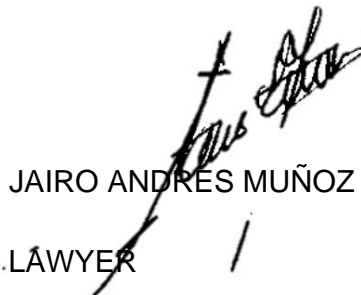
of the year 2019.

NOTIFY AND COMPLY

Sincerely

JOSE PATRICIO PELAEZ SUAREZ   JAIRO ANDRES MUÑOZ V.

LEGAL REPRESENTATIVE   LAWYER

INCONEXION SAS   InConexion SAS

ANNEX 1

MODIFICATIONS TO THE POLICIES FOR THE PROTECTION AND TREATMENT OF DATA

SAS DISCONNECTION DATA

By virtue of and by mandate of Law 2157 of 2021, better known as the Law

of a clean slate, by means of which the

Statutory Law 1266 of 2008 and general provisions of habeas corpus are issued

data in relation to financial, credit, commercial,

services and that from third countries and other provisions are issued,

INCONEXION SAS, in compliance with the standard ibidem, establishes the

following procedure when any type of claim is filed,

request, complaint or claim regarding the permanence of the reports

negatives to the databases to which they are reported

the debtors of INCONEXION SAS corporate clients, every time

that Law 2157 of 2021 establishes substantial modifications regarding

the permanence and expiration of the negative data.

FIRST. The owner of the data or information must send a request

written following the procedure referred to in section 13 of the policy

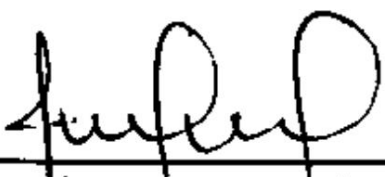for the protection and processing of data by INCONEXION SAS

SECOND. Within a maximum period of 3 calendar days, INCONEXION SAS

must give notice and share all information of the respective case to the

legitimate owner of the data and information, that is, the corporate client,

regarding the petition, request, complaint or claim that you had

knowledge.

THIRD. The legitimate owner of the information, that is, the corporate client

INCONEXION SAS must process the respective response to the request,

request, complaint or claim within the established deadlines and terms

in the Law.

FOURTH. This amendment is effective during the term of validity of the

Law 2157 of 2021, which is for one year, so it starts on October 29

2021 and ends on October 29, 2022.
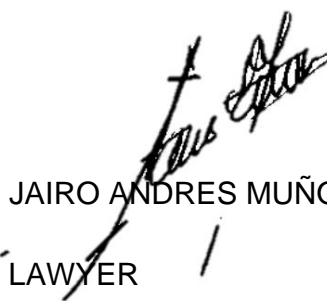
NOTIFY AND COMPLY

Sincerely

JOSÉ PATRICIO PELAEZ SUAREZ

LEGAL REPRESENTATIVE

InConexion SAS

JAIRO ANDRES MUÑOZ V.

LAWYER

InConexion SAS