

PERSONAL DATA PROCESSING POLICY

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CHANGE CONTROL

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1. OBJECTIVE

This Personal Data Treatment Policy has the purpose of regulating the collection, storage, use, circulation and deletion of personal data handled by APPINIT, likewise, it considers the mandates of Colombian Law 1581 of 2012, decrees and other regulations that complements, modifies or repeals it.

2. REACH

The Personal Data Treatment Policy of APPINIT covers all administrative, organizational and control aspects that must be complied with by managers, collaborators, contractors and third parties who have a direct relationship with the company, likewise, it will apply to all Bases Data and/ or Files that contain personal data that are subject to Treatment by APPINIT.

The policy is communicated to all clients, collaborators, third parties and the public, through the means of communication provided by APPINIT.

3. DEFINITIONS

For this policy, the definitions described in Colombian Law 1581 of 2012, Title I, Article 3 will be taken:

- Authorization: Previous, express and informed consent of the Holder to carry out the Processing of personal data.
- Database: Organized set of personal data that is subject to Treatment.
- Personal data: Any information linked or that may be associated with one or more specific or determinable natural persons.
- Responsible for the Treatment: Natural or legal person, public or private, that by itself or in association with others, carries out the Treatment of personal data on behalf of the Person Responsible for the Treatment.
- Owner: Natural person whose personal data are subject to Treatment.
- Treatment: Any operation or set of operations on personal data, such as the collection, storage, use, circulation or deletion.

4. PROCESS POLICY

4.1. Guiding Principles

APPINIT for the treatment of personal data will apply the principles defined in Colombian Law 1581 of 2012, Article 4:

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

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

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

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

e) Principle of transparency: In the Treatment, the right of the Holder to obtain from the Treatment Manager, at any time and without restrictions, information about the existence of data that concerns him.

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

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

g) Principle of security: The information subject to Treatment by the Person in Charge of Treatment to which the law refers, must be managed with the technical, human and administrative measures that are necessary to provide security to the records avoiding their adulteration, loss, consultation, use or unauthorized or fraudulent access.

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

4.2. Data processing

4.2.1. Public Data and Sensitive Data

APPINIT recognizes public and sensitive data in accordance with the provisions of Colombian Law 1581 of 2012 in Article 3, which states the following:

Public data: It is the data that is not semi-private, private or sensitive. Public data, among others, are data relating to the marital status of individuals, their profession or trade and their status as a merchant or public servant. By its nature, public data may be contained, among others, in public records, public documents, gazettes and official gazettes and duly enforceable judicial decisions that are not subject to reservation.

Sensitive data: Sensitive data is understood to be those that affect the privacy of the Holder or whose improper use may generate discrimination, such as those that reveal racial or ethnic origin, political orientation, religious or philosophical convictions, union membership, social, human rights organizations or organizations that promote the interests of any political party or that guarantee the rights and guarantees of opposition political parties, as well as data related to health, sexual life, and biometric data.

4.2.2. Sensitive Data Processing

The Processing of sensitive personal data, when such Processing is possible in accordance with the provisions of article 6 of Colombian Law 1581 of 2012, the following obligations must be met:

- Inform the owner that because it is sensitive data, he is not obliged to authorize its Treatment.
- Inform the Owner explicitly and in advance, in addition to the general authorization requirements for the collection of any type of personal data, which of the data that will be processed are sensitive and the purpose of the Treatment, as well as obtain their consent express.
- Have the authorization of the owner for the Treatment of their personal data.
- Safeguard the vital interest of the holders, if they are physically or legally incapacitated. In these events, the legal representatives must grant their authorization.

- Serve as a necessary support for the recognition, exercise or defense of a right in a judicial process.

4.2.3. Rights of children and adolescents

APPINIT prohibits the Processing of the personal data of boys, girls and adolescents, except in the case of data of a public nature, in accordance with the provisions of article 7 of Colombian Law 1581 of 2012 and when such Treatment complies with the following parameters and requirements:

- That responds and respects the best interests of children and adolescents.
- That respect for their fundamental rights is ensured.

Once the above requirements have been met by APPINIT, the Collaborators or Third Parties as legal representatives of the child or adolescent will grant the authorization before the exercise of the minor's right to be heard, an opinion that will be valued taking into account maturity, autonomy. and ability to understand the matter.

4.3. Treatment of Databases

APPINIT will ensure compliance with current and applicable regulations with respect to the National Registry of Databases and will consider the minimum information, which is set forth below:

1. Identification, location and contact data in his capacity as Responsible for the Treatment of the database.
2. Identification, location and contact data in their capacity as the Data Processor or Managers of the database.
3. Channels for the holders to exercise their rights.
4. Name and purpose of the database.
5. Way of Treatment of the database (manual and/or automated), and
6. Information Treatment Policy.

The Superintendence of Industry and Commerce, as the authority for the protection of personal data, may establish within the National Registry of Databases additional

information to the minimum provided in Decree 886 of 2014, in accordance with the powers attributed to it by Colombian Law 1581 of 2012 in literal h) of article 21.

4.4. Presumption around personal data.

APPINIT presumes that the data provided have been entered by its owner or by a person duly authorized by him, that they are correct and exact, and that they belong to a person of legal age, a presumption that is generated by the simple fact of being a user of APPINIT, given that in order to display these qualities, it is a requirement to be of legal age.

4.5. Purposes of the Treatments

APPINIT in general will use personal data according to the classification established in numeral 4.2 collected exclusively for commercial, contractual and operational purposes, related to its business lines and the strategic alliances, allies and contractual relationships that APPINIT generates and the mission. of APPINIT and/or internal administrative processes, in compliance with its mission, fixed commercial and contractual purpose, current legislation and information security, without prejudice to third parties intervening in the provision of services for the fulfilment of these purposes and/or purposes provided by APPINIT.

For this purpose, APPINIT, has adopted the appropriate security levels to the data provided by the user and/or end customer, and, in addition, it has installed all the means and measures at its disposal to avoid loss, misuse, alteration, unauthorized access and extraction thereof, including the use of encryption and hashing.

According to the above and the types of holders of sensitive data, they will have the following purposes in their treatment:

- Regarding the personal data of our Clients
- You acknowledge that APPINIT may send reciprocal communications and messages, through the communication tools provided on the website www.appinit.co in which will prevail good faith, the correct treatment and use of data for the proposed purposes, related to the operations in which the parties may be contractually bound and the duty of mutual collaboration between the User and APPINIT.

- It will send through email, text message (SMS) and/or any other means provided from the information provided by the client, the Campaigns carried out by APPINIT, as well as with information for commercial, statistical, management and of service among other purposes of data processing and the quality of services, products and operations of APPINIT or APPINIT with its allies and/or strategic partners at a commercial and operational level.
- Control access to its platform and may at any time and its sole arbitrator, order the suspension or temporary or definitive disqualification for user access to the website www.appinit.co based on the information provided.
- Within its servers APPINIT can make use of cookies, which will be installed automatically in the browser used by the user.
- Use the different services through the APPINIT website, including content and format downloads.
- Contract third parties for the materialization of the purposes proposed within this paragraph, which will have access to the personal data provided by the user, where they may only be used for the purposes described within this Policy and other documents subject to acceptance by the user. Said third parties will oversee the treatment and use of personal data and will assume the obligations and responsibilities established in the various provisions established in the legal framework on this matter.

Regarding the data of Contractors, Suppliers and Interns:

- APPINIT will use the sensitive data collected exclusively for its own and operational purposes related to internal administrative processes, in compliance with its mission, current regulations and information security management.
- Carry out directly or indirectly, the personnel recruitment processes, including the evaluation and qualification of applicants and the verification of employment and personal references.
- Develop Human Management activities, such as payroll, payroll news, occupational health and well-being activities, exercise of the employer's sanctioning power, and to make payments and other social benefits that are established in the Law and are applicable to APPINIT.
- Use the different services through the APPINIT website including content and format downloads.

- Use the information of authorized contacts in case of emergencies during working hours or during the development of the same.
- Control employee access to the employer's computer resources and provide support for their use.

Regarding the data of Control Entities:

- APPINIT will use the sensitive data collected exclusively for its own and operational purposes related to internal administrative processes, in compliance with its mission, current regulations and information security management.
- Control access to the APPINIT offices and establish security measures, including the establishment of video-monitored areas.
- Use the different services through the APPINIT website, including content and format downloads.

4.6. Rights of Clients, Collaborators and Third Parties

Clients, collaborators and third parties who have personal information registered in the databases of APPINIT, or their successors in title have the right to what is described in Colombian Law 1581 of 2012, Title IV, Article 8, which enunciates the following rights:

- a) Know, update, rectify, oppose and cancel your personal data in front of the Treatment Managers. This right may be exercised, among others, against partial, inaccurate, incomplete, fractioned, misleading data, or those whose Treatment is expressly prohibited or has not been authorized; Thus, the user will be solely and exclusively responsible for the veracity and accuracy of their personal data.
- b) Request proof of the authorization granted to the Responsible for the Treatment except when expressly excepted as a requirement for the Treatment, in accordance with the provisions of article 10 of this law.
- c) Be informed by the Treatment Manager, upon request, regarding the use that has been given to your personal data.
- d) Present before the Superintendence of Industry and Commerce complaints for infractions to the provisions of the law and other regulations that modify, add or complement it.
- e) Revoke the authorization and/or request the deletion of the data when the treatment does not respect the principles, rights and constitutional and legal

guarantees. The revocation and/or deletion will proceed when the Superintendence of Industry and Commerce has determined that in the Treatment, APPINIT as the Responsible or Person in Charge have incurred in conduct contrary to this law and the Constitution.

f) Free access to your personal data that have been subject to Treatment.

4.7. Area, Means and Procedure for the Exercise of Information Processing Rights

APPINIT assumes through the Project Manager, the role of Personal Data Protector and Information Security Officer. For this reason, the Project Manager in exercise of these functions delegates the responsibility of processing the requests of the Clients, Collaborators and Third Parties to the directors or pertinent collaborators depending on the request, for the exercise of the rights to which it refers. Colombian Law 1581 of 2012 and Decree 1377 of 2013.

Considering the above, the Holders or Owners of Information may make requests, queries and claims about the processing of their data through the following means or points of contact:

a. Contact us mailbox on the website www.appinit.co

b. email: comunicaciones@appinit.co

4.8. Duties of APPINIT according to the Quality of Responsible for the assume Treatment

APPINIT may show, depending on the contractual relationship, alliance or agreement that it develops, the quality of Responsible for Data Processing. This quality will be communicated to the user of the website or application in advance within the flow of linking and registration as well as within the respective Authorization of Personal Data. The following are the duties that it will hold depending on the quality or role that it acts in the treatment and use of the personal data provided.

- Duties as data controller

a. Guarantee the Holder, always, the full and effective exercise of the right of the Personal Data Holders.

b. Request and keep, under the conditions set forth in this law, a copy of the respective authorization granted by the Holder.

c. Properly inform the Holder about the purpose of the collection and the rights that assist him by virtue of the authorization granted.

d. Keep the information under the necessary security conditions to prevent its adulteration, loss, consultation, use or unauthorized or fraudulent access.

e. Guarantee that the information provided to the Treatment Manager is true, complete, exact, updated, verifiable and understandable.

f. Update the information, communicating in a timely manner to the Person in Charge of Treatment, all the news regarding the data that you have previously provided and adopt the other necessary measures so that the information provided to it is kept up-to-date.

g. Rectify the information when it is incorrect and communicate the pertinent to the Person in Charge of Treatment.

h. Provide to the Treatment Manager, as the case may be, only data whose Treatment is previously authorized in accordance with the provisions of Applicable Laws.

i. Require the Treatment Manager, always, to respect the security and privacy conditions of the Owner's information.

j. Process the queries and claims formulated in the terms indicated in Chapter VI of this Policy.

k. Inform the Treatment Manager when certain information is under discussion by the Owner, once the claim has been submitted and the respective procedure has not been completed.

l. Inform at the request of the Holder about the use given to their Personal Data.

m. Inform the data protection authority when there are violations of the security codes and there are risks in the administration of the information of the Holders.

n. Comply with the instructions and requirements issued by the Superintendence of Industry and Commerce.

- Duties as data processor

a. Update the information reported by the Treatment Managers within five (5) business days from receipt of the communication.

b. Process the queries and claims made by the Personal Data Holders in the terms indicated in the Applicable Laws.

c. Register in the Database the legend "claim in process" in the manner in which it is regulated in the Applicable Laws.

d. Refrain from circulating information that is being controversial by the Holder and whose blocking has been ordered by the Superintendence of Industry and Commerce.

e. Allow access to information only to people who can have access to it.

f. Inform the Superintendence of Industry and Commerce when there are violations of the security codes and there are risks in the administration of the information of the Holders.

g. Comply with the instructions and requirements issued by the Superintendence of Industry and Commerce

4.9. National and International Transmission and Transfer of Personal Data

APPINIT in the processing of personal data may transmit personal data to other databases of its own or of third parties, If there is authorization from the owner of the data at the national level and prohibits its transfer to countries that do not provide adequate levels of protection of data in accordance with the standards established by the Superintendence of Industry and Commerce, which in no case may be lower than those required by Colombian Law 1581 of 2012 from its recipients and will only be carried out when there is corresponding authorization from the Holder.

This prohibition will not apply when it comes to:

- Information for which Clients, Collaborators and Third Parties have granted their express and unequivocal authorization for the transfer.
- Exchange of medical data, when required by the Treatment of Clients, Collaborators and Third Parties for reasons of health or public hygiene.
- Bank or stock transfers, in accordance with the applicable legislation.
- Transfers agreed in the framework of international deals to which the Republic of Colombia is a party, based on the principle of reciprocity.
- Transfers necessary for the execution of a contract between Clients, Collaborators and Third Parties with APPINIT, or for the execution of pre-contractual measures as long as the Owner's authorization is obtained.

- Transfers legally required to safeguard the public interest, or for the recognition, exercise or defense of a right in a judicial process.

The provisions described on the transfer of personal data will be applicable to all personal data, including those contemplated in Colombian Law 1266 of 2008.

4.10. Validity of the General Policy for the Treatment of Personal Data and Databases

4.10.1. Validity of the General Policy for the Treatment of Personal Data

APPINIT has duly applied the Personal Data Information Treatment Policy. This document develops this policy as of June 1, 2021.

4.10.2. Validity of the Databases

The databases will have a validity equal to the period in which the purpose or purposes of the treatment are maintained in each database, or the period of validity that indicates a specific legal, contractual cause. In compliance with the above, APPINIT will keep its databases in custody.