

WOLF MÉNDEZ ABOGADOS ASOCIADOS LTDA.

Data Processing Policy and internal handbook to ensure compliance with the statutory law on personal data protection.

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Overview

WOLF MENDEZ ABOGADOS ASOCIADOS LTDA., (hereinafter **WOLF MENDEZ**) is a company engaged mainly in the provision of legal services, legal advice, representation and mandate, in connection with the field of law or other liberal professions, directly or by contracting independent professional third parties; also, the acquisition and/or representation of Intellectual Property rights of national and foreign clients.

Article 15 of the Constitution of the Republic of Colombia enshrines the right of any person to have knowledge of, update and rectify their personal data that exists in data banks or files of public or private entities. Likewise, it orders those who may have personal data of third parties to respect the rights and guarantees set forth in the Constitution when collecting, processing and circulating such information.

Statutory Law 1581 of October 17, 2012 provides the minimum conditions to perform the legitimate processing of the personal data from customers, employees, shareholders and any other natural persons. Both paragraphs k) of article 17 and f) of article 18 of this law require those controllers and processors of personal data to "*adopt an internal policy and procedures handbook to ensure compliance with this law, and especially for handling inquiries and complaints*".

Article 25 of said law states that data processing policies are mandatory and that failure to comply with them will result in sanctions. Such policies shall not enable a processing level that is lower than the one established in Law 1581 of 2012.

Chapter III of Decree 1377 of June 27, 2013 regulates some aspects concerning the content and requirements of the Data Processing Policies and Privacy Notices.

WOLF MENDEZ is committed to respecting the rights of its customers, employees, shareholders and third parties at large. Therefore, it hereby adopts the following personal data processing policy which is mandatory in all activities involving personal data processing.

Mandatory nature

These policies are mandatory and strict compliance is expected from all employees of **WOLF MENDEZ**, as well as from contractors and third parties acting on behalf of **WOLF MENDEZ**.

All employees of **WOLF MENDEZ** shall abide by and respect these policies in performance of their duties. In the absence of an employment relationship, a contract clause requiring those working on behalf of **WOLF MENDEZ** to comply with these policies must be included.

Failure to comply with said policies will result in labor sanctions or contractual liability, as appropriate. Notwithstanding the foregoing, noncompliance with these policies or undue processing of personal data will give rise to financial liabilities and damages in favor of the data subjects or **WOLF MENDEZ**.

For all purposes, this document shall serve as the internal handbook of policies and procedures as well as the data processing policies referred to in Articles 17 (paragraph k), 18 (paragraph f), and 25 (paragraph 25) of Law 1581 of 2012.

Definitions

- **Consent:** Prior, express, and informed consent of the data subject to perform the processing.
- **Query:** a request from the data subject or from those authorized by them or by law to be informed of the information on them filed in databases or archives.
- **Personal data:** Any information which are related or that can be related to one or several identified or identifiable natural persons.

These data can be classified into sensitive, public, private, and semi-private data.

- **Sensitive personal data:** Information that affects the privacy of the person or that if mishandled may lead to discrimination, such as those that reveal racial or ethnic background, political orientation, religious or philosophical convictions, membership in trade unions, social organizations, human rights organizations, or that promotes the interests of any political or political party or

that guarantees the rights and safeguards of opposition political parties, as well as data relating to health, sex life and biometric data (fingerprints, among others).

- **Public personal data:** Data classified as such by law or by the Political Constitution, and all data not classified as semi-private or private. Data contained in public documents, public records, official gazettes and bulletins and duly executed court rulings that are not subject to confidentiality, data relating to the marital status of persons, their profession or trade and their status as merchants or public servants, among others, are public. Personal data existing in the Companies Registry of the Chambers of Commerce are public (Article 26 of the Code of Commerce).

These data may be obtained and offered without any reservation and regardless of whether they refer to general, private or personal information.

- **Private personal data:** Data that, due to its intimate or reserved nature, is only relevant to the data subject. Examples: merchants' ledgers, private documents, information extracted from the domicile inspection.
 - **Semi-private personal data:** Semi-private data is data that is not intimate, reserved or public in nature and whose knowledge or disclosure may be of interest not only to its subject but also to a certain sector or group of persons or to society in general, such as, but not limited to, data relating to the fulfillment or non-fulfillment of financial obligations or data pertaining to relations with social security entities.
- **Processor:** the person who performs data processing on behalf of the data controller.
 - **Claim:** a request from the data subject or from those authorized by them or by law to correct, update, or erase their personal data.
 - **Controller:** the person who decides, among others, collection and purpose of processing. For example, the company that owns the databases or the information system containing personal data.

- **Data subject:** The natural person that the data relate to.
- **Processing:** Any operation or set of operations performed on personal data, including, but not limited to, collection, storage, use, dissemination, or erasure of such information.
- **Transmission:** Personal data processing involving their flow within (domestic transmission) or outside Colombia (international transmission), with the purpose of being processed by the Processor on behalf of the Controller.
- **Transfer:** Data transfer occurs when the Controller and/or processor, located in Colombia, sends the information or personal data to a receiver who, in turn, is a processing controller located inside or outside the country.

Principles for processing personal data.

Personal data processing shall be performed in compliance with the general and specific rules on the matter, and for the purposes permitted by law. The following principles shall be applied in a harmonious and comprehensive manner during the development, interpretation and enforcement of this policy:

Principles for collecting personal data.

- **Freedom:** Unless otherwise provided by law, data can only be collected with the prior, express, and informed consent of the subject. Personal data shall not be obtained or disclosed without prior consent of the subject, or without a legal or judicial mandate relieving such consent.

The data subject shall be informed in a clear, sufficient and prior manner about the purpose of the information provided and therefore, no data may be collected without specifying their purpose.

The principle of freedom shall be observed both for data collected through forms or templates as well as for data included in attachments or documents delivered by data subjects to **WOLF MENDEZ**.

No misleading or fraudulent means may be used to collect and process personal data.

- **Purpose limitation:** Only personal data that are strictly necessary for the fulfillment of the purposes of processing shall be collected, in such a way that recording and disclosure of data that are not closely related to the purpose of such processing is prohibited. Therefore, every reasonable effort should be made to limit the processing of personal data to the least extent possible. In other words, the data must be: (i) adequate, (ii) relevant and (iii) in accordance with the purposes for which they were intended.

Principles for using personal data.

- **Purpose:** Data processing shall have a legitimate purpose in accordance with the Constitution and the law, which must be informed to the subject. The data subject shall be informed in a clear, sufficient and prior manner about the purpose of the information provided and therefore, no data may be collected without specifying their purpose.

Data must be processed according to the authorized uses. If, over time, the use of personal data changes in ways that the individual does not expect, prior consent of the data subject must be re-obtained.

- **Timing** Personal data shall only be kept for the reasonable and necessary time to fulfill the intended purpose and the legal requirements or instructions of the supervisory and control authorities or other competent authorities. The data will be preserved when required to fulfill a legal or contractual obligation. The rules applicable to each purpose and the administrative, accounting, fiscal, legal and historical aspects of the information will be considered in order to determine the duration of the data processing.

Once the purpose(s) have been fulfilled, the data will be erased.

- **Non-discrimination:** Any act of discrimination based on the information collected in the databases or files is prohibited.
- **Reparation:** Compensation for damages caused by possible failures in the processing of personal data is mandatory.

Principles regarding information quality

- **Accuracy:** the information should be kept accurate, complete, up to date, verifiable, and understandable. Processing of partial, incomplete, fractioned or misleading data is prohibited. Reasonable measures must be taken to ensure that the data are accurate and sufficient and, when requested by the Subject or when **WOLF MENDEZ** so determines, are updated, rectified or erased as appropriate.

Principles regarding protection, access, and dissemination of personal data

- **Security:** Each person connected to **WOLF MENDEZ** must comply with the technical, human and administrative measures set forth by the company to provide security to the personal data avoiding their adulteration, loss, consultation, use or unauthorized or fraudulent access.
- **Transparency:** during the processing, each subject should have the unrestricted right to discover whether there is any information relating to them.
- **Restricted access:** Access to personal data will be granted only to the following persons:
 - The data subject:
 - People authorized by the data subject
 - To persons who by legal mandate or court order are authorized to know the information of the data subject.
 - To other authorized persons as indicated in Article 20 of Decree 1377 of 2013.

In all cases, before granting access to the data, the identity of the person requesting the personal data must be established with certainty and sufficiency.

With the exception of public information, personal data may not be made available on the Internet or other means of dissemination or mass communication, unless access is technically controllable to provide restricted knowledge only to the subjects or authorized third parties in accordance with the law and this policy.

- **Restricted dissemination:** Personal data may only be sent or made available to the following persons:

- The data subject:
- People authorized by the data subject
- To other authorized persons as indicated in Article 20 of Decree 1377 of 2013.
- To public or administrative entities in the exercise of their legal functions or by court order.

In the latter case, in accordance with the Constitutional Court, the procedure shall be as follows:

First, the public or administrative entity must justify its request by indicating the link between the need to obtain the data and the performance of its constitutional or legal functions.

Secondly, upon delivery of the information, the public or administrative entity will be informed that it must comply with the duties and obligations imposed by Law 1581 of 2012 and its regulatory standards as Data Controller. The administrative entity receiving the personal data must comply with the obligations to protect and the guarantees derived from the aforementioned law, especially observing the principles of purpose, legitimate use, restricted dissemination, confidentiality and security.

- **Confidentiality principle:** all persons involved in the processing of non-public personal data are under the obligation to guarantee that the information is kept confidential, even after the end of their relationship with any of the tasks involved in the processing, and may only provide or communicate personal data when performing the activities authorized by law.

Purpose of the processing of clients' personal data.

WOLF MENDEZ will collect, use and process the personal data of its customers in a loyal and lawful manner to fulfill the activities of its corporate purpose and especially to provide services such as the following:

- ✓ Legal advice in all branches of legal practice, especially in Intellectual Property, Corporate Law, Unfair Competition, Consumer Law and Regulatory Affairs.
- ✓ Representation and mandate of local and international clients.
- ✓ Acquisition and/or representation of Intellectual Property rights of national and foreign clients.
- ✓ Delivery of reports on the current status of procedures entrusted to **WOLF MENDEZ**.

WOLF MENDEZ will also process personal data for the following purposes:

- ✓ To perform the relevant actions during the pre-contractual, contractual and post-contractual stages of the data subjects with **WOLF MENDEZ**, as well as any of the contracts to which they are a party, and to comply with Colombian or foreign law and orders issued by judicial or administrative authorities.
- ✓ To issue and deliver invoices, and collection of accounts receivable, including account statements.
- ✓ To deliver reports to oversight and control authorities.
- ✓ To keep the historic records of **WOLF MENDEZ**.
- ✓ To disclose, transfer and/or transmit personal data outside the country to third parties as a result of a contract, law or lawful relationship that may so require or to perform contracts to which it is a party.
- ✓ To make invitations to events, improve services or offer new ones, and all those activities related to the commercial relationship or existing or future link with **WOLF MENDEZ**.
- ✓ To manage procedures (requests, complaints, claims), conduct satisfaction surveys regarding the services offered by **WOLF MENDEZ** and **WOLF MENDEZ**'s commercial allies.

Purpose and processing of the personal data of WOLF MENDEZ employees, contractors, or vendors

The data collected or stored about the employees, contractors or suppliers of **WOLF MENDEZ** through the completion of forms, contracts, by telephone, e-mail or through the delivery of documents (resumes, annexes) will be processed

for all purposes regarding labor, legal, or contract matters, as the case may be.

Therefore, **WOLF MENDEZ** will use **employee** data for the following purposes:

- ✓ To comply with laws such as, but not limited to, labor law, social security, pensions, professional risks, family compensation funds (Integral Social Security System) and taxes;
- ✓ To comply with the directions issued by the competent judicial and administrative authorities;
- ✓ To implement labor and organizational policies and strategies.
- ✓ To promote its legal services through its own or third parties' printed or digital media.

In regards to **contractors and suppliers**, **WOLF MENDEZ** will use personal data for the following purposes:

- ✓ To carry out the relevant pre-contract, contract, and post-contract processes.
- ✓ To maintain communication with them for contract purposes.
- ✓ To comply with tax regulations.

Purpose and processing of the personal data of the visitors to WOLF MENDEZ facilities

Regarding the data obtained from video recordings made inside and outside the facilities of **WOLF MENDEZ**, they will be used for security purposes of persons, property and facilities of **WOLF MENDEZ** and may be used as evidence in any type of proceedings.

Purpose and processing of the personal data of WOLF MENDEZ partners or shareholders

Shareholders' data will be processed for the purpose of complying with the relevant legal duties such as bookkeeping and business documents. Likewise, the information will be used to carry out all activities involving the economic and political-administrative rights of the partners. Also, their data will be used to maintain communication with them.

Data subjects' rights.

People required to abide by these policies shall respect and guarantee the following rights of the data subjects:

- To be informed, update, and rectify personal data. For this purpose, it is necessary to first identify the person in order to prevent unauthorized third parties from accessing the data of the data subject.
- To receive a copy of their consent.
- To inform about the use that **WOLF MENDEZ** has given or is giving to the subject's personal data.
- To process queries and claims following the guidelines set forth by law and in this policy.
- To accept the request for withdrawal of consent and/or erasure of personal data when the Superintendence of Industry and Commerce has determined that processing by **WOLF MENDEZ** has resulted in conducts against Law 1581 of 2012 or the Constitution.

The Data Subject may also revoke the consent and request erasure of the data, when there is no legal or contractual duty that imposes its retention in the database or files of the Data Controller or Data Processor.

The request for erasure and withdrawal of consent shall not apply when the Data Subject has the legal or contractual obligation to remain in the database of the Data Controller or Data Processor.

- To have access to their personal data free of charge. The information requested by the Data Subject may be furnished by any means, including electronic means, as required by the Data Subject. The information shall be easy to read, with no

technical barriers preventing access, and shall fully match the information lodged in the database.

The following persons may exercise the data subjects' rights, pursuant to Article 20 of Decree 1377 of 2013:

- a. The Subject, who shall prove their identity through the means made available by **WOLF MENDEZ**
- b. By their successors, who must prove such capacity.
- c. By the representative and/or attorney-in-fact of the Data Subject, prior accreditation of the representation or power of attorney.
- d. By stipulation in favor of or for a third party.

The rights of children and adolescents shall be exercised by their authorized representatives.

Duties of WOLF MENDEZ in the capacity of personal data controller.

All those required to comply with this policy must be aware that **WOLF MENDEZ** is obligated to comply with the requirements set forth by Colombian law. Thus, they must act in compliance with the following obligations:

Duties of WOLF MENDEZ with the data subject.

- To request and maintain a copy of the consent granted by the subject, under the conditions set forth in this policy.
- To inform the subject in a clear and sufficient manner about the purpose of data collection and the rights they have by virtue of the granted consent.
- To ensure the subject, at all times, the full and effective exercise of the right to habeas data, i.e., to be informed, to update, or to rectify their personal data.
- To inform the subject upon request, of the use given to their personal data
- To process the queries and claims made under the terms set forth in this policy.

Duties of WOLF MENDEZ regarding quality, safety, and confidentiality of personal data

- To abide by the principles of accuracy, quality, security and confidentiality under the terms set forth in this policy.
- To keep the information under the necessary security conditions to prevent their alteration, loss, consultation, and unauthorized or fraudulent use or access.
- To update the information whenever necessary.
- To rectify personal data when appropriate.

Duties of WOLF MENDEZ when processing data through a proxy.

- To furnish the processor with only the personal data whose processing has been authorized. National and international transmissions shall be subject to a contract for the transmission of personal data or to contractual clauses containing the provisions of Article 25 of Decree 1377 of 2013.
- To ensure that the information provided to the data processor is truthful, complete, accurate, updated, verifiable and understandable.
- To communicate the data processor in a timely manner of all developments regarding the data previously furnished, and to take other necessary measures to ensure that the information provided to the data processor is kept up to date.
- To inform the data processor in a timely manner of the rectifications made to the personal data so that the data processor can make the necessary adjustments.
- To require the data processor to comply at all times with the security and privacy conditions of the information of the data subject.

- To inform the data processor when certain information is under discussion by the Data Subject, once the claim has been filed and the corresponding procedure has not been completed.

Duties of WOLF MENDEZ with the Superintendence of Industry and Commerce

- To inform them of any breaches of the security codes and of any risks in the administration of the information of the Data Subject.
- To comply with the instructions and requisites issued by the Superintendence of Industry and Commerce.

Duties of WOLF MENDEZ in the capacity of personal data processor.

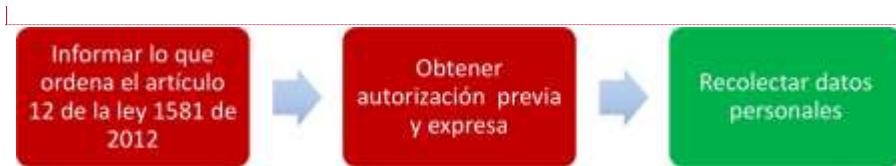
If **WOLF MENDEZ** performs data processing on behalf of another entity or organization (Data Controller), it must comply with the following duties:

- To determine whether the controller is authorized to process the data provided by **WOLF MENDEZ**.
- To ensure the subject, at all times, the full and effective exercise of the right to habeas data.
- To keep the information under the necessary security conditions to prevent their alteration, loss, consultation, and unauthorized or fraudulent use or access.
- To update, rectify or erase the data on a timely basis.
- To update the information reported by the controller within five (5) working days after receiving them.
- To process the queries and claims made by the subjects under the terms set forth in this policy.
- To register the "claim in process" caption in the database in the manner set forth in this policy.

- To insert the caption "information under judicial dispute" in the database, once notified by the competent authority about judicial proceedings involving the quality of the personal data.
- To refrain from disclosing information that is being disputed by the data subject and which has been ordered to be blocked by the Superintendence of Industry and Commerce.
- To only allow access to the information to people authorized by the subject or by law for such purpose.
- To inform the Superintendence of Industry and Commerce about violations of the security codes and risks in the administration of the subjects' data.
- To comply with the instructions and requisites issued by the Superintendence of Industry and Commerce.

On consent

Law 1581 of 2012 requires the consent to collect personal data (email address, telephone, etc.) to be informed, in advance and expressly as described below:



Comentado [U1]: Para reemplazar los textos en cada recuadro:

Informing about the provisions of Article 12 of Law 1581 of 2012

Obtaining prior and express consent

Collecting personal data

Thus, those required to comply with this policy must obtain the prior, express and informed consent of the subject to collect and process their personal data. This obligation is not necessary when dealing with data of a public nature, processing of information for historical, statistical or scientific purposes in which the information is not linked to a specific person, and data pertaining to the Civil Registry of Persons.

The following are the instructions to obtain consent:

First, prior to giving consent, the person must be clearly and expressly informed of the following:

- How their personal data will be processed and for what purpose.
- The optional nature of the answer to the questions asked, when they concern sensitive data or the data of children and adolescents.
- Their rights as data subjects as set forth in article 8 of Law 1581 of 2012.
- The identification, physical or electronic address and phone number of **WOLF MENDEZ**.

Second, obtaining consent from the subject through any means that may be consulted at a later date.

Proof of compliance with the obligation to inform and of consent must be provided. If the subject requests a copy, it must be provided.

Consent may also be obtained on the basis of unambiguous conducts of the Data Subject that lead to a reasonable conclusion that they have given their consent to process their information. Such conduct(s) must be very clear so as not to allow any doubt or misunderstanding about the will to consent to processing. Under no circumstances, can the silence of the Data Subject be considered as an unequivocal conduct.

The following persons have legitimacy to grant consent:

- a. The Subject, who shall prove their identity through the means made available by **WOLF MENDEZ**.
- b. The successors of the Subject, who must prove such capacity.
- c. The representative and/or attorney-in-fact of the Data Subject, prior accreditation of the representation or power of attorney.

Authorization may also be granted if stipulated in favor or for a third party.

Consent for sensitive data processing:

When it comes to collecting sensitive data, the following requirements must be met:

- a. Consent must be explicit.
- b. The Data Subject must be advised that they are not required to give consent to the processing of such information.
- c. The Data Subject must be informed explicitly and in advance, about which of the data to be processed are sensitive and the purpose of such processing.

Consent for processing data of children and adolescents (C&A)

When collecting and processing data of children and adolescents, the following requirements must be met:

- a. Consent must be granted by persons authorized to represent the C&A. The representative for the C&A must guarantee them the right to be heard and value their opinion about the processing, considering their maturity, autonomy and ability to understand the topic.
- b. They should be made aware that it is optional to answer questions about C&A's data.
- c. Processing should be in the best interests of C&A and ensure respect for their fundamental rights. The Data Subject must be informed explicitly and in advance as to which of the data to be processed are sensitive and the purpose of said processing.

Classification and special processing of certain personal data

Those required to comply with this policy must identify sensitive and children and adolescent (C&A) data that they may eventually collect or store, in order to:

- Implement enhanced accountability in the processing of this data, which translates into a more stringent obligation in terms of compliance with the principles and duties.
- Increase security levels for such information.
- Increase access and use restrictions to the staff of **WOLF MENDEZ** and third parties.

- Observe the legal requirements and the provisions of this policy for their collection

International transfer of personal data

Sending or transferring data to another country will require consent from the Subject of the information that is being transferred. Unless provided otherwise by law, such consent is a prerequisite for the international dissemination of data. Thus, before sending personal data to Data Controllers abroad, those required to comply with this policy must verify that they have the prior, express and unequivocal consent of the Data Subject allowing them to transfer their personal data.

International and domestic transfer of data to Processors

Whenever **WOLF MENDEZ** wishes to send or transmit data to one or more processors located within or outside the territory of the Republic of Colombia, it shall establish the following, among others, either by contractual clauses or a contract for transmitting personal data:

- (i) the scope of the processing;
- (ii) the activities the processor will undertake on behalf of **WOLF MENDEZ**;
- (iii) the obligations the Processor shall fulfill regarding the Subject and **WOLF MENDEZ**;
- (iv) the obligation the Processor has to comply with the obligations of the Controller by observing this policy;
- (v) the duty the Processor has to process data with the agreed purpose while observing the principles provided in Colombian laws and this policy;
- (vi) the obligation of the Data Processor to adequately protect the personal data and databases as well as to maintain confidentiality with respect to the processing of the transmitted data.

Procedures for subjects to exercise their rights

The following are the procedures for data subjects to exercise their rights to be informed, update, rectify and erase information or revoke their consent.

The following persons may exercise the data subjects' rights, pursuant to Article 20 of Decree 1377 of 2013:

- a. The Subject, who shall prove their identity through the means made available by **WOLF MENDEZ**.
- b. By their successors, who must prove such capacity.
- c. By the representative and/or attorney-in-fact of the Data Subject, prior accreditation of the representation or power of attorney.
- d. By stipulation in favor of or for a third party.

The rights of children and adolescents shall be exercised by their authorized representatives.

All queries and claims will be channeled through the means made available by **WOLF MENDEZ**, via (internet, fax, etc.) and by calling 6235828 in Bogota, who will implement mechanisms to prove the filing and processing of such queries and claims.

These are the guidelines for responding to queries and claims:

Queries

All queries made by the persons legitimately entitled to learn about the personal data held by **WOLF MENDEZ** will be handled through the channels that **WOLF MENDEZ** has provided for this purpose. In any case the following proof is required:

- Date of the query
- Identity of the inquirer

Once the identity of the Subject has been verified, the requested personal data will be provided. Response to the query must be communicated to the inquirer within ten (10) business days from the date of receipt of the inquiry.

When the query cannot be handled within such term, the interested party shall be duly informed, stating the reasons for the delay and indicating the date on which the query will be handled, which in no case may exceed five (5) working days following the expiration of the first term.

Claims

Claims are intended to correct, update, or erase data or to file a complaint for the alleged breach of any of the duties described in Law 1581 of 2012 and in this policy.

The claim must be submitted in a request addressed to **WOLF MENDEZ** and containing the following information:

- a. Name and identification of the data subject or of the legitimated person.
- b. A full and accurate account of the facts giving rise to the claim.
- c. The physical or electronic address to deliver the response and to inform about procedure status.
- d. Documents and other relevant evidence that you want to be considered.

If the claim is incomplete, the interested party will be summoned within five (5) business days following the receipt of the claim to remedy the faults. After two (2) months from the date of the summons, without the applicant submitting the required information, the claim will be deemed withdrawn.

If the claim is complete, the database or information system will include a caption that reads "claim in process" and the reason for the claim, in a term no longer than two (2) business days. Such caption shall remain until the claim has been solved.

The maximum term to address the claim will be fifteen (15) business days from the day following the date of receipt. When the query cannot be handled within such term, the interested party shall be duly informed, stating the reasons for the delay and indicating the date on which the query will be handled, which in no case may exceed eight (8) working days following the expiration of the first term.

Person or area responsible for protecting personal data

The Financial and Administrative Department of **WOLF MENDEZ** is the area in charge of data protection; they can be reached via their *institutional e-mail* at dircontable@wolfmendez.com and by phone at 6235828 in Bogota.

Video surveillance

- **WOLF MENDEZ** uses several video surveillance methods that have been set up in internal an external parts of our facilities or offices.
- **WOLF MENDEZ** uses visible signaling to warn about the existence of these video surveillance mechanisms.
- The information gathered will be used for the safety of people, goods, and facilities. It may be used as evidence in any type of proceedings before any type of authority and organization.

Other documents comprising this policy

(In case there are any other policies, such as an Information security policy)

In the event of any inconsistency with the aforementioned documents regarding processing of personal data, the terms in this policy shall prevail.

Proven responsibility regarding personal data processing.

WOLF MENDEZ will adopt the necessary measures to, if required, prove to the Superintendence of Industry and Commerce (SIC) that it has implemented appropriate and effective measures to comply with its legal obligations in all matters related to processing personal data. Such measures shall be consistent with the instruction issued by SIC for said purposes, and with the provisions of Articles 26 and 27 of Decree 1377 of 2013.

Effective date of this policy and validity of the database.

This policy was approved after the enactment of Law 1581 of, 2012 and amended to include some aspects provided for in Decrees 1377 of 2013, 886 of 2014 and 1074 of 2015, and therefore will come into force as of November 8, 2016.

The database will remain valid during the reasonable and necessary time to fulfill the purposes of the data processing, taking into account the provisions of Article 11 of Decree 1377 of 2013.

Controller information:

Name or company name: WOLF MÉNDEZ ABOGADOS ASOCIADOS LTDA.

T.I.N.:830029907-2

Address: Calle 83A No. 23-90

E-mail: dircontable@wolfmendez.com

Phone:6235828

Website: www.wolfmendez.com