

## **POLICY DATA PROCESSING POLICY**

### **1. GENERAL CONSIDERATIONS**

Article 15 of the Constitution of the Republic of Colombia establishes the right of any person to know, update and rectify the personal data that exist about him or her in data banks or archives of public or private entities. Likewise, it orders those who have personal data of third parties to respect the rights and guarantees provided for in the Constitution when this type of information is collected, processed, and circulated.

Likewise, in balance, justice, and equity to the article 15, article 20 of the Constitution of the Republic of Colombia enshrines the right of any person, responsible or in charge, to receive truthful and impartial information.

**KEDRION COLOMBIA S.A.S.** is committed to compliance with the regulations on the protection of personal data and respect for the rights of the Holders of the information. Therefore, it adopts the following **Personal Data Processing Policy** of imperative application in all activities involving the processing of personal data and mandatory compliance by the organization, its administrators, employees, and public servants.

### **2. OBLIGATION**

This policy is mandatory and strict compliance by **KEDRION COLOMBIA S.A.S.**<sup>1</sup>, its workers, contractors, and, in general, any third party that maintains a contractual or legal link with **KEDRION COLOMBIA S.A.S.** and that, because of this, it has access to information of the organization.

All employees of **KEDRION COLOMBIA S.A.S.** They must observe and respect this policy in the performance of their duties.

### **3. DEFINITIONS**

- **Anonymization:** Technical or technological mechanism by means of which a data of a private, semi-private or sensitive nature is concealed, pixelated, blurred, or concealed. An "anonymous data" does not reasonably establish to which natural person it refers, links or associates; So, such information is not personal data. Personal data that has been subject to anonymization, encryption, pseudonymous or that, by any means, technology, or process, is dissociated or disassociated from a natural person, but which can be used to re-identify that person, remains personal data.
- **Application or App:** Any type of program, or software development designed to run on any computer hardware element, such as a desktop, laptop, or mobile device.

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<sup>1</sup> Third paragraph of article 25 of Statutory Law 1581 of 2012 and article 2.2.2.25.3.1. of the Single Regulatory Decree 1074 of 2015.

- **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 treatment. This can be written, verbal or through unequivocal conduct that allows to conclude, in a reasonable way, that the Holder granted authorization
- **Privacy Notice:** Communication, verbal or written, generated by the Responsible or Manager, addressed to the Owner for the processing of their personal data, through which they are informed about the existence of the information processing policies that will be applicable, how to access them and the purposes of the treatment that is intended to give to personal data.
- **Databases:** Organized set of personal data that is subject to treatment.
- **Electronic access channel:** These are those ways in which personal information is collected or stored, such as web pages, mobile devices and telephone support, among others.
- **Consultation:** Request of the Owner of the data or the persons authorized by it or by law to know the information that rests on it in databases or files.
- **Personal data:** Any information linked or that can be associated with one or more determined or determinable natural persons. These data are classified into sensitive, public, private, and semi-private.
- **Sensitive personal data:** Information that affects the privacy of the person or whose misuse may generate discrimination, such as those that reveal racial or ethnic origin, political orientation, religious or philosophical convictions, membership of trade unions, social organizations, human rights, that promotes the interests of any political party or that guarantee the rights and guarantees of opposition political parties, as well as data relating to health, sex life and biometric data (fingerprints, among others).
- **Public personal data:** It is the data qualified as such according to the mandates of the law or the Political Constitution and all those that are not semi-private or private. They are public, among others, the data contained in public documents, public registers, gazettes and official gazettes, duly enforceable judicial judgments that are not subject to confidentiality, those relating to the civil status of persons, their profession or trade and their quality as a merchant or public servant. The personal data existing in the commercial register of the Chambers of Commerce are also public (Article 26 of the Commercial Code). Likewise, public data are those that, by virtue of a decision of the Holder or a legal mandate, are in files of free access and consultation. These data can be obtained and offered without reservation and regardless of whether they refer to general, private, or personal information.
- **Private personal data.** It is the data that, due to its intimate or reserved nature, is only relevant for the person Owner of the data. For example: merchants' books, private documents, information extracted from the home inspection.
- **Semi-private personal data.** It is semi-private the data that does not have an intimate, reserved, or public nature and whose knowledge or disclosure may be of interest, not only to its Holder, but to a certain sector or group of people or to society in general, such as, among others, the data referring to the fulfillment and non-compliance of financial obligations or data related to relations with social security entities.

- **Data processor:** person, natural or legal, who carries out the processing of data on behalf of the data controller.
- **Claim:** request of the Data Subject or the persons authorized by him or by law to correct, update or delete his personal data or when they notice that there is an alleged breach of the data protection regime, according to article 15 of Law 1581 of 2012.
- **Responsible for the treatment:** Person, natural or legal, who decides on the processing of personal data.
- **Owner of the data:** It is the natural person to whom the information refers.
- **Processing:** Any operation or set of operations on personal data such as, but not limited to, the collection, storage, use, circulation, or deletion of such information.
- **Transmission:** Processing of personal data that involves the communication of the same within (national transmission) or outside Colombia (international transmission) and that aims to carry out a treatment by the Person in Charge, on behalf of the Responsible.
- **Transfer:** The transfer of data takes place when the Responsible or in charge of the processing of personal data, located in Colombia, sends the information or personal data to a recipient, who, in turn, is responsible for the treatment, being able to be located inside or outside the country.
- **Procedural requirement:** The Holder or successor in title may only file a complaint with the Superintendence of Industry and Commerce once the consultation or claim process has been exhausted before the Responsible or Person in Charge of the Treatment, the above according to article 16 of Law 1581 of 2012.

#### 4. PRINCIPLES FOR THE PROCESSING OF PERSONAL DATA

The processing of personal data must be carried out in compliance with the general and special rules on the subject and for activities permitted by law.

In the development, interpretation and application of this policy, the following principles will be applied in a harmonious and comprehensive manner:

##### 4.1. *Principles related to the collection of personal data*

- **Principle of freedom<sup>2</sup>:** Unless otherwise lawed, the collection of data can only be exercised with the prior, express, and informed authorization of the Owner. Personal data may not be obtained or disclosed without the prior consent of the Owner, or in the absence of a legal or judicial mandate that relieves consent.

The Data Subject must be informed in a clear, sufficient and prior manner about the purpose of the information provided and, therefore, data may not be collected without the clear specification about the purpose thereof.

<sup>2</sup> Literal c) of article 4 of the Statutory Law 1581 of 2012.

The principle of freedom must be observed both in the case of data collected through formats and those that are part of the annexes or documents delivered by the Data Subjects to **KEDRION COLOMBIA S.A.S.**

- **Principle of limitation of collection<sup>3</sup>:** Only personal data that are strictly necessary for the fulfillment of the purposes of the treatment should be collected, in such a way that the registration and disclosure of data that are not closely related to the purpose of the treatment is prohibited. Accordingly, every reasonable effort should be made to limit the processing of personal data to the minimum necessary. That is, the data must be: (i) adequate, (ii) relevant and (iii) consistent with the purposes for which they were intended.

#### ***4.2. Principles related to the use of personal data***

- **Principle of purpose<sup>4</sup>:** The treatment must obey a legitimate purpose in accordance with the Constitution and the Law, which must be informed to the Holder. The Data Subject must be informed in a clear, sufficient, and prior manner about the purpose of the information provided and, therefore, data may not be collected without a specific purpose.
- **Principle of temporality<sup>5</sup>:** Personal data will be kept only for the reasonable and necessary time to fulfill the purpose of the treatment and the legal requirements or instructions of the surveillance and control authorities or other competent authorities. The data will be kept when this is necessary for compliance with a legal or contractual obligation. To determine the term of the treatment, the rules applicable to each purpose and the administrative, accounting, fiscal, legal and historical aspects of the information will be considered.

#### ***4.3. Principles related to information quality***

- **Principle of veracity or quality<sup>6</sup>:** The information subject to treatment must be truthful, complete, accurate, updated, verifiable and understandable. The processing of partial, incomplete, fractional, or misleading data is prohibited. Reasonable steps should be taken to ensure that the data are accurate and sufficient, when requested by the Owner or when **KEDRION COLOMBIA S.A.S.** determine it, are updated, rectified, or deleted when appropriate.

#### ***4.4. Principles relating to the protection, access, and circulation of personal data***

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<sup>3</sup> Article 2.2.2.25.2.1. of the Single Regulatory Decree 1074 of 2015.

<sup>4</sup> Literal b) of article 4 of the Statutory Law 1581 of 2012.

<sup>5</sup> Article 2.2.2.25.2.8. of the Single Regulatory Decree 1074 of 2015.

<sup>6</sup> Literal d) of article 4 of the Statutory Law 1581 of 2012.

- **Principle of security<sup>7</sup>:** Each person linked to **KEDRION COLOMBIA S.A.S.** It must comply with the technical, human, and administrative measures established by the organization to provide security to personal data avoiding its adulteration, loss, consultation, use or unauthorized or fraudulent access.
- **Principle of transparency<sup>8</sup>:** In the treatment, the right of the Owner to obtain, at any time and without restrictions, information about the existence of data concerning him must be guaranteed.
- **Principle of restricted access:** <sup>9</sup>Access to personal data will only be allowed to the following persons:
  - ✓ To the Owner of the data.
  - ✓ To the persons authorized by the Data Subject.
  - ✓ To persons who, by legal mandate or court order, are authorized to know the information of the Owner of the data.
- **Principle of restricted circulation:** <sup>10</sup>Personal data may only be sent or supplied to the following persons:
  - To the Owner of the data.
  - To the persons authorized by the Data Subject.
  - To public or administrative entities in the exercise of their legal functions or by court order.
- **Principle of confidentiality<sup>11</sup>:** All persons involved in the processing of personal data are obliged to guarantee the confidentiality of the information, even after the end of their relationship with any of the tasks that comprise the treatment or culminated their contractual relationship or legal link with **KEDRION COLOMBIA S.A.S.** and may only supply or communicate personal data when this corresponds to the development of the activities authorized by law.
- **Principle of legality in matters of Personal Data Processing<sup>12</sup>:** The Processing of Personal Data is a regulated activity that must be subject to the provisions of the applicable law, in the other provisions that develop it and in this Policy.

## 5. TREATMENT TO WHICH THE PERSONAL DATA WILL BE SUBMITTED AND THE PURPOSE THEREOF

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<sup>7</sup> Literal g) of article 4 of the Statutory Law 1581 of 2012.

<sup>8</sup> Literal e) of article 4 of the Statutory Law 1581 of 2012.

<sup>9</sup> Literal f) of article 4 of the Statutory Law 1581 of 2012.

<sup>10</sup> Literal f) of article 4 of the Statutory Law 1581 of 2012.

<sup>11</sup> Literal h) of article 4 of the Statutory Law 1581 of 2012.

<sup>12</sup> Literal a) of article 4 of the Statutory Law 1581 of 2012.



**KEDRION COLOMBIA S.A.S.** will carry out the Treatment (collection, storage, circulation, transmission, transfer, and use, among others) of personal data in accordance with the conditions established by the Owner, the law or the Authorities to fulfill, in particular, the activities of its corporate purpose, mission and vision.

For the fulfillment of its functions, it may process personal data for the contracting, execution and development of the services offered to the public by the organization.

The processing of personal data may be carried out through physical, automated, or digital means, according to the type and manner of collection of personal information.

**KEDRION COLOMBIA S.A.S.** may also process personal data, among others, for the following purposes:

- Exercise their right to sufficiently know the Holder who intends to have a service offered by the organization or carry out any procedure through it, provide services, and assess their efforts. Carry out the pertinent activities for the development of the pre-contractual, contractual, and post-contractual stage with **KEDRION COLOMBIA S.A.S.**, as well as complying with Colombian or foreign law and the orders of judicial or administrative authorities.
- Carry out statistical activities, user service, advertising activities and calls, directly or through third parties, derived from any legal or contractual link whose purpose is to exercise functions assigned by **KEDRION COLOMBIA S.A.S.** conducive to the fulfillment of its corporate purpose.
- Implement relationship strategies with users, suppliers and other third parties with whom the organization has contractual or legal relationships.
- Make invitations to events, improve services, or offer new procedures and services, and all those activities associated with the mission and vision of **KEDRION COLOMBIA S.A.S.**
- Manage procedures (requests, requests, complaints, claims) and carry out satisfaction surveys regarding the procedures and services offered by **KEDRION COLOMBIA S.A.S.**
- Disclose, transfer, or transmit personal data, inside and outside the country, to the affiliates or subsidiaries of **KEDRION COLOMBIA S.A.S.** or to third parties because of a contract, law or lawful link that requires it or to implement cloud computing services or other specific services.
- Know, store, and process all the information provided by the Data Subjects in one or more databases, in the format it deems most convenient.
- Perform all tax, accounting, tax, and billing procedures, where applicable.

The data collected or stored about the contractors of **KEDRION COLOMBIA S.A.S.** Through the completion of forms, by telephone, or with the delivery of documents (resumes, annexes) will be treated for everything related to labor issues of a legal or contractual nature. By virtue of the foregoing, **KEDRION COLOMBIA S.A.S.** will use personal data for the following purposes:

- Comply with laws such as, among others, labor law, social security, pensions, professional risks, family compensation funds (Comprehensive Social Security System) and taxes.
- Comply with the instructions of the competent judicial and administrative authorities.
- Implement labor and organizational policies and strategies.

In addition to the above, the data may also be processed for the following purposes:

- Order, catalog, classify, divide, or separate the information provided by the Data Subjects.
- Verify, corroborate, verify, validate, investigate, or compare the information provided by the Data Subjects, with any information legitimately available.
- Access, consult, compare, and evaluate all the information that about the Holder is stored in the databases of judicial, fiscal, disciplinary or security records, of a state or private, national, or foreign nature, or any public or private database when the constitution or the law so requires.
- For purposes of safety of persons, property, and facilities of **KEDRION COLOMBIA S.A.S.**, may be used as evidence in any type of process, the personal data that are: (i) collected directly at the security points, (ii) taken from the documents provided by the Holders to security personnel and, (iii) obtained from the video recordings that are made inside or outside the facilities of **KEDRION COLOMBIA S.A.S.**

Personal data related to health are considered sensitive data, which is why it is optional for the Owner to manage and provide this information through the different tools and channels of **KEDRION COLOMBIA S.A.S.**, who will only process this sensitive data to:

- Exercise control over the state of health of the personnel in charge, contractors, or users on the occasion of specific events or situations that merit it,
- To carry out a specific procedure that requires it, with the express authorization of the Owner of the Information,
- Provide them when required by a competent authority in the exercise of its functions.

In any case, the Owner has control over the processing of such data and, at any time, may request its correction, updating or deletion.

- With respect to the Processing of biometric data, **KEDRION COLOMBIA S.A.S.** may collect biometric personal information such as fingerprints, photographs of the face (*selfie*), iris, cadences, voice, signature, facial recognition, or morphological features, among others, (hereinafter the "biometric data") in order to allow the identification of users or Holders, in accordance with the security parameters established in the regulation, good practices and those indicated by the authorities. These biometric data are considered by the Colombian regulation as sensitive data.

The collection of this information is done in compliance with legal obligations such as that indicated in article 2.2.17.6.6. of Decree 1413 of 2017:

**"Article 2.2.17.6.6. Information Security.** *The actors that process information, within the framework of this title, must adopt the appropriate, effective, and verifiable security measures that allow them to demonstrate the correct compliance with the good practices set forth in the information security and privacy model issued by the Ministry of Information Technologies and Communications, or a certifiable information security management system. This in order to safeguard the confidentiality, integrity and availability of information assets."*

In addition to the above, the Ministry of Information and Communications Technologies has recommended the implementation of biometric identification as an information security mechanism:

- "Companies must identify their vulnerabilities and implement protective measures. Develop a safety culture and corporate security policy.*
- Establish a mindset that safety should be a priority*
- Implement data analytics to protect sensitive information (establish automated ways to analyze and monitor large volumes of data)*
- Manage identities and authorizations*
- Take advantage of the built-in capabilities of mobile devices (advanced authentication through biometric techniques of voice recognition, signature, and facial recognition)*
- Continuous monitoring and evaluation*
- Isolate and hide terminal devices"<sup>13</sup>*

In compliance with article 6 of Decree 1377 of 2013, users or Holders will not be obliged, in any way, to provide their biometric data in accordance with the provisions herein. In those cases in which the Holders choose not to authorize the use and Treatment of their biometric data to **KEDRION COLOMBIA S.A.S.**, according to this policy, it is clear that the organization will not be able to allow access to and use of certain services to people who refuse to provide their biometric data.

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<sup>13</sup> Taken from: <https://www.mintic.gov.co/portal/604/w3-article-15301.html>



Likewise, **KEDRION COLOMBIA S.A.S.** It informs that not every photograph or fingerprint is considered as a biometric and sensitive data. The Superintendence of Industry and Commerce specified the above in the Concept with filing number 17-299565-2:

*"Personal data such as the fingerprint and images of the Data Controllers are considered biometric and sensitive data when they are processed by specific technical means that allow the identification or unique authentication of a natural person. Otherwise, it will be private personal data."*

Therefore, the collection and processing of fingerprints or images that are not considered as biometric data will be treated in accordance with the general purposes indicated in this Policy and the specific provisions on sensitive data will not be applicable to them.

## 6. RIGHTS OF DATA SUBJECTS

The Holders of the information have the right to:

- Access, Rectify, Cancel, Oppose.
- Know, update, and rectify personal data. For this purpose, it is necessary to previously establish the identification of the person to prevent unauthorized third parties from accessing the data of the Holder.
- Obtain a copy of the authorization.
- Find out about the use of **KEDRION COLOMBIA S.A.S.** has given to the personal data of the Holder.
- Process queries and claims following the guidelines established by law and in this policy.
- Access the request for revocation of the authorization or deletion of personal data when the Superintendence of Industry and Commerce has determined that in the treatment by **KEDRION COLOMBIA S.A.S.** conduct contrary to Law 1581 of 2012 or the Constitution has been incurred.

The Owner may also revoke the authorization and request the deletion of the data when there is no legal or contractual duty that imposes the obligation to remain in the database or file of the Responsible or Manager.

The request for deletion of the information and the revocation of the authorization will not proceed when the Owner has a legal or contractual duty to remain in the database of the Responsible or Responsible.

- Access your personal data free of charge. The information requested by the Owner may be provided by any means, including electronic.

## **7. DUTIES OF KEDRION COLOMBIA S.A.S. WHEN ACTING AS RESPONSIBLE FOR THE PROCESSING OF PERSONAL DATA**

All those obliged to comply with this policy must bear in mind that **KEDRION COLOMBIA S.A.S.** It is obliged to fulfill duties imposed by law. Therefore, they must act in such a way that they fulfill the following obligations:

### ***7.1. Duties of KEDRION COLOMBIA S.A.S. with respect to the Holder of the personal data***

- Guarantee the Holder, always, the full and effective exercise of the right of habeas data, that is, to know, update or rectify their personal data.
- Request and keep, under the conditions provided in this policy, a copy of the respective authorization granted by the Holder.
- Inform the Holder, in a clear and sufficient manner, about the purpose of the collection and the rights that assist him by virtue of the authorization granted.
- Inform, at the request of the Owner, about the use given to their personal data.
- Process the queries and claims formulated in the terms indicated in this policy.

### ***7.2. Duties of KEDRION COLOMBIA S.A.S. regarding the quality, security, and confidentiality of personal data***

- Observe the principles of truthfulness, quality, security, and confidentiality in the terms established in this policy.
- Keep the information under the necessary security conditions to prevent its adulteration, loss, consultation, use or unauthorized or fraudulent access.
- Update information when necessary.
- Rectify personal data when appropriate.
- Anonymize the personal data of the Holders whenever they are semi-private, private or sensitive, as well as the data of children and adolescents of any category.

### ***7.3. Duties of KEDRION COLOMBIA S.A.S. when carrying out the treatment through a manager***

- Provide the Data Processor with only the personal data whose treatment is previously authorized.
- Ensure that the information provided to the Data Processor is true, complete, accurate, updated, verifiable and understandable.
- Communicate to the Data Processor, in a timely manner, all the news regarding the data previously provided and adopt the other necessary measures so that the information provided to it is kept updated.
- Communicate to the Data Processor, in a timely manner, the rectifications made on the personal data so that it can proceed to make the relevant adjustments.
- Require the Data Processor, always, to respect the security and privacy conditions of the Owner's information.
- Inform the Data Processor when certain information is under discussion by the Holder once the claim has been filed and the respective procedure has not been completed.

#### ***7.4. Duties of KEDRION COLOMBIA S.A.S. with respect to the Superintendence of Industry and Commerce***

- Inform the Superintendence of Industry and Commerce when there are violations of security codes and there are risks in the administration of the information of the Holders.
- Comply with the instructions and requirements issued by the Superintendence of Industry and Commerce.

### **8. DUTIES OF KEDRION COLOMBIA S.A.S. WHEN ACTING AS A PERSON IN CHARGE OF THE PROCESSING OF PERSONAL DATA**

Yes **KEDRION COLOMBIA S.A.S.** performs data processing on behalf of another entity or organization (Data Controller) must comply with the following duties:

- Guarantee the Holder, at all times, the full and effective exercise of the right of habeas data.
- Keep the information under the necessary security conditions to prevent its adulteration, loss, consultation, use or unauthorized or fraudulent access.
- Timely update, rectification, or deletion of data.
- Update the information reported by the Data Controllers within five (05) business days from its receipt.

- Process the queries and claims made by the Holders in the terms indicated in this policy.
- Register in the database the legend "*claim in process*" in the manner established in this policy.
- Insert in the database the legend "*information under judicial discussion*" once notified by the competent authority about judicial processes related to the quality of personal data.
- Refrain from circulating information that is being controversial by the Holder and whose blocking has been ordered by the Superintendence of Industry and Commerce.
- Allow access to information only to persons authorized by the Owner or empowered by law for that purpose.
- Inform the Superintendence of Industry and Commerce when there are violations of security codes and there are risks in the administration of the information of the Holders.
- Comply with the instructions and requirements issued by the Superintendence of Industry and Commerce.

## 9. OF THE AUTHORIZATION

### 9.1. *Authorization for data processing*

Those obliged to comply with this policy must obtain from the Owner their prior, express and informed authorization to collect and process their personal data. This obligation is not necessary in the case of data of a public nature.

To obtain the authorization, the following instructions must be followed:

First, before the person authorizes it is necessary to inform him clearly and expressly of the following:

- The treatment to which your personal data will be submitted and the purpose thereof.
- The optional nature of the answer to the questions that are asked when these deal with sensitive data or on the data of children and adolescents.
- The rights that assist you as Holder, provided for in article 8 of Law 1581 of 2012.
- The identification, physical or electronic address of **KEDRION COLOMBIA S.A.S.**

Secondly, it will obtain the consent of the Owner through any means that may be subject to subsequent consultation, such as website, forms, formats, activities, contests, face-to-face or social networks, PQRS, data messages or Apps.

Proof of compliance with the obligation to inform, as well as consent, must be provided.

The authorization may also be obtained from unequivocal conduct (s) of the Data Subject that allows (s) to conclude, in a reasonable manner, that he granted his consent for the processing of his information. Such conduct(s) must be very clear, so that it does not admit doubt or mistake about the will to authorize the treatment.

## **9.2. Authorization for processing sensitive data**

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

- The authorization must be explicit or through clear, specific, and verifiable unambiguous conduct.
- The Owner must be informed that he is not obliged to authorize the processing of such information.
- The Owner must be explicitly and previously informed which of the data that will be processed are sensitive and the purpose of such treatment.

With regard to the processing of sensitive data, in the case of **KEDRION COLOMBIA S.A.S.**, may be treated in accordance with the following scenarios:

- The Treatment has a historical, statistical, or scientific purpose. In this event, the measures leading to the suppression of the identity of the Holders must be adopted.<sup>14</sup>
- The information is required by a public or administrative entity in the exercise of its legal functions or by court order.<sup>15</sup>
- The information is provided to public or administrative entities in the exercise of their legal functions or by court order.<sup>16</sup>
- You can access information covered by legal reserve, including that related to personal data.<sup>17</sup>

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<sup>14</sup> Literal e) of article 6 of the Statutory Law 1581 of 2012.

<sup>15</sup> Literal a) of Article 10 of the Statutory Law 1581 of 2012.

<sup>16</sup> Literal b) of Article 13 of the Statutory Law 1581 of 2012.

<sup>17</sup> Article 267 of the Political Constitution, article 136 of Law 1955 of 2019, article 3, literal k) and article 90 of Decree 403 of 2020



### **9.3. Authorization of data processing of children and adolescents (NNA)**

When it comes to the collection and processing of data from children and adolescents, the following requirements must be met:

- Authorization must be granted by persons who are authorized to represent children. The representative of the children must guarantee them the right to be heard and to assess their opinion of the treatment considering the maturity, autonomy and capacity of the children to understand the matter.
- It should be reported that it is optional to answer questions about data from children.

## **10. SAFETY**

**KEDRION COLOMBIA S.A.S.** will adopt the corresponding technical, physical, legal, human, administrative and organizational measures, which are related to the laws of privacy and security of the data to avoid its adulteration, loss, consultation, use or unauthorized or fraudulent access. If the Holders, consider that their interaction with **KEDRION COLOMBIA S.A.S.** is no longer secure (for example, if they believe that the security of their personal information could be compromised), they must immediately notify **KEDRION COLOMBIA S.A.S.** through the service channels indicated in this Policy.

When **KEDRION COLOMBIA S.A.S.** Provide personal information to a service provider, the service provider will be carefully selected and must use appropriate measures to protect the confidentiality and security of the personal information.

## **11. RETENTION OF PERSONAL INFORMATION**

**KEDRION COLOMBIA S.A.S.** adopts reasonable measures to ensure that personal information is reliable for the intended, accurate and complete use, as necessary, to carry out the purposes described in this Personal Data Processing Policy. The organization will keep the personal information of the Holders for the period necessary to fulfill the purposes established in this policy unless a longer retention period is required or permitted by applicable law.

## **12. NATIONAL OR INTERNATIONAL TRANSFER OF PERSONAL DATA**

**KEDRION COLOMBIA S.A.S.** may transfer data to other Data Controllers when authorized by the Owner of the information, by law or by an administrative or judicial order, complying with all the requirements contemplated by the Law and the guidelines provided by the Superintendence of Industry and Commerce as an authority in the matter.

## **13. INTERNATIONAL AND NATIONAL TRANSMISSIONS OF DATA TO PROCESSORS**

**KEDRION COLOMBIA S.A.S.** may send or transmit data to one or more managers located inside or outside the territory of the Republic of Colombia in the following cases:

- ✓ When you have authorization from the Holder.
- ✓ When, without the authorization of the Owner, there is a contract or data transmission agreement between the Responsible and the Processor.

#### **14. PROCEDURES FOR HOLDERS TO EXERCISE THEIR RIGHTS**

Below are the procedures for Data Subjects to exercise their rights to know, update, rectify or delete information or revoke authorization.

The rights of the Holders may be exercised by the following persons, legitimated in accordance with article 2.2.2.25.4.1 of the Single Regulatory Decree 1074 of 2015.<sup>18</sup>

- By the Holder, who must prove his identity sufficiently by the different means made available to him by **KEDRION COLOMBIA S.A.S.**
- By their successors in title, who must prove such quality.
- By the representative or proxy of the Holder, after accreditation of the representation or power of attorney.
- By stipulation in favor of another or for another.

The rights of children or adolescents shall be exercised by the persons who are entitled to represent them.

All inquiries and claims to **KEDRION COLOMBIA S.A.S.** They can be done through the following mechanisms:

- ✓ Email [j.beltran@kedrion.com](mailto:j.beltran@kedrion.com)
- ✓ At the following physical address: Avenue Street 26 # 69D – 91 Tower 2 Office 509, Bogotá, Colombia.

These are the guidelines for dealing with queries and complaints:

##### **14.1. Consultations**

All queries made by persons entitled to know the personal data that rest in **KEDRION COLOMBIA S.A.S.** will be channeled **EXCLUSIVELY** through the channels that the organization has destined for this purpose. In any case, it is necessary to leave proof of the following:

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<sup>18</sup> Amended the provisions of the article 20 of Decree 1377 of 2013

- Date of receipt of the query.
- Identity of the applicant.
- Contact details and notification of the applicant.

Once the identity of the Owner has been verified, the required personal data will be provided. The response to the query must be communicated to the applicant within a maximum period of ten (10) business days from the date of receipt of the same. When it is not possible to attend the consultation within that term, the interested party will be informed, expressing the reasons for the delay and indicating the date on which their consultation will be attended, which in no case may exceed five (5) business days following the expiration of the first term.

## **14.2. Claims**

The claims are intended to correct, update, or delete data or raise a complaint for the alleged breach of any of the duties established for the data protection regime and in this policy.

In any case, the response process will be followed by the Personal Data Protection Officer of **KEDRION COLOMBIA S.A.S.**, who may be contacted directly when the response provided by the agency directly concerned with the matter is contrary to the interests of the petitioner.

The claim must be submitted by means of a request addressed to **KEDRION COLOMBIA S.A.S.** containing the following information:

- Name and identification of the Data Holder or the legitimated person.
- Accurate and complete description of the facts giving rise to the claim.
- Physical or electronic address to send the response and report on the status of the procedure.
- Documents and other relevant evidence that you wish to assert.

If the claim is incomplete, the interested party will be required within five (5) days of receipt of the claim to correct the failures, supplement or clarify their request. After two (2) months from the date of the request, without the applicant submitting the required information, it will be understood that he has withdrawn the claim.

If the claim is complete, a legend that says "*claim in process*" will be included in the database or information system, as well as the reason for it, within a term not exceeding two (2) business days. This must be maintained until the claim is decided.

The maximum term to attend the claim will be fifteen (15) business days counted from the day following the date of receipt. When it is not possible to attend the claim within that term, 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.

#### 15. PERSON OR AREA RESPONSIBLE FOR THE PROTECTION OF PERSONAL DATA

Country Manager is the person designated as Personal Data Protection Officer at **KEDRION COLOMBIA S.A.S.** and, therefore, the person in charge of ensuring the protection of the exercise of the right of habeas data by the holders of personal data, who can be contacted via email [j.beltran@kedrion.com](mailto:j.beltran@kedrion.com)

#### 16. VIDEO SURVEILLANCE

**KEDRION COLOMBIA S.A.S.** uses video surveillance systems installed in different sites, internal and external, of our facilities or offices, located at Avenue Street 26 # 69D – 91 Tower 2 Office 509, in Bogotá D. C., Colombia.

**KEDRION COLOMBIA S.A.S.** informs about the existence of these mechanisms through the dissemination, in visible places, of video surveillance announcements, mainly in the pedestrian and vehicular accesses of its facilities.

The information collected will be used for purposes of security of persons, property and facilities, compliance with legal provisions and compliance with contractual provisions. This information can be used as evidence in any type of process before any type of authority and organization.

#### 17. EFFECTIVE DATE OF THIS POLICY AND PERIOD OF VALIDITY OF THE DATABASE

This policy was approved after the issuance of Law 1581 of 2012 and Single Regulatory Decree 1074 of 2015, which is why it enters into force as of May 2021.<sup>19</sup>

The validity of the database will be the reasonable and necessary time to fulfill the purposes of the treatment, taking into account the provisions of article 2.2.2.25.2.8 of the Single Regulatory Decree 1074 of 2015.<sup>20</sup>

#### 18. DATA CONTROLLER

Company name: **KEDRION DE COLOMBIA S.A.S.**

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<sup>19</sup> Modified Decree 1377 of June 27, 2013

<sup>20</sup> It modified Article 11 of Decree 1377 of 2013.

Address: Avenue Street 26 # 69D – 91 Tower 2 Office 509, Bogotá, Colombia

Email: [j.beltran@kedrion.com](mailto:j.beltran@kedrion.com)

Phone: in Bogotá (57-1) 9262052

## 19. LAW AND JURISDICTION

This policy is governed by the provisions of Colombian law and any dispute related to its effects or derived from it, will be submitted to the ordinary justice of the Republic of Colombia.

## 20. ADJUSTMENTS TO THE PERSONAL DATA PROCESSING POLICY

To maintain the validity of this policy, **KEDRION COLOMBIA S.A.S.** You can adjust and modify it, indicating the date of the update by using means such as data messages or physical materials at the points of attention to the user.

Last updated: December 02, 2022