

Grupo ORBIS S.A.*, its subsidiaries**, from now on and for the effects of this policy called the Companies, present stakeholders their Personal Data Protection Policy.

The personal data held in custody by the Companies, in their condition of responsible and/or controller, as the case may be, will be treated in compliance with the principles and regulations foreseen under Colombian Law, existing national legislation and best practices applicable to data protection regime, in accordance with the Personal Data Protection Policy defined below.

The personal data held by the Companies will be processed in accordance with the following general purposes:

- Compliance with obligations and/or commitments derived from contractual relations, or not, existing with stakeholders.
- Compliance with legal obligations that involve personal data of stakeholders.
- Commercial management and relations with stakeholders.
- Prospective analysis of tendencies and preferences of stakeholders in relation to their goods and services.
- Find out, prospectively, stakeholder needs in order to innovate and satisfy them.
- Communicate to stakeholders information about goods, services, publications, training events, company activities and publicity associated to their business activity be it related to goods and/or services.
- Inform stakeholders of activities associated to corporate social responsibilities.
- Processing by the controlling company or associated companies in virtue of societal, contractual, or legal relations.
- Share amongst themselves or third parties and provide data about compliance or noncompliance of legal and contractual obligations either directly or through the public entities responsible for surveillance and control.

Any person that is part of the group of stakeholders, either as titleholder or legally authorized in relation to the treatment of personal data, has a right to execute the rights the law provides in reference to the protection of personal data and habeas data, which are:

- Access, update, correct and remove their personal data with those Responsible for Processing or that Control Processing. This right may be executed, amongst others, in relation to partial, inexact, incomplete, fragmented, error inducing data or that for which Processing is expressly prohibited or has not been authorized.
- Request proof of authorization given to those Responsible for Processing, except when expressly excluded as a requirement for Processing, in compliance with article 10 of Law 1581 of 2012.
- Be informed by those Responsible for Processing or Control Processing, through previous request, about the use that has been given to their personal data.
- Present before the Colombian Superintendence of Industry and Commerce (Superintendencia de Industria y Comercio) complaints about infractions to the content of Law 1581 of 2012 and any other norms that may modify, add to, or complement it.
- Withdraw consent and/or request suppression of data when Processing does not respect constitutional and legal principles, rights and guarantees. The withdrawal and/or suppression will be carried out when the Colombian Superintendence of Industry and Commerce has determined that in Processing the Responsible or Controlling party has incurred in illegal or unconstitutional conduct.
- Have free access to their personal data that has been subject to Processing.

Permanence of the personal data in the databases will be equal to the period attributed to the purpose or purposes of processing, which will be, in any case, a reasonable duration.

In each business process in accordance with the personal data collected and the processing to be carried out, the specific purposes for said processing will be previously explained in the respective privacy notice, without prejudice of processing authorized by law.

For the exercise of habeas data, the titleholder of the personal data or whoever demonstrates legitimate interest as per the content of existing law may do so by filling out the online form in the personal data protection section available at www.grupo-orbis.com. Whoever exercises the right of habeas data must accurately provide the contact information requested for the effects of carrying out and attending said request and taking the necessary measures to exercise those rights.

Once the request is received for exercising Habeas Data, the Companies will give a reply in the legal term of fifteen (15) days, period which may be prolonged another eight (8) days, previous communication with whoever exercised this right, in accordance with the law.

The processing of personal data that may be carried out by the Companies in accordance with this policy, will be done so based on the norms, procedures and guidelines adopted by this institution for compliance with applicable legislation for the protection of personal data

*For the effects of this policy the Orbis Foundation is part of Grupo Orbis S.A.

**Grupo Orbis' subsidiaries - Pintuco S.A., Cacharrería Mundial S.A.S., Andercol S.A., Inproquim S.A.S., Centro de Servicios Mundial SAS, O-tek Internacional SA, Inversiones MLCW S.A.S.