

TREATMENT INFORMATION POLICY AND PERSONAL DATA

Acting in compliance with the requirements that were established for the treatment of data and personal information belonging to third parties, as natural persons, by provision of Law 1581 of 2012 "by which general provisions are issued for protection of personal data "and its implementing regulations 1377, 2013 and 886 of 2014, now fully repealed by chapters 25 and 26 of the Single regulatory Decree of Industry, Trade and Tourism 1074 dated 26 May 2015 industry and in the other regulations that supplement, amend or regulate, ENTERPRISE MANAGEMENT SERVICES SAS, commercial company legally incorporated under national law, with its headquarters in the city of Barranquilla - Atlantico, and identified with the NIT 900233015-5 in the commercial register, working in strict compliance with legal requirements and committed to the proper treatment of the information you have provided to us in connection with our business relationship and / or labor or merely informative activities , we allow us to introduce our Policy and Information Processing Personal data (PTIDP).

We recommend a judicious reading of this document, especially when it becomes aware that the purpose of the PTIDP is to inform and define the rules for processing personal information and within the Company as well as guidelines for you to exercise timely and effective, as the holder of such information, so their rights to privacy, good name and information, in accordance with the provisions of articles 15 and 20 of the Constitution of the Republic of Colombia, especially in concerning the power of all people "know, update and rectify information gathered about them in databases or files"

TREATMENT INFORMATION POLICY AND PERSONAL DATA

SAS ENTERPRISE MANAGEMENT SERVICES

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1. OBJECT: This document, contentive policy treatment of personal information and data (PTIDP) ENTERPRISE MANAGEMENT SERVICES SAS intends to comply with the provisions of Title VI of Law 1581 of 2012, specifically the provisions of Articles 17 and 18 as well as I ruled in Section 3 of Chapter 25 of the Single Regulatory Decree

1074 of 2015, whereby the aforementioned law regulations. So, they are described below procedures established by our company to make a proper treatment of information and data pertaining to third parties.

2. GOVERNING LAW AND INTERPRETATION: The PTIDP ENTERPRISE MANAGEMENT SERVICES SAS is

3. SCOPE: The PTIDP ENTERPRISE MANAGEMENT SERVICES SAS shall apply to that company, their dependents, whether subsidiaries or subordinate, that under exploitation and legal and responsible development of the corporate purpose of the company, there Were collected or obtained information or personal data owned by customers, employees, workers or third parties in general.

TITLE II - DEFINITIONS AND GUIDING PRINCIPLES

4. DEFINITIONS PTIDP: ENTERPRISE MANAGEMENT SERVICES SAS informs holders of information and personal data, the following definitions and concepts, whose repetitive use under the PTIDP imposes a duty on the signing of illustrating, in a clear, complete and timely manner, about the scope of those notions as regulated under articles 3, 5 and 26 of Law 1581 of 2012 and Article 2.2.2.25.1.3 Single Regulatory Decree 1074 of 2015, namely:

- **Authorization:** It is understood authorization prior, express and informed that the owner of the information and personal data can give ENTERPRISE MANAGEMENT SERVICES SAS so that the latter can perform activities involving processing of such data and information.
- **Database:** Understood by database organized set of personal information that is processed by ENTERPRISE MANAGEMENT SERVICES SAS
- **Personal data:** It is any information that may be associated or linked to one or more specific or identifiable individuals.
- **sensitive data:** It is understood by sensitive data to those affecting the privacy of the owner or whose misuse can generate their discrimination, such as those revealing racial or ethnic origin, political orientation, religious or philosophical beliefs, trade union membership, social organizations , human rights or promote interests of any political party or to guarantee the rights and guarantees of opposition political parties, as well as data concerning health, sexual and reproductive lives and biometric data.
- **Public information:** Understood by public information to anyone who is not semiprivate, private or sensitive. In general, they are considered public data, among others, those relating to the civil status of persons, to their profession or trade and as a merchant or public servant. By its nature, public data can be contained among others, public records, public records, official gazettes and newsletters, as well as duly executory judgments which are not subject to reservation by express legal provision.
- **Processor:** natural or juridical, public or private, which by itself or in association with others, perform the processing of personal data on behalf of the controller.
- **Controller:** natural or juridical, public or private, which by itself or in association with others, decide on the database and / or data processing. For the

purposes of this PTIDP, ENTERPRISE MANAGEMENT SERVICES SAS acts as charge and controller simultaneously.

- **Headline:** natural person whose personal data are processed.
- **Treatment:** Any operation or set of operations on personal, such as collection, storage, use, movement or deletion data.
- **Notice of Privacy:** verbal or written communication generated by the controller, to the holder of the information and personal data, by which is informed about the existence of PTIDP ENTERPRISE MANAGEMENT SERVICES SAS that apply, how to access same and objectives of treatment intended to give their personal data.
- **Transfer:** Data transfer takes place when the responsible and / or processor of personal data, located in Colombia, sends information or personal data to a receiver, who in turn is responsible for treatment, and is located inside or outside from the country.
- **Transmission:** The transmission is a method of processing information and personal data that involves communicating them within or outside the territory of the Republic of Colombia, when intended to carry out treatment activities by the manager, but always on behalf of responsible.
- **National Register of Databases:** It is the public directory of personal databases subject to processing activities operating in the country, whose administration is in charge of the Superintendence of Industry and Commerce as the highest administrative authority monitoring and control on the processing of personal data and habeas data.

5. GUIDING PRINCIPLES OF THE PROCESSING OF PERSONAL DATA: ENTERPRISE MANAGEMENT SERVICES SAS, in his dual capacity as manager and responsible for the processing of personal data, declares that this PTIDP is adjusted to the provisions of legal order contained in Law 1581 of 2012 and the Single Regulatory Decree 1074 of 2015, so in the development of processing activities in the implementation of the PTIDP, and the interpretation of it is come on the basis of the aforementioned rules shall apply in harmony with the principles of legality, purpose, freedom, truthfulness or quality, transparency, access and restricted movement, security and confidentiality in the manner prescribed in Article 4 of Law 1581 of 2012.

TITLE III - RIGHTS AND DUTIES OF OWNERS AND MANAGERS RESPONSIBLE TREATMENT

6. RIGHTS OF HOLDERS OF PERSONAL DATA: in accordance with the provisions of Title IV of Law 1581 of 2012, ENTERPRISE MANAGEMENT SERVICES SAS ensure holders the information and personal data processed, the exercise of these rights at any time and without complying with higher requirements:

- Know, update and rectify your personal data against SAS ENTERPRISE MANAGEMENT SERVICES its responsibility and responsible treatment. This right may be exercised, among others, against partial, inaccurate, incomplete, split data, misleading or against those whose treatment is expressly prohibited by law or not authorized by the owner.
- Request proof of the authorization granted to ENTERPRISE MANAGEMENT SERVICES SAS in its capacity as responsible and in charge of the treatment, unless expressly excepted

as a requirement for treatment in accordance with the provisions of Article 10 of Law 1581 of 2012.

- Be informed by ENTERPRISE MANAGEMENT SERVICES SAS, as responsible and in charge of treatment, upon request, regarding the use that has been given to personal data.
- Submit to the Superintendency of Industry and Commerce complaints for violations of the provisions of this Act and other regulations that modify, add or supplement.
- Revoke the authorization and / or request removal of personal data when treating those ENTERPRISE MANAGEMENT SERVICES SAS does not respect the principles, rights and constitutional and legal guarantees. *

* In any case, such a reversal and / or deletion proceed only when the Superintendency of Industry and Commerce has determined that in the development of processing activities, the company has engaged in conduct contrary to Law 1581 of 2012 and the Constitution of the Republic of Colombia.

7. LEGITIMATE FOR THE EXERCISE OF THE RIGHTS OF HOLDERS: To Article 2.2.2.25.4.1 Single Regulatory Decree 1074 of 2015, the rights of the holders of the data and information of a personal nature may be exercised by the individuals listed below:

- a. By the respective holder, who must prove his identity sufficiently by the various means available to responsible.
- b. For their successors, who must prove that quality.
- c. The representative and / or agent of the owner, with proof of representation or empowerment.
- d. By stipulation for another or for another. Since the case where the holder of the information is a minor, his rights may be exercised only by persons who under the law are empowered to represent them.

8. DUTIES OF LIABLE and processors: ENTERPRISE MANAGEMENT SERVICES SAS, in its dual capacity charge and responsible for the processing of personal data, recognizes that is obliged to fulfill the duties set out in Title VI of Law 1581 of 2012.

TITLE IV - AUTHORIZATION FOR THE TREATMENT OF PERSONAL DATA

9. measures implemented TO ENSURE ACCESS TO PTIDP: To the extent that ENTERPRISE MANAGEMENT SERVICES SAS has collected data and information of a personal nature in prior to the entry into force of Decree

1377 of 2013 times, that is, before 27 June of that year, the company, with the aim of fully comply with the provisions of paragraph 1 of Article 2.2.2.25.2.7 Single Regulatory Decree 1074 of 2015, made use of efficient communication mechanisms referred to in paragraph 2 of the same provision in order to request a new authorization holder of the above information and personal data, and in order to inform you of this PTIDP through the respective privacy notice.

SAS ENTERPRISE MANAGEMENT SERVICES notes, in the particular case, the communication channel is usually used to interact with the owners of the data and personal information registered in its database communication is via email.

10. AUTHORIZATION HOLDER: Any activity of collection, conservation, use, management, updating, correction, deletion and, in general, any activity through which is sought and / or processing data and personal information belonging to third parties, must be carried out by authorized prior express free of their respective owners.

In any case, the granting of the authorization by the holder for the collection and processing of information and personal data, it is understood that he has read this PTIDP, since it has been informed verbally and in writing, to through the respective privacy notice that PTIDP is available in offices ENTERPRISE MANAGEMENT SERVICES SAS also by means of the authorization for the collection and processing of information and personal data, the owner states that the data and information are truthful, complete, accurate, current, verifiable, understandable and correspond to reality force when they are supplied.

11. TEST FACILITY AUTHORIZATION HOLDER: Shall be the duty of ENTERPRISE MANAGEMENT SERVICES SAS make available to the holders of information and personal data processed authorization document, in order that there is a free, express prior consent, in the best case, writing, sufficiently informed.

The authorization granted by the holder of the information may be in writing, either in a physical, digital or magnetic media document and audio files, technology platforms data storage online or at any other suitable means and suitable to prove the owner's consent and authorization for the processing of personal data.

For those cases where a written contract of any kind between the owner of the information and personal data and ENTERPRISE MANAGEMENT SERVICES SAS is signed, it will be feasible to record therein or their respective otheries, as appropriate, prior authorization for processing of personal data.

12. CASES WHERE NO AUTHORIZATION IS NECESSARY: pursuant to Article 10 of Law 1581 of 2012, the authorization holder shall not be required if the information or data processed are those described below:

- to. Information required by a public or administrative entity in the exercise of their legal or court order functions.
- b. Data of a public nature.
- c. Cases of medical or health emergency.
- d. Information processing authorized by law for historical, statistical or scientific purposes.
- and. Data related to the civil registration of persons.

13. REVOCATION OF APPROVAL AND APPLICATION FOR ABOLITION OF FACT: Under the terms of Article 9 of Law 1581 of 2012, holders of personal information and data may at any time request ENTERPRISE MANAGEMENT SERVICES SAS in its dual capacity as manager and responsible for the deletion of your personal data and / or revoke the authorization granted for the treatment thereof, upon presentation of a claim.

In accordance with Article 2.2.2.25.2.8 Single Regulatory Decree 1074 of 2015, the request for deletion of information and revocation of authorization shall not proceed when the holder of that have a legal or contractual duty to remain at the base of data.

In the hypothetical case that has expired term established to respond to the request for revocation of authorization or deletion of personal data without ENTERPRISE MANAGEMENT SERVICES SAS any revoked the authorization or deleted data nor responded about the inappropriateness of that, the holder shall be entitled to attend the Superintendency of Industry and Commerce for that entity, exercising their judicial powers, ordered the revocation of the authorization and / or deletion of personal data, prior exhaustion of sanctioning procedure laid down in

Article 22 of Law 1581

2012.

TITLE V - TREATMENT AND PURPOSE OF PROCESSING

14. Personal data processed: Information and / or personal data will be processed by ENTERPRISE MANAGEMENT SERVICES SAS are solely the following:

- Names and surnames.
- Identity card number and place of issue.
- Domicile or place of residence.
- Country of residence.
- Address.
- Email address.
- Information of an economic, financial or credit basis for judicial purposes.

In parallel, ENTERPRISE MANAGEMENT SERVICES SAS declares that in the ordinary course of business, especially in the development of work management and portfolio recovery, as data processor may receive personal data of people who have been constituted debtor companies in the financial sector. In such events, ENTERPRISE MANAGEMENT SERVICES SAS is obliged to comply, in addition to the duties under Title VI of Law 1581 of 2012, the duties and obligations under Article 8.2.3 of Chapter 6 of Title I of the External Circular No.

048 of 2008 of the financial Supervisory Authority on the "rules on competition and financial consumer protection."

In any case, treatment activities that are ahead with the information and data provided by companies in the financial sector within the framework of the recovery work portfolio, will be made, in any case, on behalf of that, so which will be the company for the financial sector, in its capacity as data controller, who will have to comply with and abide by the guidelines attributable to it under Law 1266, 2008 and 1328

2009.

15. GENERAL PROHIBITION OF SENSITIVE DATA PROCESSING: In accordance with the ruled in paragraph 1 of Article 6 of Law 1581 of 2012, the processing of sensitive personal data is prohibited by rule. However, in accordance with paragraph d) of that provision, the processing of such data shall not be prohibited, provided that there is proper authorization of the owner, when treatment activities and purposes the same Verse on data necessary for the establishment, exercise or defense of a right in judicial proceedings.

According to the above, and taking into consideration that ENTERPRISE MANAGEMENT SERVICES SAS is a company that among the constituent work of its corporate purpose involves the provision of services, processing of sensitive data concerning health, and in some events relating to sexual orientation, will not be required.

For these purposes, and in accordance with the provisions of Article 2.2.2.25.2.3 Single Regulatory Decree 1074 of 2015, SAS ENTERPRISE MANAGEMENT SERVICES express written authorization request to the holder of sensitive data to consent to treatment, after informing explicitly the following:

- to. It is not obliged to authorize the processing of sensitive data whenever it is not his Will.
- b. To respond to any question or questioning ENTERPRISE MANAGEMENT SERVICES SAS made through its employees and / or dependents in relation to their sensitive personal data is optional.
- c. What will your sensitive data will be processed by the firm and for what purpose.
- d. All information relating to sensitive data to provide and collaborators dependents shall be protected under professional secrecy that should keep it under law, and that adequate and appropriate measures for their protection should be used.

16. PROCESSING OF PERSONAL DATA OF MINORS: ENTERPRISE MANAGEMENT SERVICES SAS knows and respects the prohibition in Article 7 of Law 1581 of 2012 concerning the processing of data of children and adolescents except in cases where they are of those data could be considered as nature public.

In the event that the company intends to conduct business processing personal data public ownership of minors, ENTERPRISE MANAGEMENT SERVICES SAS advocate and respect the interests of the children, ensuring full respect for their fundamental rights.

Likewise, ENTERPRISE MANAGEMENT SERVICES SAS shall not submit data private and semiprivate owned by minors to treatment activities without there being proper authorization of the legal representative in terms of law and in accordance with the present PTIDP.

17. TREATMENT TO WHICH performed on data: ENTERPRISE MANAGEMENT SERVICES SAS guarantees that the information contained in the database will be used correctly and

for lawful purposes, in accordance with current regulations without detriment to the right to habeas data protected by the Constitution of the Republic of Colombia.

The processing of personal data described above from the company be limited only to collection activities storage and use of such information for the purposes described in the following article.

FIRST PARAGRAPH: ENTERPRISE MANAGEMENT SERVICES SAS guarantees all depositors of information and personal data that it will not be used for purposes other than those respectively authorized by their owners or be sold, or sold to third parties under any figure, nationally or internationally, without mediate prior authorization.

18. PURPOSE OF PROCESSING: ENTERPRISE MANAGEMENT SERVICES SAS guarantees that the information and personal data you collect and undergo treatment will be used solely in order to develop fully the corporate purpose of the company.

This implies that the processing of personal data by the company shall have the following specific objectives:

- Fulfill service requests made by customers.
- Provide proper management to labor relation in particular to all matters concerning the signing of labor contracts and affiliation of workers to social security systems in health, pensions and occupational hazards.
- Provide proper handling trade relations with customers and suppliers of the company.
- Provide information and related services portfolio company material as well as updates, news and newsletters of interest to customers, upon acceptance expressed by them through which confirm their willingness to receive such content.

FIRST PARAGRAPH: Any amendment which is relevant for the purposes of treatment shall be notified to the holders of personal information and data collected by the firm or supplied to it by third parties or their representatives in the case of minors. Also, and with said change notification, ENTERPRISE MANAGEMENT SERVICES SAS request the respective holder's further authorization regarding the new intended purpose, without constituting an obligation to these signs said document in acceptance.

In the case where the holder of personal data is authorized by the new purpose of treatment, ENTERPRISE MANAGEMENT SERVICES SAS will continue to provide the previously authorized their personal data, without prejudice to the holder thereof to exercise their right to know treatment, correct, update or request the deletion of your data at any time.

TITLE VI - NOTICE OF PETITIONS, COMPLAINTS AND INQUIRIES

19. DESIGNATED AREA FOR THE ATTENTION OF PETITIONS, COMPLAINTS AND INQUIRIES: ENTERPRISE MANAGEMENT SERVICES SAS has appointed reception area and PQR management on treatment

personal to respond adequately and timely requests, inquiries and complaints that raise the holders of personal information and the company data.

Likewise, ENTERPRISE MANAGEMENT SERVICES SAS enabled telephone line 3776819 in the city of Barranquilla (Atlántico), through which it will be sent to the custom advisor attention petitions and complaints concerning personal data, who will provide information overall holders of personal data relating to the procedure to know, update, correct or request removal of personal data and to revoke the authorization for treatment. Information also may be obtained through communication sent via email to the following address: I servicios@ems.net.co

For its part, requests and complaints dealt with in Title VII of this PTIDP, shall be filed in writing at the offices of the company, located at Carrera 55 No 100-51 Office 601 Business Center Blue Gardens, City Barranquilla.

20. PERSONS TO WHOM THEY CAN PROVIDE INFORMATION: Under the terms of Article 13 of Law 1581 of 2012, information and data may be supplied by SAS ENTERPRISE MANAGEMENT SERVICES, upon written for the purpose, request the following persons:

- to. A respective owner, their heirs or their legal representatives.
- b. A public or administrative entities in the exercise of their functions.
- c. A third who have been expressly authorized by the owner of the data or by express statutory provision they are entitled to request information.

21. TERM FOR SOLVING QUERIES: In accordance with regulated in Article 14 of Law 1581 of 2012, ENTERPRISE MANAGEMENT SERVICES SAS is obliged to respond to the high consultation by the holders of personal data or their respective assignees efforts to consult and meet personal information processed in a maximum period of ten (10) business days from the date of filing the application. In the event that the company cannot meet the request within the period described above, will be obliged to notify the applicant of the reasons that led to the delay and, in any case, will respond to the request within five (5) days following the expiration of the first business days.

22. TERM FOR RESOLVING REQUESTS AND COMPLAINTS: Taking into account the provisions of paragraph 3 of Article 15 of Law 1581 of 2012, requests that are not related to demand for knowledge or consultation of information processed and claims that interposer holders or their respective assignees, they must be resolved by ENTERPRISE MANAGEMENT SERVICES SAS within no more than fifteen (15) days from the day following the date of its filing. In the event that the company cannot meet the request or complaint within the period described above, will be obliged to notify the applicant of the reasons that led to the delay and, in any case, will respond to the request within eight (8) business days following the expiration of the first term.

23. procedural requirement: ENTERPRISE MANAGEMENT SERVICES SAS warns the owners of the information of personal data and their respective successors that the interposition of queries, requests and complaints to the company is requirement

proceduralist to file a complaint before the Superintendency of Industry and Commerce against an alleged violation of the rights of the holders of information or personal data, so that the entity will process the complaints interposer without exhausting stage above prior. Above, in accordance with Article 16 enshrined in Law 1581 of 2012.

TITLE VII - PROCEDURE FOR THE PROCESSING OF PERSONAL DATA

24. GENERAL CONSIDERATIONS IN FRONT OF THE DATA PROCESSING AND PERSONAL DATA:

ENTERPRISE MANAGEMENT SERVICES SAS performs the collection of information and personal data over the documents

required for the provision of the services offered and contracted by their owners as clients, through the resumes submitted by workers in the process selection and documents necessary for linking them to different social security systems and occupational hazards.

Information and personal data collected by ENTERPRISE MANAGEMENT SERVICES SAS are stored in databases through a properly licensed software, which is supplied to the company by third parties specialized in the provision of such technology for the storage, management and safekeeping of tools data and information, with whom confidentiality agreements are signed in order to safeguard the contents of that and privacy and privacy of

the owners. Also, the company outsources services and information technology with properly trained to monitor the software and ensure proper operation of the third and detect threats or malware that might jeopardize the security of personal data processed at risk. With such providers,

25. PROCEDURE TO KNOW INFORMATION: Holders of information or data personal or their assignees respective may consult the personal information of the owner to rest in databases ENTERPRISE MANAGEMENT SERVICES SAS to do this, they can contact by telephone with the designated care of this type of applications area or may file written request to that on the premises of the company.

In case the application is made by telephone, ENTERPRISE MANAGEMENT SERVICES SAS, through its employees and their dependents, inform the applicant that the call may be recorded and monitored in order to keep test application and partial response or all that has been accorded to that.

Moreover, in the case where the application is filed in writing, the document must contain at least the full name of the holder and his identification number, full name and identification of the applicant, indicating the application of knowledge and access to information processed in a clear and concise reporting and data (address, phone, mobile phone or email).

ENTERPRISE MANAGEMENT SERVICES SAS shall reply to the request for consultation or knowledge of information within the term established in Title VI of this PTIDP, in line with the provisions of article 14 of Law 1581 of 2012.

26. PROCEDURE FOR PETITIONS AND COMPLAINTS BROUGHT: The holder of the information or personal data or their respective successors in interest may file a complaint with ENTERPRISE MANAGEMENT SERVICES SAS, in his dual capacity as responsible and accountable treatment, when they consider that the information contained in a database of company should be subject to correction, update, or delete or warn when an alleged breach of any of the duties contained in this PTIDP and Law 1581 of 2012, which will be processed under the following rules:

The complaint must be filed in writing and be addressed to ENTERPRISE MANAGEMENT SERVICES SAS, identifying the owner of the data and personal information full name and identification number must also contain a description of the facts on which the claim is based, the direction in which (the) applicant (s) will receive notifications and must be accompanied by documentary evidence that want to enforce.

In the event that the claim is received by a department, area or department of the company lacks jurisdiction to pursue the matter and resolve it, it shall transfer him who is responsible for a term not exceeding two (2) business days and shall inform the situation to the applicant.

Likewise, when the notice of claim does not have the described minimum elements in the first paragraph of this article, ENTERPRISE MANAGEMENT SERVICES SAS, through its subsidiaries and associates, will require the applicant within five (5) working days the filing of the complaint to remedy the faults or provide the documents as required. In any case, ENTERPRISE MANAGEMENT SERVICES SAS shall reply to the request or complaint within the term established in Title VI of this PTIDP, in line with the provisions of Article 15 of Law 1581 of 2012.

27. This PTIDP ENTERPRISE MANAGEMENT SERVICES SAS is effective as of January 1, 2016 and indefinitely, so its content requires the company to remain in force while contractual, commercial, labor relations or merely informative headlines information and personal data. The foregoing is without prejudice to the right of holders to request the revocation of the authorization for the processing of data and personal information.

In any case, even if there is a request for revocation of the authorization for treatment, ENTERPRISE MANAGEMENT SERVICES SAS warns that in accordance with the provisions of Title IV of this PTIDP, personal data will be retained when so required for compliance a legal obligation or contractual nature which have arisen between the company and the respective holder.

Finally, ENTERPRISE MANAGEMENT SERVICES SAS notes that reserves the right to make adjustments to the contents of this PTIDP when treatment activities and / or purpose of the processing of data and personal information change, or when regulatory changes in matter justified.

In any case, these changes will be properly communicated to the holders through efficient communication mechanisms commonly used in the ordinary course of commercial or promotional relationships they hold.

TITLE IX -Registration DATABASE IN THE NATIONAL REGISTRY OF DATABASES -

RNBD

GENERAL CONSIDERATIONS 28. RNBD: Under the terms of Article 3 of the Single Regulatory Decree 1074 of

2015, ENTERPRISE MANAGEMENT SERVICES SAS, as a legal entity of private law acts as responsible and in charge of data processing and information of a personal nature, must register the bases contentives data of such information in the National Register Database independently. Above, taking into account the terms and conditions of registration under Section 3 of Chapter 26 of the Single Regulatory Decree 1074 of 2015, article 2.2.2.26.3.2 states that will be the Superintendency of Industry and Commerce who will establish the procedure registration databases on the National Register of databases to be met by controllers,

So, the Superintendency of Industry and Commerce, using its regulatory power in date of November 3, 2015 it issued External Circular 002, through which he set "add the Second Chapter in Title V of the Single Circular of the Superintendence of Industry and Commerce, "and so regulated the procedure of registration of personal databases on the National Register of databases - RNBD - as well as procedures for updating and consultation.

29. CONSULTATION RNBD: Subject to the provisions of Article 2.2.2.26.1.4 Single Regulatory Decree 1074 of

2015, citizens may consult the National Register of Databases - RNBD - the minimum information provided for in Article 2.2.2.26.1 of this decree, "in order to facilitate the exercise of their right to know, update, rectify, delete the data and / or revoke the authorization."

30. MINIMUM OF RNBD: In accordance with the provisions of Article 2.2.2.26.2.1 Single Regulatory Decree 1074 of 2015, the minimum information that must contain the National Register of Databases - RNBD - is as follows:

- to. Identification data, location and contact of the controller base
data, in this case, ENTERPRISE MANAGEMENT SERVICES SAS, including its corporate name and tax identification number (NIT) being a legal person (Article 2.2.2.26.2.2 Single Regulatory Decree 1074 of 2015).
- b. Identification data, location and contact or treaters base
data, in this case, ENTERPRISE MANAGEMENT SERVICES SAS, in his dual capacity as responsible and in charge of processing the data and personal information, including your name or company name and tax identification number (TIN) for being a legal entity (Article 2.2.2.26.2.3 Single Regulatory Decree 1074 of 2015)
- c. Channels for holders exercise their rights, i.e., those identified in Chapters VI and VII of this PTIDP.

- d. Form of treatment of the database, that is, if the processing activities that are performed manually or automated.
- and. This PTIDP.

In parallel, the last paragraph of Article 2.2.2.26.2.1 Single Regulatory Decree 1074 of 2015 establishes that "[t] Superintendence of Industry and Commerce, as authority protection of personal data, will establish the National Register of Databases in addition to the minimum provided in this article, in exercise of the powers attributed the Law 1581 of 2012 in letter h) of Article 21 "information, power is the maid use by External Circular No. 002

November 3, 2015, including in Section 2.1. of that chapter as an additional minimum information to be provided on the National Register of Databases - RNBD - as follows:

F. Information stored in the database. g. Security measures of information. * h. Origin of personal data.

I. international transfers of personal data. j. international transfer of personal data.

k. Assignment or transfer national database.

l. Report new, differentiating between the claims submitted by operators * and security incidents *, which must be reported within the terms and opportunities established for it in paragraphs (I) and (ii) of subparagraph g) of Article

2.1 previously referenced.

* By express legal provision, the information related to security measures, claims submitted by operators and reported incidents are not available for public consultation.

FIRST PARAGRAPH: The extent of additional information before explicitly stated is that described in Article 2.1 of Chapter II of Title V of the Circular of the Superintendence of Industry and Commerce, added by External Circular No. 002 of November 3, 2015.

31. PROCEDURE FOR REGISTRATION IN THE RNBD: Despite it suggested by the Superintendency of Industry and Commerce in Article 2.2 schedule. Chapter Two of Title V of the Circular of the Superintendence of Industry and Commerce, added by means of External Circular No. 002 of November 3, 2015, ENTERPRISE MANAGEMENT SERVICES SAS will register their databases on the National Register of Databases data - RNBD

- within a period of one (1) year from the day following the date on which the Superintendence of Industry and Commerce authorized any such registration. Above, subject to regulated in Article

2.2.2.26.3.1 Single Regulatory Decree 1074 of 2015.

Registration databases of the company will be in accordance with the instructions contained in the "National Register User Database -RNBD- Manual" published on the website of the Superintendence of Industry and Commerce.

32. UPDATING THE INFORMATION CONTAINED RNBD: In accordance with Article 2.3 of Chapter II of Title V of the Circular of the Superintendence of Industry and Commerce, added by means of External Circular No 002 of 3

November 2015, ENTERPRISE MANAGEMENT SERVICES SAS will update the information contained in the RNBD, as follows:

m. Within the first ten (10) working days of each month, when substantial changes are made to the recorded information.

n. Annually, between two (2) January thirty-one (31) March from 2018.

or. Within fifteen (15) first working day of the months of February and August of each year from registration, for information on claims submitted by holders referred to in paragraph (l) of subparagraph g) Article 2.1 of that standard, the first report must be made in the first half of 2017, with for the second half of 2016 information.

FIRST PARAGRAPH: For purposes of paragraph (l) described above shall mean substantial changes described in the second paragraph of Section 2.3 in Chapter Two of Title V of the Circular of Industry and Commerce, added by External Circular No 002 November 3, 2015.

Sincerely,

RODOLFO ACUÑA HIGGINS

Legal representative

SAS ENTERPRISE MANAGEMENT SERVICES

NIT 900233015-5