

## PRIVACY POLICY

### POLICY FOR THE MANAGEMENT OF PERSONAL DATA OF CUSTOMERS AND USERS. SIEMBRACLIX SAS - SITE SIEMBRACLIX.COM

In accordance with Article 15 of the Political Constitution of Colombia, all persons have the right to know, update and rectify the information that is held about them in the data centers. In **SIEMBRACLIX SAS**. As responsible for information, we have a special regulation on the Protection of the Data of our clients, and we define processes and policies that seek to guarantee trust, security and quality in the use of information. **SIEMBRACLIX SAS**. receive, register, preserve, modify, report, consult, deliver, share and delete information with the authorization of the holder thereof. The data allow us to offer and provide information on products and services to consult, report and update information and risk operators; update the status of contractual, comply with agreed, prevent the risk of money laundering, financing of terrorism, among others. **SIEMBRACLIX SAS**. obtains the authorization of the owner of the data through different means, such as written authorization, verbal or by different virtual media for the following purposes: **Purposes:**

know the commercial behavior of the client, and compliance with their legal obligations; carry out all the necessary procedures to confirm and update the client's information; validate and verify the identity of the client for the offering and administration of products and services, as well as to share the information; establish a contractual relationship, as well as maintain and terminate a contractual relationship; offer and provide products or services through a medium or channel according to the profile of the client; perform adequate provision and administration of commercial services, including collection management; Send commercial, legal, product, security or service information or any other information; know the location and contact details of the client for purposes of notifications for security purposes and offering of benefits and commercial offers; business analysis and research, statistics, market, commercial risks, including the client for these purposes; receive information from the Gruptecol SAS Group and Filiar regarding current and future commercial campaigns, promotion of products and services, and other communications necessary to maintain communication and aware of the customer through: telephone call, text message, email, Facebook, Twitter, Instagram or any social integration network, among others; receive messages related to the collection and recovery of the portfolio, either directly or through a third party hired for the function; conduct satisfaction surveys concerning the services provided by Grupo Gruptecol SAS and Filiar; consult purposes and sanctions to the different administrative and judicial authorities, or public databases that have the same function as the administration of data of this nature.

### **Applicable legislation on protection of personal data.**

- Article 15 of the Political Constitution of Colombia.
- Statutory Law 1266 of 2008. Law 1273 of 2009.
- Statutory Law 1581 of 2012. Decree 1377 of 2013.
- Decree 886 of 2014.

### **Guiding Principles of the Treatment of Personal Data.**

- Principle of legality in data processing: The treatment referred to in Law 1581 of 2012 is a regulated activity that must be subject to what is established in it and in the other provisions that develop it. Principle of purpose: it obeys a legitimate purpose in accordance with the Constitution and the Law, which must be informed to the owner.
- Principle of freedom: treatment can only be exercised with the prior, express and informed consent of the owner.
- Personal data may not be obtained or disclosed without prior authorization, or in the absence of legal or judicial mandate. Principle of truthfulness or quality: the information that is the object of treatment must be truthful, complete, updated, verifiable and understandable.
- It is forbidden the treatment of data, fractioned or misleading. Principle of transparency: the owner has the right to obtain at any time and without restrictions, information about the existence of data about him.
- Principle of access and restricted circulation: the treatment is subject to the limits derived from the nature of the personal data, the provisions of Law 1581 of 2012 and the Constitution. In this sense, the treatment can only be done by persons authorized by the owner and / or by the persons provided by law. Personal data, except public information, may not be available on the Internet or other means of dissemination or mass communication, unless access is technically controllable to provide restricted knowledge only to holders or authorized third parties pursuant to law 1581 of 2012.
- Principle of security: the information subject to the treatment referred to in this law shall be handled with the technical, human and administrative measures necessary to grant security to the records, avoiding their adulteration, loss, consultation, use or unauthorized access or fraudulent.
- Principle of confidentiality: all persons involved in the processing of personal data that do not have the nature of public are obliged to guarantee the reservation of information, even after the end of their relationship with any of the tasks involved in the treatment, being able to only make provision or communication of personal data when this corresponds to the development of the activities authorized by Law 1581 of 2012 and in the terms thereof.
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## Definitions

- Authorization: is the prior, express and informed consent of the owner of the information to carry out the processing of personal data.
- Database: organized set of personal data object of treatment.
- Personal Data: any information linked to or associated with one or several natural persons determined or determinable.
- Public Data: data that the law or the Constitution determines as such, as well as those that are not semi-private or private.
- Private Data: is that data that by its intimate or reserved nature is only relevant for the owner of the information.
- Semiprivate Data: is that data that has not private, reserved, or public nature and whose knowledge or disclosure may be of interest not only to its owner but to certain sector or group of people.
- Sensitive Data: is the data that affects the privacy of the owner or whose improper use can generate discrimination.
- Responsible for the Treatment: natural or legal person, public or private, that by itself or in association with others, perform the processing of personal data on behalf of the controller.
- Responsible for the Treatment: natural or legal person, public or private, that by itself or in association with others, perform the processing of personal data on behalf of the controller.
- Owner: natural person whose personal data are subject to treatment.
- Data transfer: takes place when the person in charge and / or in charge of the processing of personal data, located in Colombia, sends the information or personal data to a receiver, who in turn is responsible for the treatment and is inside or outside the country
- Transmission of Data: treatment of personal data that implies the communication of the same within or outside the territory of the Republic of Colombia when it is intended to carry out a treatment by the person in charge on behalf of the person in charge.
- Treatment: any operation or set of operations on personal data, such as collection, storage, use, circulation or deletion.

To guarantee the protection of the Habeas Data right, as the owner of the information, our clients can:

- Know, update and rectify your personal data.
- Find out about the treatment that SIEMBRACLIX SAS performs on your personal data.
- Submit requests and complaints related to the current regulation on the protection of personal data.

- Request the revocation of the authorization and / or elimination of personal data in the case of determining that SIEMBRACLIX SAS. present a behavior contrary to the current regulation.
- The request for cancellation or revocation does not apply if they have the legal or contractual duty to be in the database of SIEMBRACLIX SAS.
- To exercise your rights to know, update, rectify and / or eliminate, you can contact us through Email: Info@Siembraclix.com, with the subject "Update data".
- To make a claim about the handling of your personal data, you can also contact the Email: Info@Siembraclix.com, and send your request under the terms established by law or to the addresses found on our portal [www.Siembraclix.com](http://www.Siembraclix.com)

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