

**PERSONAL DATA
PRIVACY POLICY**

Pol 002

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1. SCOPE

This Personal Data Protection Policy will be applied to all databases and/or files containing personal data which are processed by PLASTILENE GROUP, considered as responsible and/or in charge of the processing of personal data, (hereafter referred to as THE COMPANY).

2. RESPONSABLE

Identification of the responsible party for the processing of personal data: GRUPO PLASTILENE with main domicile of the company located at Carrera 4 58 – 66, municipality of Soacha - Cundinamarca, Colombia. E-mail: sistemas@plastilene.net, telephone: 7305900.

3. DEFINITIONS

- Authorization: Prior, express and informed consent by the Data Subject to carry out the Processing of Personal Data.
- Privacy Notice: Verbal or written communication generated by the Controller, addressed to the Data Subject for the Processing of his/her Personal Data, by means of which he/she is informed of the existence of the Information Processing Policies that will be applied, the way to access them, and the purposes of the processing intended for the personal data.
- Data Base: Organized group of Personal Data that is the object of Processing.
- Personal Data: Any information that can be associated with one or more determined or determinable natural persons.
- Data Controller: Natural or legal person, public or private, who by himself/herself or in association with others, carries out the Processing of Personal Data on behalf of the Data Controller. In the event in which the Data Controller does not act as Data Processor, the Data Processor will be expressly identified.
- Data Responsible person: Natural or legal person, public or private, that by himself or in association with others, decides about the Data Base and/or the Data Processing.
- Terms and Conditions: general framework in which the conditions for the participants of promotional or related activities are established.
- Holder: natural person whose Personal Data are subject to Processing.
- Processing: Any operation or set of operations on Personal Data, such as collection, storage, use, circulation or deletion.
- Transfer: The transfer of data takes place when the Responsible and/or Person in charge of the Processing of Personal Data, located in Colombia, sends information or personal data to a recipient, who in turn is Responsible for Processing and is located in or outside the country.



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- Transmission: Treatment of Personal Data that implies the communication of the same within or outside the territory of the Republic of Colombia when it has as its object the carrying out of a Treatment by the Responsible for the Responsible.

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4. DEVELOPMENT

5.1. PROCESSING

THE COMPANY, acting in its capacity as Responsible for the Processing of Personal Data for the appropriate development of its commercial activities, as well as for the strengthening of its relations with third parties, collects, stores, uses, circulates and deletes Personal Data corresponding to natural persons with whom it has or has had a relationship, such as, without the list implying limitation, workers and their families, shareholders, consumers, customers, distributors, suppliers, creditors and debtors.

5.2. PURPOSE

Personal Data are processed by the COMPANY for the following purposes:

- ✓ For Operational and Registration Activities.
- ✓ To attend or formalize any type of procedure, product, or service that is requested or required.
- ✓ To send information to your employees and family members;
- ✓ To strengthen relations with your consumers and clients, by sending relevant information.
- ✓ To carry out surveys, statistics, invitations or calls by the firms that make up PLASTILENE GROUP.
- ✓ To offer and/or inform you about products and/or services of the companies of the Corporate Group.
- ✓ To fulfill the functions established in the Code of Commerce and in the other regulations that complement its operational legal framework.
- ✓ To verify your creditors' balances.
- ✓ For the determination of pending liabilities, the consultation of financial information and credit history, and the report to information centers of unfulfilled obligations, with respect to their debtors.
- ✓ To eventually contact, via e-mail, or by any other means, individuals with whom it has or has had a relationship, such as, but not limited to, employees and their families, shareholders, consumers, customers, distributors, suppliers, creditors and debtors, for the purposes mentioned above.

5.3. RIGHTS OF THE HOLDERS OF PERSONAL DATA

The individuals whose Personal Data are processed by THE COMPANY have the following rights, which they may exercise at any time:

- To know the Personal Data about which THE COMPANY is carrying out the

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processing. Similarly, the owner may request at any time that their data are updated or rectified, for example, if he/she finds that their data are partial, inaccurate, incomplete, divided, misleading, or whose treatment is expressly prohibited or has not been authorized.

- To request proof of authorization for the collection and processing of your personal data.
- To be informed by those responsible of the use given to your personal data.
- To file complaints with the Superintendence of Industry and Commerce in the event of a violation by those responsible of the provisions of Law 1581 of 2012, Decree 1377 of 2013 and other regulations that modify, repeal or replace them.
- To revoke the authorization granted for the processing of personal data.
- To request to be removed from the database as long as there is no legal or contractual duty to remain in the database and to have access to your Personal Data that the person in charge has collected and processed by means of communication addressed to the Data Protection Officer at sistemas@plastilene.net

6. DEPARTMENT RESPONSIBLE FOR THE IMPLEMENTATION AND OBSERVATION OF THIS POLICY

PLASTILENE GROUP's Financial and Systems area has the responsibility of developing, implementing, training, and observing this policy. To this effect and to immediately process all requests, complaints, or claims received from the owners of personal data.

7. CONSENT

THE COMPANY must request previous, express, and informed authorization to the owners of the Personal Data about which it requires to carry out the treatment, by means of the document "Privacy Notice and Express Authorization for the Processing of Personal Data" as Annex 1 of this policy.

- 7.1.** Prior consent means that the consent must be granted by the Data Subject, at the latest at the time of collection of the Personal Data.
- 7.2.** Express consent means that the consent of the Data Subject must be explicit and concrete, as open and non-specific authorizations are not valid. It is required that the Data Subject expresses his/her willingness to authorize the COMPANY to carry out the processing of his/her Personal Data.
- 7.3.** This manifestation of the desire of the holder can be granted through the written authorization form.
- 7.4.** Informed consent means that at the moment of requesting the consent from the Data Subject, he/she must be clearly informed about:
 - The Personal Data that will be collected.

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- The identification and contact details of the Data Controller and Data Processor.
- The specific purposes of the processing to be carried out, that is: how and for what purpose the collection, use, and circulation of the Personal Data will be made.
- What the rights are as Holder of the Personal Data.

8. SPECIAL PROVISIONS FOR THE PROCESSING OF PERSONAL DATA THAT ARE SENSITIVE IN NATURE

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8.1. In accordance with the Law on the Protection of Personal Data, data of a sensitive nature are considered those that affect privacy or whose improper use may generate discrimination, such as those related to:

- Racial or ethnic origin.
- Political orientation.
- Religious/philosophical convictions.
- Membership of trade unions, social organizations, human rights organizations or political parties.
- Health.
- Sexual orientation.
- Biometric data (such as fingerprint, signature and photo).

The Processing of Personal Data of a sensitive nature is prohibited by law, unless the Data Subject has given his/her express, prior and informed authorization, among other exceptions enshrined in Article 6 of Law 1581 of 2012.

In this case, in addition to complying with the requirements established for authorization, THE COMPANY must:

- Inform the Data Subject that since it is sensitive data, it is not obliged to authorize its processing.
- Inform the owner about which of the data to be processed are sensitive and the purpose of the processing.

IMPORTANT: No activity may be conditioned to the provision of sensitive Personal Data by the Data Subject.

9. PROCEDURE FOR ATTENTION AND RESPONSE TO REQUESTS, CONSULTATIONS, COMPLAINTS AND CLAIMS FROM THE HOLDERS OF PERSONAL DATA

The Owners of the Personal Data being collected, stored, used, and put into circulation by THE COMPANY, may at any time exercise their rights to know, update, rectify and delete information and revoke the authorization.

For this purpose, the following procedure shall be followed, in accordance with the Personal Data Protection Law:

9.1. ATTENTION AND RESPONSE TO REQUESTS, CONSULTATIONS, COMPLAINTS AND CLAIMS:

The owner or his assignees may request from the COMPANY, through a request, consultation, complaint, or claim submitted through the indicated channels:

- Information on the Personal Data of the Holder that are subject to processing.

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- Proof of authorization granted to THE COMPANY for the processing of their Personal Data.
- Information regarding the use given by THE COMPANY to your personal data.
- The correction or updating of the information.
- The deletion of your Personal Data or the revocation of the authorization granted for the treatment of the same.
- The rectification or correction of the alleged breach of any of the duties contained in the Law on Protection of Personal Data.
- The request must contain a description of the facts that give rise to the complaint or claim, the address and contact details of the applicant, and be accompanied by the documents that you wish to assert.

Means enabled for the presentation of petitions and consultations:

THE COMPANY has made available the following means for the reception and attention of petitions and consultations, all of which allow evidence of the same to be kept:

Request presented to the e-mail address: sistemas@plastilene.net Attention and answer from THE COMPANY:

The requests, consultations, complaints and claims will be attended in a maximum term of ten (10) working days from the date of receipt of the same. When it is not possible to attend to the request or consultation within said term, the interested party will be informed, expressing the reasons for the delay and indicating the date on which their request or consultation will be attended to, which in no case may exceed five (5) working days following the expiry of the first term.

10. DATA OBTAINED IN PASSIVE FORM

By accessing or using the services contained within the web sites of THE COMPANY, THE COMPANY may passively collect information through information handling technologies, such as "cookies", through which information about computer hardware and software, IP address, browser type, operating system, domain name, access time and referring Web site addresses are collected; no Personal Data of users is collected directly through the use of these tools. Information will also be collected about the pages you most frequently visit on these websites in order to learn about your browsing habits. However, the user of the websites of THE COMPANY has the possibility to configure the functioning of the "cookies", according to the options of his internet browser.

11. SAFETY OF PERSONAL DATA



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THE COMPANY, in strict application of the Principle of Security in the Treatment of Personal Data, will provide the technical, human, and administrative measures that are necessary to give security to the records avoiding their adulteration, loss, consultation, unauthorized or fraudulent use or access. The obligation and responsibility of THE COMPANY is limited to having the appropriate means for this purpose. THE COMPANY does not guarantee the total security of its information nor is it responsible for any consequences arising from technical failures or improper entry by third parties into the database or file where the Personal Data being processed by THE COMPANY and its managers are stored. THE COMPANY will require the service providers it contracts to adopt and comply with the appropriate technical, human, and administrative measures for the protection of the Personal Data in relation to which these providers act as Agents.



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12. APPLICABLE LEGISLATION

This Personal Data Protection Policy, the Privacy Notice and the Authorization Form that is part of this Policy as Annex 1, are governed by the provisions of existing legislation on the protection of personal data referred to in Article 15 of the Political Constitution of Colombia, Law 1266 of 2008, Decree 1727 of 2009, Law 1581 of 2012, Decree 1377 of 2013, the other circulars and rules that modify, repeal or replace them.