

PERSONAL DATA TREATMENT POLICIES

DISCLAIMER: ONGRESSO COLOMBIA S.A.S is a Colombian based Company currently domiciled in the city of Medellín, Antioquia that provides several management services. As such, this Company abides by Colombian legislation and ratified international treaties applicable to the company operations and corporate statutes, therefore, any discrepancies about applicable legislation as well as civil, administrative or criminal liability of any sort and/or any other legal or contractual consequences derived from personal data treatment operations carried out by the company must be addressed under the laws of the Republic of Colombia and must always consult the spirit of the law.

ONGRESSO COLOMBIA S.A.S., is a Colombian Commerce Law regulated company, identified with Colombian tax identification number Nit. 900.526.305 –4, legally incorporated and domiciled in the city of Medellín, Antioquia, that is responsible for the processing and treatment of the personal data that you own.

Given that we are fully aware of the importance of an appropriate personal information and data management, **ONGRESSO COLOMBIA S.A.S.** has established a number of procedures, security standards and technological tools that allow us to store, transfer, administrate, analyse and use personal information through safe protocols, legal access restrictions, safe software development practices, among others.

In accordance with the above, and in compliance with the Statutory Habeas Data Law, the Statutory Personal Data Protection Law (Ley 1581 de 2012) and its regulatory decree (Decreto Reglamentario 1377 de 2013), **ONGRESSO COLOMBIA S.A.S.** issues the following Personal Data Treatment Policies:

- 1. SCOPE OF APPLICATION:** These policies regulate the treatment of public, semiprivate, private and/or sensitive personal data and information **ONGRESSO COLOMBIA S.A.S.** obtains, stores and uses.
- 2. AIM:** To regulate the mechanisms of collection, storing and use of public, semiprivate, private or sensitive data of users, clients, providers, customers, employees, affiliates and associates of **ONGRESSO COLOMBIA S.A.S.**, ensuring their proper treatment and privacy.
- 3. USER:** Individual person who, because or derived from a commercial/contractual/consulting/employment/affiliation/association and/or other

relation, acting as a visitor, client, provider, contractor, employee or former employee, among others, willingly provides or submits personal data or information to **ONGRESSO COLOMBIA S.A.S.** through any of the channels supplied by the company such as the official web site, e-mails, digital data messages, physical or electronic correspondence, both land or mobile phone lines, direct providing or submission to the administrative office, etc.

By providing or submitting personal data or information to **ONGRESSO COLOMBIA S.A.S.**, the user/owner agrees to the terms and conditions of the Personal Data Treatment Policies contained in this document.

4. **OWNER/HOLDER AUTHORIZATION:** Notwithstanding the exceptions foreseen in the law, the personal data or information treatment requires previous and informed authorization by the owner of the Personal Data or Information. Such authorization must be obtained by any means or format that allows subsequent consultation.
5. **DATA AND INFORMATION TREATMENT: ONGRESSO COLOMBIA S.A.S.** might use the personal data or information collected to fulfil/complete/process and/or carry out any of the following purposes:
 - a. Complete contractual processes with **ONGRESSO COLOMBIA S.A.S.**, included but not limited to contract execution, payment operations, reception/procuring/delivery of goods and services, based and on the occasion of its corporate purpose.
 - b. The procurement of services related to the products of **ONGRESSO COLOMBIA S.A.S.** and all or some of their affiliates and subsidiaries considering that the main activity and corporate purpose of the company is to provide management consulting services.
 - c. Advance and pursue the establishment of the necessary judicial and non-judicial procedures to obtain the compliance of the obligations undertaken by users, included but not limited to performing requirements, demands, communications, lawsuits, notifications, legal notices, etc.
 - d. Provide proper customer/client/contractor service regarding the relation the user has with **ONGRESSO COLOMBIA S.A.S.**
 - e. Sending the marketing communications that **ONGRESSO COLOMBIA S.A.S.** considers to be relevant for you.
 - f. Sending information regarding events, activities, promotions, offers and/or any commercial activities carried out by **ONGRESSO COLOMBIA S.A.S.** regarding its corporate purpose.

- g. Establish a personalized relation that allows to provide custom offers and products.
- h. Meet the requirements of our users regarding the relation they have or come to have with **ONGRESSO COLOMBIA S.A.S.**
- i. Allow **ONGRESSO COLOMBIA S.A.S.** to meet its business activities such as data analysis, market research, service and web site improvement, events holding, marketing campaign effectivity, etc.
- j. Issuance of certificates regarding the relation of the user with **ONGRESSO COLOMBIA S.A.S.**
- k. Delivery of personal data to third parties to whom **ONGRESSO COLOMBIA S.A.S.** handles partially or completely the Personal Data and Information Treatment operations.
- l. Sending information related to the company.
- m. Preserving historical records of the company and maintain contact with the owners of the personal data or information.
- n. Deliver collected data and information to third parties with which the company hires/engage to storage and manage personal data and information, under the standards of security and confidentiality under which the company will be obliged.

Paragraph: ONGRESSO COLOMBIA S.A.S. under no circumstance will directly market the personal data or information collected from users.

6. PERSONAL DATA OWNER RIGHTS: In compliance with the Statutory Personal Data Protection Law (Ley 1581 de 2012) Article 8, the owner of the personal data or information has the following rights:

- a. To know, update and rectify their personal data before **ONGRESSO COLOMBIA S.A.S.** or the Treatment Manager or Managers. This right may be exercised, inter alia, against partial, inaccurate, incomplete, split, misleading data or those whose treatment is expressly prohibited or not authorized;
- b. To demand evidence of the authorization granted to **ONGRESSO COLOMBIA S.A.S.** except when its expressly excluded as a requisite for the treatment of personal data or information, in compliance with the Statutory Personal Data Protection Law (Ley 1581 de 2012) Article 10.
- c. To be informed by **ONGRESSO COLOMBIA S.A.S.** or the Treatment Manager or Managers about the use that has been given to their personal data or information;
- d. To file before the Commerce and Industry Superintendence (Superintendencia de Industria y Comercio – SIC) complaints about breaches to the Statutory Personal Data Protection Law (Ley 1581 de 2012) and the other norms that modify, add, or complete the abovementioned;

- e. To revoke the authorization and/or request the suppression of the personal data when in its treatment, legal and constitutional principles, rights and guarantees are not upheld. The revocation or deletion will proceed when the Commerce and Industry Superintendence (Superintendencia de Industria y Comercio – SIC) rules that the personal data treatment given by **ONGRESSO COLOMBIA S.A.S.** or the Treatment Manager was against the Statutory Personal Data Protection Law (Ley 1581 de 2012) and/or the Colombian Constitution;
- f. To access freely to the owned personal data that has undergone treatment by the company or the Treatment Manager or Managers.

7. DUTIES OF ONGRESSO COLOMBIA S.A.S.: As the responsible for the personal data Treatment, in compliance with the Statutory Personal Data Protection Law (Ley 1581 de 2012) Article 17 and without detriment to any other legal provision, the company duties regarding Personal Data Treatment are as follows:

- a. To guarantee the owner, at all times, the full and effective exercise of their Habeas Data Right;
- b. To request and keep in their corporate archives, under the conditions established by the Statutory Personal Data Protection Law (Ley 1581 de 2012), a copy of the authorization granted by the Personal Data owner;
- c. To diligently inform the Personal Data owner about the treatment purposes and the rights granted by the treatment authorization;
- d. To retain all information under the necessary safety conditions necessary to avoid alteration, loss, later reference, unauthorized or fraudulent access;
- e. To guarantee that the information supplied by the Treatment Manager is truthful, complete, exact, updated, verifiable and comprehensible;
- f. To update the information, communicating in a timely manner to the Treatment Manager, all events regarding previously collected or treated Personal Data, and to take all necessary measures to ensure that the Data provided to the Treatment Manager is constantly updated;
- g. To rectify the information when it ought to be incorrect, and to communicate such circumstance to the Treatment Manager;
- h. To supply the Treatment Manager only with the Personal Data whose treatment is previously authorized in compliance with the Statutory Personal Data Protection Law (Ley 1581 de 2012);
- i. To demand from the Treatment Manager, at any given time, to fully respect and uphold the security and privacy terms & conditions of the Personal Data Treatment Policies;

- j. To process the inquires and claims raised in compliance with the Statutory Personal Data Protection Law (Ley 1581 de 2012);
- k. To implement an internal procedures and policies manual to guarantee the proper compliance with the Statutory Personal Data Protection Law (Ley 1581 de 2012), and particularly to process the inquires and claims that can be presented;
- l. To inform the Treatment Manager when any collected or treated information is under discussion by the owner, once the claim or inquiry is currently being processed;
- m. To inform the Personal Data Owner about the use given to their data;
- n. To inform the Data Protection Authority, being such the Commerce and Industry Superintendence (Superintendencia de Industria y Comercio – SIC), or any other, about any security code breach that translates into a substantial risk for the Personal Data owner’s information;
- o. To comply with the instructions and requirements given by the Commerce and Industry Superintendence (Superintendencia de Industria y Comercio – SIC).

8. PROCEDURE TO CONSULT, UPDATE, RECTIFY AND SUPRESS INFORMATION AND/OR

REVOKE THE TREATMENT AUTHORIZATION: The Personal Data owner or the person with legitimate interest must follow the following procedure to consult, update, rectify, supress information and to revoke the personal data treatment authorization:

- a. File a written request to **ONGRESSO COLOMBIA S.A.S.** where you specify the concrete petition.
- b. Such request can be presented physically in the main **ONGRESSO COLOMBIA S.A.S.** office located in Carrera 41 # 9 – 60 Oficina 202, of the city of Medellín – Antioquia, Colombia or digitally through the following email: habeasdataclaims@ongresso.com
- c. The Personal Data owner or the person with legitimate interest must prove their legitimacy or condition with a copy of their personal identification document. (i.e Passport, Citizenship Card, Birth Certificate, etc.).
- d. The request can be presented through an authorized third party individual, in which case the request must have a copy of their Citizenship Card and a power of attorney that must explicitly contain the faculties given to the third party individual to file the request. This power of attorney must be recognized before a public Notary of the Republic of Colombia or be properly apostilled according to The Hague Convention.
- e. The request must contain the following information:
 - Name of the Personal Data owner or the person with legitimate interest and his representative, when acting through a representative/third party individual.

- Concrete and exact request to consult, update, rectify, suppress information and/or revoke the treatment authorization.
 - Factual and legal basis of the request.
 - Physical or digital address for notification.
 - Sign of the request by the Personal Data owner or the person with legitimate interest and his representative, when acting through a representative/third party individual.
- f. When the request is sent to **ONGRESSO COLOMBIA S.A.S.** through email, all documents required to process the inquiry/claim must be digitalized and attached to the message.
 - g. In the event the request lacks any or some requisites, **ONGRESSO COLOMBIA S.A.S.** will notify this situation to the Personal Data owner or the person with legitimate interest, according each case, within five (5) business days after receiving the request, for them to proceed to correct or complete the request. After thirty (30) business days without correcting or completing the request, **ONGRESSO COLOMBIA S.A.S.** will consider for all legal purposes that the request or claim has been withdrawn.
 - h. **ONGRESSO COLOMBIA S.A.S.** will have fifteen (15) business days after receiving the initial or corrected request (in which case the time period will count from the day it was corrected, not initially received) to answer the request or claim. When **ONGRESSO COLOMBIA S.A.S.** finds themselves incapable of providing a full answer within this period of time, such circumstance will be informed to the Owner, Person with legitimate interest or the third party representative, according to the case, with the details of the reasons of the delay and the date of the expected answer, which cannot surpass by more than eight (8) business days the original answering period.
 - i. **ONGRESSO COLOMBIA S.A.S.** will document and store the requests or claims made by the owners, people with legitimate interest or third party representatives, according to the case, as well as the answers given to each request or claim.
 - j. Prior to the filing of any claim or reporting any breach to the Statutory Personal Data Protection Law (Ley 1581 de 2012) before the Commerce and Industry Superintendence (Superintendencia de Industria y Comercio – SIC), all Personal Data owners, or people with legitimate interest and/or third party representative must exhaust the abovementioned procedure.
9. **DATA TREATMENT RESPONSIBLE:** The Office Administration area of **ONGRESSO COLOMBIA S.A.S.** is responsible for receiving petitions, consultations and claims presented by the Owner of the persona data or information when exercising their rights to consult, update, rectify, suppress information and to revoke the personal data

treatment authorization, whose Treatment Manager must understand and comply with the policies contained in this document.

10. DATA TREATMENT MANAGER: According with the abovementioned, and in compliance with the Statutory Personal Data Protection Law (Ley 1581 de 2012), its regulatory decree (Decreto Reglamentario 1377 de 2013) and the Policies contained in this document, **ONGRESSO COLOMBIA S.A.S.** hereby informs to all Personal Data Owners and users, that the person listed as Treatment Manager for the Personal Data or Information collected and/or used (in general, treated) by **ONGRESSO COLOMBIA S.A.S.** is the following:

- **Name:** Daniel Beat Breitenmoser
- **Identification type and number:** Cédula de Extranjería 389.175
- **Address:** Carrera 41 # 9 – 60 Oficina 202
- **Departament:** Antioquia
- **City:** Medellín
- **Email:** dbreitenmoser@ongresso.com
- **Mobile phone:** (+57) 318 293 3764
- **Land line:** (+57 4) 320 4316
- **Website:** <http://www.ongresso.com/>

11. MASSIVE EMAILS (NEWSLETTERS) RESPONSABILITY: Notwithstanding all kinds of legal actions permitted by the law, **ONGRESSO COLOMBIA S.A.S.** is responsible for the personal data treatment of information collected or received from both our website or any of our corporate emails, according to all applicable Personal Data treatment regulations. Limited by the authorized channels of data collection referred in this Personal Data Treatment Policy, **ONGRESSO COLOMBIA S.A.S.** is committed to answer for any liability generated regarding the company personal data safety and treatment operations.

If you, as an user or personal data owner, have granted your consent or authorization to subscribe to our newsletters, you must expect to receive such communications regularly, according to the service and/or product offered and our periodic marketing campaigns. We might also contact or reach out to you for a post-sale poll or brief questionnaire regarding the products and/or services provided by the Company. If the sale process or operation is interrupted, we might send you an email as a reminder. You can immediately and freely unsubscribe from this kind of notification by following the link attached to the email for that purpose or by accessing our main website and following the procedure there indicated.

12. PERIOD OF VALIDITY OF THE CORPORATE DATABASES: Notwithstanding the exceptions and obligations foreseen in the law, **ONGRESSO COLOMBIA S.A.S.** will store the Personal Data for as long as necessary to fulfil the purposes described in this document.

13. CHANGES TO THE DATA TREATMENT POLICIES: In compliance with the Personal Data Protection regulatory decree (Decreto Reglamentario 1377 de 2013), Article 5°, whenever there is a significant change to the Data Treatment Policies regarding the corporate identification of **ONGRESSO COLOMBIA S.A.S.** and/or the purpose of the Personal Data Treatment and/or similar circumstances that could affect the scope of the treatment authorization, **ONGRESSO COLOMBIA S.A.S.** must inform said change to the Personal Data or information owner before or concurrently to the change or implementation of the new policies. Moreover, the Company must obtain a new authorization from the Personal Data or information owner when the change made to the Personal Data Treatment Policies refers to the purpose of the treatment.

14. PERIOD OF VALIDITY OF THE PERSONAL DATA TREATMENT POLICIES: The policies contained in this document begin to take effect from October 15, 2016.

To exercise your rights and to get further information, regarding our Personal Data Treatment Policies and/or Terms & Conditions, please contact us:

1. Email : habeasdataclaims@ongresso.com
2. Website : <http://www.ongresso.com/>
3. Land line : (+574) 320 4316
4. Address : Carrera 41 # 9 – 60 Oficina 202, Medellín, Colombia.