

The company **GLAMPING LA CEPA**, identified with Nit. 901461690 – 8, located in El Peñol, Antioquia, Colombia, has developed this policy in compliance with the provisions of Law 1581 of 2012, which dictates general provisions for the protection of personal data in Colombia, which informs its customers, suppliers, employees, and the general public, in order to provide sufficient information about the content of the "**INFORMATION PROCESSING POLICIES**", which may highlight the following:

## CHAPTER I

### DEFINITIONS

- **National Authority for the Protection of Personal Data:** It is the Superintendence of Industry and Commerce - Delegation for the Protection of Personal Data.
- **Authorization:** Prior, express and informed consent of the Data Subject to carry out the Processing of personal data.
- **Database:** An organized set of personal data that is subject to Processing.
- **Personal data:** Any information linked or that may be associated with one or more specific or determinable natural persons.
- **Sensitive Personal Data:** this is personal data that is particularly protected, as it affects the privacy of the owner and its treatment may generate discrimination. It may NOT be subject to processing unless it is required to safeguard a vital interest of the owner or the owner is incapacitated and its obtaining has been expressly authorized. (e.g. racial or ethnic origin, political orientation, religious or philosophical beliefs, membership of trade unions, social organizations, human rights, biometric data, health).
- **Data Processor:** A natural or legal person, public or private, who, alone or in association with others, carries out the Processing of personal data on behalf of the Data Controller.
- **Data Controller:** A natural or legal person, public or private, who, on its own or in association with others, decides on the database and/or the Processing of data.
- **Owner of the Information:** Natural person whose personal data is subject to Processing. For example: customer, supplier, employee, etc.
- **Processing:** Any operation or set of operations on personal data, such as collection, storage, use, circulation or erasure.
- **Transfer:** Data Transfer takes place when the Data Controller and/or Data Processor, located in Colombia, sends the information or personal data to a recipient, who is also a Data Controller and is located inside or outside the country.
- **Transmission:** Processing of personal data that involves the communication of the same within or outside the territory of the Republic of Colombia when it is intended to carry out a Processing by the Processor on behalf of the responsible party.

### CONTENTS OF THE DATABASES

The databases of GLAMPING LA CEPA that are subject to processing and storage of personal information of the owners, such as name, number and type of identification, contact details: physical and electronic address, landline and mobile phone, etc. Depending on the purpose and nature of the databases, other specific types of data are also processed, i.e. in the database of employees and contractors, information on work and academic history, as well as family, personal and, possibly, banking information.

### TREATMENT

The information contained in the databases of GLAMPING LA CEPA is subject to different forms of processing, such as: collection, exchange, updating, processing, reproduction, correction, use, organization, storage, circulation or deletion, among others, all of the above in compliance with the purposes and objectives established in this Personal Data Processing Policy.

The referenced information may be delivered, transmitted or transferred to judicial or administrative entities when required by law and GLAMPING LA CEPA will record this fact.

It may also be transmitted or transferred to the owners, their successors and legal representatives. In any case, the delivery, transmission or transfer will be made after signing the commitments that are necessary to safeguard the confidentiality and privacy of the information authorized to be processed.

GLAMPING LA CEPA will ensure the correct use of minors' personal data, ensuring that the applicable legal requirements are complied with and that any processing is previously authorized and justified in the best interests of minors.

### **PURPOSE**

- Use the data necessary for contractual relations with customers, with the aim of developing the contractual relationship that may be established with the Owner of the Information, either directly or on behalf of the Data Controller.
- For the labor relations that exist with its employees and the fulfillment of the obligations with them.
- Data necessary for the provision of services.
- Sending Advertising, Surveys, and Promotions.

### **AUTHORIZATION**

Without prejudice to the exceptions provided for in the Law, the processing requests prior and express authorization from the owner, which must be obtained by any means that may be subject to subsequent consultation.

### **RIGHTS OF THE OWNERS**

As set forth in Article 8 of Law 1581 of 2012, the owner of the personal data shall have the following rights:

1. Know, update and rectify your personal data vis-à-vis the Data Controllers or Data Processors. This right may be exercised, among others, in the case of partial, inaccurate, incomplete, fragmented, misleading data, or data whose Processing is expressly prohibited or has not been authorised.
2. Request proof of the authorization granted to the Data Controller, except when expressly excepted as a requirement for the Processing.
3. Be informed by the Data Controller or the Data Processor, upon request, regarding the use they have made of their personal data.
4. Submit complaints to the Superintendence of Industry and Commerce for violations of the provisions of this law and the other regulations that modify, add or complement it.
5. Revoke the authorisation and/or request the deletion of the data when the Processing does not respect the principles, rights and constitutional and legal guarantees. The revocation and/or suppression will proceed when the Superintendence of Industry and Commerce has determined that in the Processing the Responsible or Responsible Party has incurred in conduct contrary to this law and the Constitution;
6. Access free of charge to your personal data that has been subject to Processing.

### **DUTIES OF THE CONTROLLER**

According to Article 17 of Law 1567 of 2012, the data controller must comply with the following duties:

1. Guarantee to the Holder, at all times, the full and effective exercise of the right of habeas data.
2. Request and keep, under the conditions provided for in this law, a copy of the respective authorization granted by the Owner.
3. Duly inform the Data Controller about the purpose of the collection and the rights that assist him by virtue of the authorization granted.
4. To keep the information under the necessary security conditions to prevent its adulteration, loss, consultation, unauthorized or fraudulent use or access.
5. Ensure that the information provided to the Data Processor is truthful, complete, accurate, up-to-date, verifiable and understandable.
6. Update the information, communicating in a timely manner to the Data Processor, all the news regarding the data previously provided and adopt the other necessary measures to keep the information provided to the latter updated.
7. Rectify the information when it is incorrect and communicate the pertinent information to the Data Processor.
8. Provide the Data Processor, as the case may be, only with data whose Processing is previously authorized in accordance with the provisions of this law.
9. Require the Data Processor to respect the security and privacy conditions of the Owner's information at all times.
10. To process queries and claims made in the terms indicated in this law.
11. Adopt an internal manual of policies and procedures to ensure adequate compliance with this law and, in particular, for dealing with queries and complaints.
12. Inform the Data Processor when certain information is under discussion by the Data Controller, once the claim has been submitted and the respective procedure has not been completed.
13. Inform, at the request of the Owner, about the use made of their data.
14. Inform the data protection authority when there are violations of security codes and there are risks in the management of the Holders' information.
15. Comply with the instructions and requirements issued by the Superintendence of Industry and Commerce.

### **DUTIES OF THE DATA PROCESSOR**

According to Article 18 of Law 1567 of 2012, the data processor must comply with the following duties:

1. Guarantee to the Holder, at all times, the full and effective exercise of the right of habeas data.

2. To keep the information under the necessary security conditions to prevent its adulteration, loss, consultation, use or unauthorized or fraudulent access.
3. To carry out the updating, rectification or deletion of the data in a timely manner under the terms of this law.
4. Update the information reported by the Data Controllers within five (5) business days of receipt.
5. To process the queries and claims made by the Holders in the terms indicated in this law.
6. Adopt an internal manual of policies and procedures to ensure proper compliance with this law and, in particular, for the attention of queries and claims by the Holders.
7. Register in the database the legend "claim in process" in the manner regulated by this law.
8. Insert in the database the legend "information under judicial discussion" once notified by the competent authority about legal proceedings related to the quality of the personal data.
9. Refrain from circulating information that is being disputed by the Owner and whose blocking has been ordered by the Superintendence of Industry and Commerce.
10. Allow access to information only to people who can have access to it.
11. Inform the Superintendence of Industry and Commerce when there are violations of security codes and there are risks in the management of the information of the Holders.
12. Comply with the instructions and requirements issued by the Superintendence of Industry and Commerce.

#### **VALIDITY**

This Policy for the Processing of Personal Data is effective as of December 11, 2023.

The databases in which personal data are recorded will be valid for the same time as the information is kept and used for the purposes described in this policy. Once that purpose(s) is fulfilled and as long as there is no legal or contractual duty to retain your information, the use of the data will be suspended.

#### **CONSULTATIONS**

The owners of the personal data that make up the GLAMPING LA CEPA databases, or their successors and representatives, will be able to consult them.

Any request for consultation, correction, update or deletion must be submitted in writing or by e-mail. Inquiries will be addressed within ten (10) business days from the date of receipt of the respective request. When it is not possible to respond to the query within this period, the interested party will be informed, stating the reasons for the delay and indicating the date on which the query will be addressed, which in no case may exceed five (5) business days following the expiration of the first term.

#### **CLAIMS**

In the case of complaints, these must be made in physical writing or by e-mail, which must contain at least the following: identification of the owner, description of the facts giving rise to the claim, address of the owner and documents that serve as evidence.

If the complaint is incomplete, the interested party will be required within five (5) days of receipt of the complaint to correct the defects. If two (2) months have elapsed from the date of the request, without the applicant submitting the required information, it will be understood that the claim has been withdrawn.

The maximum term to address the claim will be fifteen (15) business days from the day following the date of receipt. When it is not possible to attend to the claim within this period, the interested party will be informed of the reasons for the delay and the date on which their claim will be addressed, which in no case may exceed eight (8) business days following the expiration of the first term.