



**PERSONAL DATA PROCESSING
POLICY**

**CODE: L9 VERSION: 3
ISSUE DATE: 10-10-2016**



I N M O V
Global Network

**INMOV S.A.S. NIT.
802.013.501-4
Carrera 7 No. 156-78 Torre 2 Piso 17 North Point
PBX (571) 7455152
Bogotá D.C. protecciondedatos@inmov.com**



PERSONAL DATA PROCESSING POLICY

CODE: L9 VERSION: 3
ISSUE DATE: 10-10-2016

CONTENT

INTRODUCTION.....	4
I. DEFINITIONS.....	5
II. AIM.....	8
III. SCOPE OF APPLICATION.....	9
IV. RECIPIENTS OF THIS POLICY.....	9
V. APPLICABLE REQUIREMENTS FOR DATA PROCESSING PERSONAL.....	9
VI. RIGHTS OF DATA SUBJECTS.....	12
VII. DUTIES OF THE RECIPIENTS OF THIS POLICY WITH RESPECT TO PERSONAL DATABASES WHEN THEY HOLD QUALITY OF MANAGERS AND IN CHARGE.....	14
VIII. HABEAS DATA PROCEDURE FOR THE EXERCISE OF THE RIGHTS TO INFORMATION, ACCESS, UPDATING, RECTIFICATION, CANCELLATION AND OPPOSITION.....	17
IX. CENTRAL REGISTRY OF PERSONAL DATABASES.....	19
X. PROCESSING OF PERSONAL DATA.....	20
XI. PLATFORM USERS.....	28
XII. PROHIBITIONS.....	29
XIII. INTERNATIONAL DATA TRANSFER.....	30
XIV. ROLES AND RESPONSIBILITIES IN COMPLIANCE WITH THE PERSONAL DATA PROTECTION.....	30
XV. TEMPORARY NATURE OF PERSONAL DATA.....	31
XVI. SECURITY MEASURES.....	31
XVII. PROCEDURES AND SANCTIONS.....	31
XVIII. DELIVERY OF PERSONAL DATA TO AUTHORITIES.....	32



PERSONAL DATA PROCESSING POLICY

CODE: L9 VERSION: 3
ISSUE DATE: 10-10-2016

XIX. INFORMATION SECURITY INCIDENT MANAGEMENT PERSONAL	33
XX. CONSIDERATIONS FOR AUDITS OF SYSTEMS INFORMATION	34
XXI. ACQUISITION, DEVELOPMENT AND MAINTENANCE OF SYSTEMS PERSONAL INFORMATION	35
XXII. VALIDITY	37
XXIII. CHANGE REFERENCE	38

CONFIDENCIAL



PERSONAL DATA PROCESSING POLICY

CODE: L9 VERSION: 3
ISSUE DATE: 10-10-2016

INTRODUCTION

INMOV S.A.S. identifies information as an indispensable component in the management and achievement of the objectives defined by the company's strategy, which is why it is necessary for INMOV S.A.S. to establish a framework in which it is ensured that information is adequately protected regardless of how it is handled, processed, transported and/or stored.

This policy describes the information security requirements and standards defined by INMOV S.A.S. Its development is based on applicable laws and regulations, Chapter Twelve of Title One of the Basic Legal Circular of the Financial Superintendency of Colombia, the ISO 27001:2013 standard, and the recommendations of the ISO 27002:2013 standard.

The requirements and standards of this policy constitute a fundamental part of INMOV's information security management system SAS and become the basis for the implementation of the defined controls, procedures and standards.

Information security is a priority for the company and therefore it is everyone's responsibility to ensure that no activities are carried out that contradict the essence and spirit of each of these policies.



PERSONAL DATA PROCESSING POLICY

CODE: L9 VERSION: 3
ISSUE DATE: 10-10-2016

I. DEFINITIONS

Personal database It is any organized set of personal data, regardless of the form or method of its creation, storage, organization and access.

Automated database It is the organized set of personal data that are created, processed and/or stored through computer programs or software, which are managed by the Digital Development and ICT leader.

Non-automated database It is the organized set of personal data that is created, processed and/or stored manually, without the use of computer programs or software.

Data transfer Data processing that involves its disclosure to a person other than the data subject or other than the person authorized as the recipient.

Custodian of the database. This is the individual who has custody of the personal data database within Inmov S.A.S.

Personal data It is any data and/or information that identifies a natural person or makes them identifiable. This can include numerical, alphabetical, graphic, visual, biometric, auditory, profile, or any other type of data.

Sensitive personal data It is a special category of personal data that is especially protected, as it concerns health, sex, political affiliation, race or ethnic origin, among others, which are part of the intimate affairs of the person and can only be collected with the express and informed consent of its owner and in the cases provided for by law.

Public Data. Data that is not semi-private, private, or sensitive is considered public data. This includes, among other things, data relating to a person's marital status, profession or occupation, and their status as a merchant or public servant.

Person in charge of treatment It is the natural or legal person, public or private authority, who, alone or in association with others, carries out the processing of personal data on behalf of the controller.

Publicly accessible sources This refers to databases containing personal data that can be consulted by anyone, which may or may not involve payment in exchange for access to such data. Telephone directories, industry or sector directories, among others, fall under this category of publicly accessible sources, provided that...



PERSONAL DATA PROCESSING POLICY

CODE: L9 VERSION: 3
ISSUE DATE: 10-10-2016

This applies when the information is limited to general personal data or contains general legal provisions. This condition will apply to printed media, the official gazette, and other media outlets.

You have data. Fundamental right of every person to know, update, rectify and/or cancel the personal information and data that has been collected and/or processed in public or private databases, in accordance with the law and other applicable regulations.

Procedure for analyzing and creating information It is the creation of information about a person, based on the analysis and processing of personal data collected and authorized, for the purpose of analyzing and extracting profiles or behavioral habits, which generate added value on the information obtained from the owner of each piece of personal data.

Dissociation procedure It refers to all processing of personal data in such a way that the information obtained cannot be associated with an identified or identifiable person.

Principles for data processing These are the fundamental rules, of legal and/or jurisprudential order, that inspire and guide the processing of personal data, from which actions and criteria are determined to resolve the possible conflict between the right to privacy, habeas data and protection of personal data, and the right to information.

Database owner Within the business processes of INMOV S.A.S., the database is owned by the area responsible for its processing and management (Table No. 1).

Data Controller It is the natural or legal person, of a public or private nature, who collects personal data and decides on the purpose, content and use of the database for its processing.

Owner of the personal data This refers to the natural person whose data is being processed. With respect to legal entities, the name is considered a fundamental right protected by the Constitution.

Data Processing Any operation or set of operations and technical procedures, whether automated or not, performed on personal data, such as collection, recording, storage, preservation, use, circulation, modification, blocking, cancellation, among others.

Data Transfer. Data transfer occurs when the Controller and/or Processor of personal data, located in Colombia, sends the information or personal data to a recipient, who in turn



PERSONAL DATA PROCESSING POLICY

CODE: L9 VERSION: 3
ISSUE DATE: 10-10-2016

is the Data Controller and is located inside or outside the country.

User It is the natural or legal person who has an interest in the use of personal information.

Violation of personal data This is the crime established by Law 1273 of 2009, contained in Article 269 F of the Colombian Penal Code. The prohibited conduct is as follows: "Anyone who, without authorization, for their own benefit or that of a third party, obtains, compiles, steals, offers, sells, exchanges, sends, buys, intercepts, discloses, modifies, or uses personal codes, personal data contained in databases, files, or similar means, shall be subject to imprisonment for forty-eight (48) to ninety-six (96) years."

(96) Months and a fine of 100 to 1000 current legal monthly minimum wages."

Violations of personal data security measures. A security incident will be considered any situation that involves a breach of the security measures adopted by INMOV S.A.S. to protect the personal data entrusted to its safekeeping, whether as Data Controller and/or Data Processor, as well as any other conduct that constitutes improper processing of personal data contrary to the provisions herein or to the Law. Any security incident that compromises personal data held by INMOV

SAS must be informed to the relevant supervisory authority.

CONFIDENTIAL



PERSONAL DATA PROCESSING POLICY

CODE: L9 VERSION: 3
ISSUE DATE: 10-10-2016

II. AIM

INMOV S.A.S aims to adopt and establish the rules applicable to the processing of personal data collected, processed, used, handled, transferred, deleted and/or stored, of natural persons with whom it has or has had some type of relationship through different means such as physical or virtual means, hereinafter the "Personal Information", in development of its corporate purpose, whether as the controller and/or processor.

The rules contained in this policy comply with the provisions of Law 1581 of 2012, Law 1266 of 2008, Regulatory Decrees 1727 of 2009 and 2952 of 2010, and Article 15 of the Political Constitution of Colombia, regarding the guarantee of the privacy of persons, exercise of habeas data and protection of personal data, in accordance with the right to information, so that these rights are regulated proportionally in INMOV S.A.S., and the violation of them can be prevented.

The rules adopted in this policy by INMOV S.A.S comply with international standards regarding the protection of personal data.



PERSONAL DATA PROCESSING POLICY

CODE: L9 VERSION: 3
ISSUE DATE: 10-10-2016

III. SCOPE OF APPLICATION

This policy will apply to the processing of personal data carried out in Colombian territory, or when the rule is applicable to the controller and/or processor located outside of Colombian territory, by virtue of international treaties, contractual relationships, among others.

The principles and provisions contained in this personal information security policy will apply to any personal data database held in the custody of INMOV S.A.S., whether as the data controller and/or as the data processor.

All organizational processes of the company that involve the processing of personal data must comply with the provisions of this policy.

IV. RECIPIENTS OF THIS POLICY.

This policy will apply to and therefore be binding on the following persons:

- ✓ Legal Representative and/or partners.
- ✓ Internal personnel of INMOV S.A.S., whether managers or not, who safeguard and process personal data databases.
- ✓ Contractors and natural or legal persons who provide their services to INMOV S.A.S. under any type of contractual arrangement, by virtue of which any processing of personal data is carried out.
- ✓ Shareholders, auditors and other persons with whom there is a statutory legal relationship.
- ✓ Public and private persons in the capacity of users of personal data.
- ✓ Other persons as established by law.

V. REQUIREMENTS APPLICABLE TO THE PROCESSING OF PERSONAL DATA

The protection of personal data at INMOV S.A.S. will be subject to the requirements of the fundamental policy or rules, based on which the internal processes related to the processing of personal data will be determined and will be interpreted in a harmonious, comprehensive and systematic way to resolve the conflicts that arise in this matter, policies enshrined in international standards, in Colombian laws and in the jurisprudence of the Constitutional Court that has developed the fundamental rights linked to personal data.



PERSONAL DATA PROCESSING POLICY

CODE: L9 VERSION: 3
ISSUE DATE: 10-10-2016

Informed consent or the principle of freedom.

The processing of personal data within INMOV S.A.S. may only be carried out with the prior, express, and informed consent of the data subject. Personal data may not be obtained, processed, or disclosed without the data subject's authorization, except in cases of legal or judicial mandate that supersedes the data subject's consent.

Legality.

The processing of personal data in Colombia is a regulated activity and therefore the business processes and recipients of this regulation must comply with the provisions of this regulation.

Purpose of the Data.

The processing of personal data must be for a legitimate purpose, in accordance with the Constitution and the law, which must be clearly, precisely and in advance communicated to the data subject so that they can give their informed consent (purpose and legal requirement: table No. 1).

Quality or veracity of the data.

The personal data collected by INMOV S.A.S. must be truthful, complete, accurate, verifiable, understandable, and kept up to date. The processing of partial, fragmented, incomplete, or misleading data is prohibited.

Transparency.

In the processing of personal data, the right of the data subject to obtain and know from the controller and/or processor, at any time and without restrictions, information about the existence of data concerning him or her will be guaranteed.

Relevance of the data.

When collecting personal data, INMOV S.A.S. must consider the purpose of the processing and/or the database; therefore, the data must be adequate, relevant, and not excessive or disproportionate in relation to that purpose. The collection of personal data that is disproportionate to the purpose for which it is obtained is prohibited.

Restricted Access and Circulation.

The personal data collected or processed by INMOV S.A.S. will be used by this company only within the scope of the purpose and authorization granted by the



PERSONAL DATA PROCESSING POLICY

CODE: L9 VERSION: 3
ISSUE DATE: 10-10-2016

data subject.



PERSONAL DATA PROCESSING POLICY

CODE: L9 VERSION: 3
ISSUE DATE: 10-10-2016

Therefore, personal data may not be accessed, transferred, assigned or communicated to third parties, without prior authorization from the owner of the database for controlled purposes.

Personal data held by INMOV S.A.S. may not be available on the Internet or any other means of mass dissemination, unless access is technically controllable, secure and consented to by the owner of the database, and to provide restricted knowledge only to the owners or authorized third parties in accordance with the provisions of the law and the principles that govern the matter.

Data temporality.

Once the purpose for which the personal data was collected and/or processed has been fulfilled, INMOV S.A.S. must cease its use and therefore will adopt the appropriate security measures for this purpose.

For this purpose, the obligations of commercial law regarding the preservation of commercial books and correspondence of the defined merchant and that defined by INMOV S.A.S. will be taken into account. Law 594 of 2000

Table No. 1

STANDARD FOR RETENTION TIMES OF SENSITIVE INFORMATION INMOV S.A.S.														
ITEMS	DATABASE NAME	RESPONSIBLE PROCESS	MEDIUM			RETENTION TIME (Years)		ACCESS LEVEL			FINAL PROVISION			LEGAL REQUIREMENT
			Physical	Electronic	Other	management file	General Archive	Reserved	Confidential	Public	Conservation	Elimination	Organization	
1	PAYROLL MANAGEMENT	PAYROLL PROCESS			X	3	7		X			X	X	Law 1266 of 2008 (Habeas Data)
2	WORK HISTORIES (Contracts, certifications, performance evaluations, resumes, identity documents, licenses, resignations, degrees)	HUMAN TALENT PROCESS			X	3	20		X			X	X	Law 1266 of 2008 (Habeas Data) Decree 1072 of 2015
3	EMPLOYMENT MANAGEMENT (Personal Resumes Not Yet Hired)	HUMAN TALENT PROCESS	X		X	0.25	0				X	X		Law 1581 of 2012
4	PROMOTION AND SELECTION OF PERSONNEL	HUMAN TALENT PROCESS	X	X		3	5				X	X		Law 1581 of 2012
5	EMPLOYMENT MANAGEMENT (Personal resumes of Hired Employees)	HUMAN TALENT PROCESS	X	X		3	5		X			X		Law 1581 of 2012
6	OCCUPATIONAL RISK PREVENTION	SG-SST PROCESS	X	X		3	20		X			X		Law 1581 of 2012
7	SUPPORT FOR OCCUPATIONAL MEDICAL EXAMINATIONS	HUMAN TALENT PROCESS SG-SST PROCESS	X		X	3	20	X				X		Decree 1072 of 2015, Article 2.2.4.6.13
8	SOCIAL SECURITY	PAYROLL PROCESS			X	3	5	X				X	X	Law 1581 of 2012
9	WORK MANAGEMENT BY PROJECT OR TASK	HUMAN TALENT PROCESS		X		3	5		X			X	X	Law 1581 of 2012
10	WELL-BEING MANAGEMENT (prevention and promotion, AT, EL, Psychosocial Battery)	HUMAN TALENT PROCESS SG-SST PROCESS		X		3	20	X				X		Decree 1072 of 2015, Article 2.2.4.6.13
11	TRADE-SUPERNEIGHBOR OPERATIONS MANAGEMENT	BUSINESS PROCESS			X	3	3		X				X	Law 1581 of 2012
12	TRADE-DAVIPLATA OPERATIONS MANAGEMENT	BUSINESS PROCESS			X	3	3		X				X	Law 1581 of 2012
13	GOVERNMENT OPERATIONS MANAGEMENT	BUSINESS PROCESS			X	1	1		X			X	X	Law 1581 of 2012



PERSONAL DATA PROCESSING POLICY

CODE: L9 VERSION: 3
ISSUE DATE: 10-10-2016

Data Security.

INMOV S.A.S., as the data controller or processor, as applicable, will adopt the necessary physical, technological, and/or administrative security measures to guarantee the integrity, authenticity, and reliability of personal data. According to the classification of personal data, INMOV S.A.S. will implement high, medium, or low level security measures, as applicable, to prevent alteration, loss, leakage, unauthorized or fraudulent access, use, or disclosure. (Table No. 1)

Confidentiality.

INMOV S.A.S. and all persons involved in the processing of personal data have a professional obligation to safeguard and maintain the confidentiality of such data, an obligation that remains in effect even after the termination of the contractual relationship.

S.A.S. will implement data protection clauses in this regard in its contractual relationships.

Duty to Inform.

INMOV S.A.S. will inform data subjects, as well as data controllers and processors, about the data protection regime adopted by the organization, as well as the purpose and other principles governing the processing of this data. It will also inform them about the existence of the personal data databases it maintains, their rights, and how to exercise their habeas data rights, proceeding with the registration required by law.

Special protection of sensitive data.

INMOV S.A.S. will not collect or process personal data related exclusively to political ideologies, union affiliation, religious beliefs, sexual life, ethnic origin, or health data, except with the express authorization of the data subject and in those cases where consent is not required by law. Sensitive personal information obtained during a personnel selection process will be protected through robust security measures.

VI. RIGHTS OF DATA SUBJECTS

The owners of personal data contained in databases held in the information systems of INMOV S.A.S., have the rights described in this section in compliance with the fundamental guarantees enshrined in the Political Constitution and Law 1581 of 2012.

The exercise of these rights will be free and unlimited for the data subject.



PERSONAL DATA PROCESSING POLICY

CODE: L9 VERSION: 3
ISSUE DATE: 10-10-2016

personal, without prejudice to legal provisions that regulate their exercise. The exercise of Habeas Data, expressed in the following rights, constitutes a highly personal power and will be exercised exclusively by the data subject, except for the exceptions provided by law.

Right of Access.

This right includes the power of the data subject to obtain all information regarding their own personal data, whether partial or complete, the processing applied to them, the purpose of the processing, the location of the databases that contain their personal data, and the communications and/or transfers made regarding them, whether authorized or not.

Right to Update.

This right includes the power of the data subject to update their personal data when it has changed.

Right of Rectification.

This right includes the power of the data subject to modify data that is inaccurate, incomplete or non-existent.

Right of Cancellation.

This right includes the power of the data subject to cancel or delete their personal data when it is excessive, irrelevant, or the processing is contrary to the rules, except in those cases contemplated as exceptions by law.

Right to Withdraw Consent.

The owner of the personal data has the right to revoke the consent or authorization that enabled INMOV S.A.S. for processing for a specific purpose, except in those cases contemplated as exceptions by law and/or that are necessary in a specific contractual framework.

Right of Opposition.

This right includes the power of the data subject to object to the processing of their personal data, except in cases where such right is not applicable by legal provision or because it violates general interests superior to the particular interest.



PERSONAL DATA PROCESSING POLICY

CODE: L9 VERSION: 3
ISSUE DATE: 10-10-2016

The presidency, together with the legal advisor of INMOV S.A.S., based on the legitimate rights argued by the owner of the personal data, will make a proportionality or balancing judgment in order to determine the preeminence or not of the particular right of the data owner over other rights, for example, the right to information.

Right to file complaints and claims or to take legal action.

The data subject has the right to file complaints and claims with the Superintendency of Industry and Commerce, or the competent authority, as well as to take any other appropriate legal action for the protection of their data. INMOV S.A.S. will respond to requests from the competent authorities regarding these rights of data subjects.

Right to grant authorization for the processing of data.

In accordance with the principle of Informed Consent, the data subject has the right to grant their authorization, by any means that can be subsequently verified, to process their personal data at INMOV S.A.S.

Exceptionally, this authorization will not be required in the following cases:

- ✓ When required by a public or administrative entity in compliance with its legal functions, or by court order.
- ✓ When dealing with data of a public nature.
- ✓ In cases of medical or health emergencies.
- ✓ When it is processing of information authorized by law for historical, statistical or scientific purposes.
- ✓ When it comes to personal data related to the Civil Registry of persons.
- ✓ In these cases, although the authorization of the data subject is not required, the other principles and legal provisions on the protection of personal data will apply.

VII. DUTIES OF THE RECIPIENTS OF THIS POLICY WITH RESPECT TO PERSONAL DATABASES WHEN THEY HOLD THE POSITION OF CONTROLLERS AND PROCESSORS

Duties for the CONTROLLERS of the Processing.

When INMOV S.A.S. or any of the recipients of this policy assume the role of data controllers for personal data under their custody, they must comply with the



PERSONAL DATA PROCESSING POLICY

**CODE: L9 VERSION: 3
ISSUE DATE: 10-10-2016**

following duties, without prejudice to other provisions



PERSONAL DATA PROCESSING POLICY

CODE: L9 VERSION: 3
ISSUE DATE: 10-10-2016

provided for in the law and in other regulations governing their activity:

- a) To guarantee the Holder, at all times, the full and effective exercise of the right of habeas data.
- b) Request and retain, under the conditions provided in this policy, a copy of the respective authorization and consent granted by the Holder.
- c) Inform the Data Subject properly about the purpose of the collection and the rights they have by virtue of the authorization granted.
- d) Keep the information under the necessary security conditions to prevent its alteration, loss, consultation, use or unauthorized or fraudulent access.
- e) Ensure that the information provided to the Data Processor is truthful, complete, accurate, up-to-date, verifiable and understandable.
- f) Update the information, promptly informing the Data Controller of any changes to the data previously provided and take all other necessary measures to ensure that the information provided to the Data Controller remains up to date.
- g) Correct the information when it is incorrect and communicate the relevant information to the Data Controller.
- h) Provide the Data Processor, as applicable, only with data whose processing has been previously authorized in accordance with the provisions of the law.
- i) Require the Data Processor at all times to respect the security and privacy conditions of the Data Subject's information.
- j) Process inquiries and complaints made in accordance with the terms set out in this regulation and in the law.
- k) Adopt an internal manual of policies and procedures to ensure proper compliance with the law and, in particular, to address inquiries and complaints.
- l) Inform the Data Controller that certain information is under discussion by the data subject, once the complaint has been filed and the respective process has not yet been completed.
- m) Inform the data subject, upon request, about the use given to their data.
- n) Inform the data protection authority when security code violations occur and there are risks in the management of data subjects' information.
- o) Comply with the instructions and requirements issued by the Superintendency of Industry and Commerce.

Duties of those in charge of processing personal data.

When INMOV S.A.S. or any of the recipients of this policy assume the role of data processors for personal data under their custody, they must comply with the following duties, without prejudice to other provisions established by law and other regulations governing their activity:



PERSONAL DATA PROCESSING POLICY

CODE: L9 VERSION: 3
ISSUE DATE: 10-10-2016

- a) To guarantee the holder, at all times, the full and effective exercise of the right of habeas data.
- b) Keep the information under the necessary security conditions to prevent its alteration, loss, consultation, use or unauthorized or fraudulent access.
- c) To promptly update, rectify or delete data in accordance with the law.
- d) Update the information reported by the data controllers within five (5) business days from receipt.
- e) Process inquiries and complaints made by the holders in accordance with the terms set out in this regulation and in the law.
- f) Register in the database the legend "claim in process" in the manner regulated by law, with respect to those unresolved complaints or claims submitted by the owners of personal data.
- g) Insert the legend "information under judicial discussion" into the database once notified by the competent authority about legal proceedings related to the quality of the personal data.
- h) Refrain from circulating information that is being disputed by the owner and whose blocking has been ordered by the Superintendency of Industry and Commerce.
- i) Allow access to information only to people who are authorized to access it.
- j) Report to the Superintendency of Industry and Commerce when violations of security codes occur and there are risks in the management of the information of the holders.
- k) Comply with the instructions and requirements issued by the Superintendency of Industry and Commerce.

Duties of the Data Protection Leader (Integrated Management System Manager)

The role of the Data Protection Officer at INMOV S.A.S. is to ensure the effective implementation of the policies and procedures adopted to comply with legal requirements, as well as the implementation of best practices for managing personal data within the company. Their responsibilities will include structuring, designing, and managing the program, as well as its ongoing evaluation and review. Their duties include, among others:

- a) Promote the development and implementation of a program that allows for the management of personal data risks.
- b) Maintain an inventory of the organization's databases and their data types.
- c) Registering databases in the RNBD and updating them.
- d) Review the contents of international data transmission contracts signed with International Processors.



PERSONAL DATA PROCESSING POLICY

CODE: L9 VERSION: 3
ISSUE DATE: 10-10-2016

- e) Integrate policies into the activities of other areas of the organization.
- f) Accompany the organization during visits and requirements made by the SIC.
- g) Monitor and continuously update the inventory of personal information to identify new collections, uses, and disclosures.
- h) Implement a culture of personal data protection within the organization.
- i) Review policies according to the results of evaluations.
- j) Keep as documents historical the assessments of impact and security threats.
- k) Review and periodically update training and education programs, based on the results of evaluations.
- l) Review and adapt incident protocols based on past experiences.
- m) Review and, if necessary, modify the terms of the contracts signed with the Managers.
- n) Update and clarify external communications to explain data processing policies.
- o) Report semi-annually to the Legal Representative on the evolution of the risk, controls implemented, monitoring, and in general progress and results.

VIII. HABEAS DATA PROCEDURE FOR THE EXERCISE OF THE RIGHTS OF INFORMATION, ACCESS, UPDATING, RECTIFICATION, CANCELLATION AND OPPOSITION

In accordance with the constitutional guarantee of Habeas Data regarding the rights of access, updating, rectification, cancellation and opposition by the owner of personal data, or legally authorized interested party, that is, their successors and legal representatives, INMOV S.A.S. adopts the following procedure:

- ✓ The data subject and/or interested party wishing to exercise one of these rights must prove their status by providing a copy of the relevant document and their identity document, which may be submitted in physical or digital format. If the data subject is represented by a third party, the corresponding power of attorney must be provided, which must be notarized. The attorney-in-fact must also prove their identity as indicated.
- ✓ The request to exercise any of the aforementioned rights must be made in writing, in hard copy. The request to exercise the aforementioned rights may be addressed to the main address of INMOV S.A.S., for the exercise of Habeas Data.
- ✓ The request to exercise any of the aforementioned rights must contain the following information:
 - ✓ Name of the data subject, and of their representatives, if applicable.
 - ✓ A specific and precise request for information, access, updating, rectification, cancellation, opposition, or revocation of consent. In each case, the



PERSONAL DATA PROCESSING POLICY

CODE: L9 VERSION: 3
ISSUE DATE: 10-10-2016

The request must be reasonably justified in order for INMOV S.A.S., as the data controller, to respond.

- ✓ Physical and/or electronic address for notifications.
- ✓ Documents that support the request.
- ✓ Signature of the application by the owner of the personal data.

If any of the requirements indicated here are missing, INMOV S.A.S. will notify the interested party within 5 days of receiving the request, so that they can be corrected, and will then proceed to respond to the Habeas Data request submitted.

If two (2) months have passed without the required information being submitted, it will be understood that the application has been withdrawn.

INMOV S.A.S. may provide physical forms for exercising this right, indicating whether it is an inquiry or a complaint from the interested party. Within two (2) business days following the complete receipt of the request, INMOV SAS will indicate that it is a pending claim. In the corresponding database (PQR), a field must be included indicating the following: "Pending Claim" and "Claim Resolved".

INMOV S.A.S., when responsible for the personal data database contained in its information systems, will respond to the request within ten days. (10) days if it is an inquiry; and fifteen (15) days if it is a complaint. INMOV S.A.S. will issue a decision within the same timeframe when it verifies that its information systems do not contain personal data of the interested party exercising any of the aforementioned rights.

In case of a complaint, if it is not possible to respond within the period of (15) fifteen days, the interested party will be informed of the reasons for the delay and the date on which the complaint will be addressed, which in no case may exceed 8 business days following the expiration of the first 15 days.

INMOV S.A.S., in cases where it acts as the data processor, will inform the data subject or interested party of this situation and will communicate the request to the data controller so that they may respond to the inquiry or complaint. A copy of this communication will be sent to the data subject or interested party so that they are aware of the identity of the data controller and, consequently, the primary party responsible for guaranteeing the exercise of their rights.

INMOV S.A.S. will document and store requests made by data subjects or interested parties exercising any of their rights, as well as responses to such requests. This information will be processed in accordance with the organization's correspondence regulations.



PERSONAL DATA PROCESSING POLICY

CODE: L9 VERSION: 3
ISSUE DATE: 10-10-2016

To go to the Superintendency of Industry and Commerce in the exercise of the legal actions contemplated for data subjects or interested parties, the consultation and/or claims procedure described here must be exhausted beforehand.

IX. CENTRAL REGISTRY OF PERSONAL DATABASES.

INMOV S.A.S., as the data controller of personal data under its custody, in the course of its business activities, as well as with respect to data for which it acts as the data processor, will maintain a central register listing each of the databases contained in its information systems. The central register of personal data databases will allow:

- ✓ Register all personal databases contained in the information systems of INMOV S.A.S. Each database will be assigned a registration number.
- ✓ The registration of personal databases will indicate:
 - (i) The type of personal data it contains;
 - (ii) The purpose and intended use of the database;
 - (iii) Identification of the area of INMOV S.A.S. that processes the database;
 - (iv) Processing system used (automated or manual) in the database;
 - (v) Indication of the level and security measures that apply to the database based on the type of personal data it contains;
 - (vi) Location of the database in the information systems of INMOV S.A.S.;
 - (vii) The group of people or interest group whose data is contained in the database;
 - (viii) The status of INMOV S.A.S., as CONTROLLER or PROCESSOR of the databases;
 - (ix) Authorization for communication or transfer of the database, if any;
 - (x) Origin of the data and procedure in the obtaining of consent;
 - (xi) INMOV S.A.S. official in charge of the database;
 - (xii) Other requirements that may be applicable according to the regulations of the law that may be issued.
- ✓ For compliance and auditing purposes, changes to personal data databases will be recorded monthly in relation to the aforementioned requirements. If the databases have not changed, this will be noted by the custodian.
- ✓ The occurrence and history of security incidents that occur against any of the personal databases held by INMOV S.A.S. will be documented in this central registry.



PERSONAL DATA PROCESSING POLICY

CODE: L9 VERSION: 3
ISSUE DATE: 10-10-2016

- ✓ The record will indicate any sanctions that may be imposed regarding the use of the personal database, specifying its origin.
- ✓ The cancellation of the personal data database will be recorded indicating the reasons and the technical measures adopted by INMOV S.A.S. to make the cancellation effective.

X. PROCESSING OF PERSONAL DATA.

The operations that constitute the processing of personal data by INMOV S.A.S., as the controller or processor thereof, will be governed by the following parameters.

Personal Data related to Human Resource Management.

Data processing prior to the contractual relationship. INMOV S.A.S. will process the personal data of its employees, contractors, as well as those who apply for vacancies, at three times: before, during and after the employment and/or service relationship.

Treatment before employment

INMOV S.A.S. will inform, in advance, those interested in participating in a selection process, of the rules applicable to the processing of personal data provided by the interested party, as well as data obtained during the selection process. Form F11-P28 "RESUME AND INTERVIEW FORMAT".

Once the selection process is complete, INMOV S.A.S. will report any negative results. All information obtained by INMOV S.A.S. regarding those not selected, including resumes, psychometric test results, and interview transcripts, will be deleted from its information systems (within a maximum of 3 months), thus complying with the principle of data retention.

INMOV S.A.S., when contracting personnel selection processes with third parties, will regulate in the contracts the treatment that must be given to the personal data provided by the interested parties, as well as the destination of the personal information obtained from the respective process.

Personal data and information obtained from the selection process regarding the personnel selected to work at INMOV S.A.S. will be stored in the personal file, applying high levels and security measures to this information, given the potential that such information contains sensitive data.



PERSONAL DATA PROCESSING POLICY

CODE: L9 VERSION: 3
ISSUE DATE: 10-10-2016

The purpose of providing the data supplied by those interested in the vacancies of INMOV S.A.S., and the personal information obtained from the selection process, is limited to participation in the same; therefore, its use for different purposes is prohibited.

Data processing during the contractual relationship.

INMOV S.A.S. will store the personal data and information obtained during the employee selection process in a folder identified with each employee's name. This physical or digital folder will only be accessed and processed by the Human Resources Department for the purpose of managing the contractual relationship between INMOV S.A.S. and the employee.

The use of employee information for purposes other than the administration of the contractual relationship is prohibited at INMOV S.A.S. Any other use of employee data and personal information will only be permitted by order of a competent authority, provided that such authority has the power to do so.

The Talent and Quality Management, together with the legal department, will be responsible for evaluating the competence and effectiveness of the order from the competent authority, in order to prevent an unauthorized transfer of personal data.

Data processing after the termination of the contractual relationship.

Once the employment relationship has ended, whatever the reason, INMOV S.A.S. will proceed to store the personal data obtained from the selection process and documentation generated during the employment relationship in a central file, subjecting such information to high security measures and levels, given the potential for employment information to contain sensitive data.

INMOV S.A.S. is prohibited from transferring such information to third parties, as this could constitute a deviation from the purpose for which the personal data was provided by its owners. This prohibition does not apply unless prior written authorization is obtained and documents the consent of the data subject.

The data of Retired Workers will be processed only for the purposes indicated in Decree 1072 of 2015 in article 2.2.4.6.13, where it is established that the records and documents that support the SG-SST must be kept for 20 years, from the date the employment relationship of the worker with the company ceases, or any rule that modifies or adds to it, and for the term established therein.

Processing of personal data of Shareholders.



PERSONAL DATA PROCESSING POLICY

CODE: L9 VERSION: 3
ISSUE DATE: 10-10-2016

The data and information of individuals who become shareholders of INMOV S.A.S. will be considered confidential information, as it is registered in the commercial books and has the character of a confidentiality by legal provision.

Consequently, access to such personal information will be carried out in accordance with the rules contained in the Commercial Code that regulate the matter.

INMOV S.A.S. will only use the personal data of shareholders for the purposes derived from the existing statutory relationship.

Processing of personal data of Suppliers.

INMOV S.A.S. will only collect from its suppliers the data that is necessary, relevant, and not excessive for the purpose of selecting, evaluating, and executing the corresponding contract. When INMOV S.A.S. is legally required to disclose the data of a natural person supplier as a result of a contracting process, this disclosure will be made in accordance with the provisions of this regulation and will inform third parties of the purpose of the information being disclosed.

INMOV S.A.S. will collect from its suppliers the personal data of its employees that is necessary, relevant and not excessive, which for security reasons must be analyzed and evaluated, taking into account the characteristics of the services contracted with the supplier.

The personal data of supplier employees collected by INMOV S.A.S. will have the sole purpose of verifying the moral suitability and competence of the employees; therefore, once this requirement has been verified, INMOV S.A.S. may return such information to the supplier, except when it is necessary to preserve this data.

When INMOV S.A.S. provides employee data to its suppliers, the suppliers must protect the personal data provided, in accordance with the provisions of this regulation. To this end, the corresponding audit procedure will be included in the contract or document that authorizes the transfer of personal data. INMOV S.A.S. will verify that the requested data is necessary, relevant, and not excessive in relation to the purpose justifying the request for access.



PERSONAL DATA PROCESSING POLICY

CODE: L9 VERSION: 3
ISSUE DATE: 10-10-2016

- ***Confidentiality in Purchase Orders***

“THE SUPPLIER undertakes that all information that it has received or that it receives from the officials, employees and advisors of INMOV, which is not public, hereinafter referred to as “THE INFORMATION”, shall be kept strictly confidential.

Consequently, all necessary measures will be taken to ensure that the information does not fall into the hands of third parties, and it is obligated not to use it for any purpose other than to carry out the tasks that derive directly from compliance with this purchase order.

Additionally, the supplier is obligated to return all INFORMATION as soon as the assigned work is completed, or upon INMOV's request. The obligations outlined in this clause will remain in effect even after the expiration or completion of the work covered by the purchase order.

Processing of Customers' Personal Data.

INMOV S.A.S. will only collect from its clients the data that is necessary, relevant, and not excessive for the purpose of conducting market research, offering its service portfolio, carrying out service satisfaction surveys, and maintaining commercial contact within the scope of its business management. When INMOV S.A.S. is legally required to disclose client data or the data of a natural person as a result of an audit process, this disclosure will be made in accordance with the provisions of this Policy and will inform third parties of the purpose of the information being disclosed.

INMOV S.A.S. will collect from its clients the personal data of the contacts it has, which are necessary, relevant and not excessive, which for security reasons must be analyzed and evaluated, taking into account the characteristics of the services contracted with the client.

When INMOV S.A.S. provides employee data to its clients, the clients must protect the personal data provided, in accordance with the provisions of this regulation. To this end, the corresponding audit procedure will be included in the contract or document that legitimizes the transfer of personal data. INMOV S.A.S. will verify that the requested data is necessary, relevant, and not excessive in relation to the purpose justifying the request for access.



PERSONAL DATA PROCESSING POLICY

CODE: L9 VERSION: 3
ISSUE DATE: 10-10-2016

For the use of the personal data processing policy, regarding the Regarding privacy and information protection, the following will be taken into account Privacy and Information Protection Policy.

PRIVACY POLICY FOR WEBSITES AND DOMAINS (Updated: August 2023)

The Privacy Policy of INMOV S.A.S. describes how the company collects, uses, and shares your personal data.

“For the purpose of executing the services offered, INMOV S.A.S. collects your Personal Information on one of our platforms.

By registering your data in our system, you agree that you know and are bound by the company's Personal Data Processing Policy, expressly authorizing the use of your Personal Information for the purposes indicated here and in the manner indicated here.

You therefore expressly acknowledge that, if you do not agree with this Privacy Policy and wish to reserve or limit any of the uses of the information, you will not be able to register in our Databases or provide us with information through our forms, systems and/or web pages.

INMOV collects personal and contact data from natural persons who legally represent, are business contacts and/or are linked to INMOV's clients in employment or business, who, in general terms, are usually legal entities, whether or not they are incorporated in Colombia.

Depending on the circumstances, INMOV S.A.S. may use your consent or the fact that the processing is necessary to fulfill a common contract, to protect your vital interests or those of other people, or to comply with the law.

We may also process your personal data when we believe we are acting in our legitimate interest or in the legitimate interest of other third parties, taking into consideration your interests, rights and expectations.



PERSONAL DATA PROCESSING POLICY

CODE: L9 VERSION: 3
ISSUE DATE: 10-10-2016

Given that the relationship with customers is primarily commercial in nature, INMOV will understand that any contact information it collects in this context is of a public nature because it is data used by people in their capacity as merchants.

Likewise, INMOV will understand that the delivery of any contact data by any of its clients has been previously authorized to them by its owner.

Below are the uses that INMOV will make of your Personal Information, which you expressly authorize by registering in our Databases and providing us with your Personal Information.

- 1. We will contact you in the event that any problem or inconvenience arises with your request.*
- 2. Maintain statistical and administrative controls.*
- 3. To store and classify the information provided by the Holders for easy identification.*
- 4. To consult, compare and evaluate all information about the Holder that is stored in legitimately constituted judicial or security background databases, whether state or private, national or foreign, or any commercial or service database that allows for the comprehensive establishment of their commercial behavior, including consultations in risk centers, lists for the prevention and control of money laundering and financing of terrorism.*
- 5. Analyze, process, evaluate and compare the information provided by the Data Subjects.*
- 6. Sending information of interest and invitations to events scheduled by INMOV.*
- 7. To comply with Colombian or foreign law and with the orders of judicial and/or administrative authorities.*
- 8. Issuance of certifications relating to the relationship between the Data Subject and INMOV.*
- 9. To fulfill all obligations arising from the contractual relationship with the Owners, if one exists.*
- 10. To have the personal information provided at the time of signing the contract in order to fulfill the obligations*



PERSONAL DATA PROCESSING POLICY

CODE: L9 VERSION: 3
ISSUE DATE: 10-10-2016

derivatives of the same.

11. *To carry out the processes of billing, accounts receivable, collection and payments for the products and services that have been provided by INMOV and for the sending of invoices either electronically, physically or by any agreed means.*
12. *To process information in physical and digital media, ensuring the correct registration and use of INMOV's web pages, as well as the applications developed by INMOV and related companies, both nationally and internationally.*
13. *Analysis and use of Personal Information by INMOV, its allies, shareholders, affiliates and/or third parties subcontracted for such purposes, on the occasion of and for the development and execution of its campaigns or product of its services.*
14. *Contacting the Owner to offer new products and/or services related to the organization of conventions and commercial events, including the organization, promotion and/or management of events such as business or commercial exhibitions, conventions, conferences and meetings, and to show advertising or promotions of interest offered by INMOV, and in general to develop the corporate purpose of INMOV.*
15. *We may send emails to data subjects as part of a news or newsletter, or updates related to our business activities and services. Each email includes an option to unsubscribe from this mailing list and stop receiving further emails, as outlined in this Privacy Policy.*
16. *To carry out marketing communications, promotions, and direct marketing campaigns through any means, whether virtual or physical. If the data subject prefers, they may request to be excluded from the lists for sending promotional or advertising information.*
17. *Other communications and activities related to the corporate purpose of INMOV.*
18. *Prevent and detect fraud, as well as other illegal activities.*
19. *To authorize and monitor the entry and stay of individuals at INMOV facilities. For this purpose, INMOV may also collect sensitive data related to the health status of individuals requesting entry.*



PERSONAL DATA PROCESSING POLICY

CODE: L9 VERSION: 3
ISSUE DATE: 10-10-2016

to comply with the biosafety measures established within the framework of the Occupational Health and Safety Management System.

20. *Fulfill legal obligations.*
21. *Contact the Owner in the event of any problem or inconvenience with the information provided; or in order to update contact information.*
22. *Use of Personal Information by INMOV and/or third parties subcontracted for such purposes, on the occasion of and for the development of the company's corporate purpose.*

If you have any questions about the legal basis, you can contact the data protection officer at protecciondedatos@inmov.com”.

Processing of personal data in recruitment processes.

Third parties who, in contracting processes, alliances and cooperation agreements with INMOV S.A.S., access, use, process and/or store personal data of employees of INMOV S.A.S. and/or third parties related to said contractual processes, will adopt, where relevant, the provisions of this policy, as well as the security measures indicated by INMOV S.A.S., according to the type of personal data processed.

For this purpose, the corresponding audit provision will be included in the contract or document that legitimizes the transfer of personal data. INMOV S.A.S. will verify that the requested data is necessary, relevant, and not excessive in relation to the purpose of the processing.

Processing of personal data of the community in general.

The collection of personal data by INMOV S.A.S. in the course of community-related activities, whether as a result of corporate social responsibility or any other activity, will be subject to the provisions of this regulation. To this end, INMOV S.A.S. will first inform and obtain the authorization of the data subjects in the documents and instruments it uses for this purpose and related to these activities.

In each of the cases described above, the areas of the organization that develop business processes involving personal data must consider in their action strategies the formulation of rules and procedures that allow compliance with and enforcement of the standard herein.



PERSONAL DATA PROCESSING POLICY

CODE: L9 VERSION: 3
ISSUE DATE: 10-10-2016

adopted, in addition to preventing possible legal sanctions.

XI. PLATFORM USERS

INMOV S.A.S. conducts part of its business through online information platforms. The users of these platforms are the consumers of the content produced by INMOV S.A.S.

Anyone who chooses to register their data in our system accepts that they know and are bound by this Personal Data Processing Policy, which includes the privacy requirements, terms and conditions of each platform, expressly authorizing the use of their Personal Information for the purposes indicated here and in the manner indicated here.

Therefore, you expressly acknowledge that if you do not agree with this Privacy Policy and wish to reserve or limit any of the uses of your information, you will not be able to register in our Databases or provide us with information through our forms, systems and/or web pages.

The following are the uses that INMOV will make of your Personal Information, which are expressly authorized when you register in our Databases and provide us with your Personal Information.

1. We will contact you in the event of any problem or issue with your registration.
2. Maintain statistical and administrative controls.
3. To contact you to offer you new products and/or services, to show you advertising or promotions of interest offered by us, and in general for the development of our clients.
4. We may send you emails confirming your request, requesting additional information or documents, or as part of a news item or newsletter. Each email includes an option to unsubscribe from our mailing list. To do so, simply reply to the email requesting that you no longer receive information via this method.
5. To send you information about products and/or services offered.
6. To send marketing communications, promotions, and advertising and direct marketing campaigns through any means, whether virtual or physical. If you prefer, you can request to be excluded from the lists for sending promotional or advertising information.
7. Studies to understand profiles, interests, behavior, demographics, segmentations in order to understand your needs, interests and present you with better offers of goods and/or services based on the information provided.
8. Use of names and/or pseudonyms in order to identify ownership of the graphic material uploaded to the platform.



PERSONAL DATA PROCESSING POLICY

CODE: L9 VERSION: 3
ISSUE DATE: 10-10-2016

9. Use of Personal Information by Us and/or third parties subcontracted for such purposes, on the occasion of and for the development of clients.
10. Develop the different logistical and administrative activities that allow your participation in the different activities carried out by INMOV.
11. Advance communication and loyalty activities, as well as the timely handling of Petitions, Complaints, Claims and Suggestions - PQRS, which allow for the evaluation of the quality of the products and services offered by INMOV.
12. To develop advertising, consulting and creative services activities, seeking to strengthen the commercial purpose of INMOV S.A.S.

XII. PROHIBITIONS

In accordance with this personal information security standard of INMOV S.A.S., the following prohibitions and penalties are established as a consequence of non-compliance:

- ✓ INMOV S.A.S. prohibits the access, use, management, transfer, communication, storage and any other processing of sensitive personal data without the authorization of the data subject and/or INMOV S.A.S.
- ✓ Failure by INMOV S.A.S. employees to comply with this prohibition will be considered a serious offense, which may result in termination of employment. This is without prejudice to any legal action that may be taken.
- ✓ Failure to comply with this prohibition by suppliers contracting with INMOV S.A.S. will be considered a serious cause for termination of the contract, without prejudice to any other actions that may be taken.
- ✓ In contracts with suppliers, where the contracted object is related to personal data, a provision will be agreed upon regarding the damages that may be caused to INMOV S.A.S., as a result of the imposition of fines, operational sanctions, among others, by the competent authorities and as a result of the imprudent and negligent actions of the supplier.
- ✓ INMOV S.A.S. prohibits the transfer, communication, or circulation of personal data without the prior, written, and express consent of the data subject or without authorization from INMOV S.A.S. The transfer or communication of personal data must be registered in the company's central personal data registry and have the authorization of the database custodian.
- ✓ INMOV S.A.S. prohibits the access, use, transfer, communication, processing, storage and any other processing of sensitive personal data that may be identified in an audit procedure in application of the standard on the proper use of the organization's computer resources and/or other standards issued by INMOV S.A.S. for these purposes.



PERSONAL DATA PROCESSING POLICY

CODE: L9 VERSION: 3
ISSUE DATE: 10-10-2016

- ✓ Any sensitive data that is identified will be reported to the owner of the data, so that they can proceed to delete it; if this option is not possible, INMOV S.A.S. will proceed to delete it securely.



PERSONAL DATA PROCESSING POLICY

CODE: L9 VERSION:
3
ISSUE DATE:
10-10-2016

- ✓ INMOV S.A.S. prohibits recipients of this regulation from any processing of personal data that could give rise to any of the conduct described in Law 1273 of 2009, "Protection of Information and Data," on computer crimes, unless authorized by the data subject and/or INMOV S.A.S., as applicable.
- ✓ INMOV S.A.S. prohibits the processing of personal data of children and adolescents under the age of 18, except with the express authorization of their legal representatives and/or guardians. Any processing of data concerning minors must ensure the fundamental rights recognized by the Political Constitution, in accordance with the Code for Children and Adolescents.

XIII. INTERNATIONAL DATA TRANSFER.

The transfer of personal data to countries that do not provide adequate levels of data protection is prohibited. Safe countries are understood to be those that comply with the standards set by the Superintendency of Industry and Commerce. Exceptionally, INMOV S.A.S. may carry out international data transfers when:

- ✓ The transfer is necessary for the execution of a contract between the owner and INMOV S.A.S., as the controller and/or processor.
- ✓ These are bank and stock market transfers in accordance with the legislation applicable to such transactions.
- ✓ This involves the transfer of data within the framework of international treaties that are part of the Colombian legal system.
- ✓ Transfers legally required to safeguard a public interest.
- ✓ In the event of an international transfer of personal data, prior to sending or receiving said data, INMOV S.A.S. will sign the agreements that regulate in detail the obligations, burdens and duties that arise for the intervening parties.
- ✓ The agreements or contracts entered into must comply with the provisions of this regulation, as well as with the legislation and jurisprudence applicable to the protection of personal data.
- ✓ The Data Protection Officer, in conjunction with the legal department, will be responsible for approving agreements or contracts involving the international transfer of personal data, adhering to the applicable principles set forth in this regulation. They will also be responsible for consulting with the Superintendency of Industry and Commerce to ensure that the destination and/or origin of the data is considered a "safe country."



**PERSONAL DATA PROCESSING
POLICY**

**CODE: L9 VERSION:
3
ISSUE DATE:
10-10-2016**

**XIV. ROLES AND RESPONSIBILITIES IN COMPLIANCE WITH THE
PROTECTION OF PERSONAL DATA.**



PERSONAL DATA PROCESSING POLICY

CODE: L9 VERSION:
3
ISSUE DATE:
10-10-2016

Responsibility for the proper handling of personal data within INMOV S.A.S. lies with all its employees and company administrators.

Consequently, within each area that handles business processes involving the processing of personal data, they must adopt the rules and procedures for the application and compliance of this policy, given their status as custodians of the personal information contained in the information systems of INMOV S.A.S.

In case of doubt regarding the processing of personal data, the area responsible for information security and/or the Data Protection Officer will be contacted to indicate the guideline to follow, as the case may be.

XV. TEMPORARY NATURE OF PERSONAL DATA.

In the processing of personal data carried out by INMOV S.A.S., the retention period of data in its information systems will be determined by the purpose of said processing. Consequently, once the purpose for which the data was collected has been fulfilled, INMOV S.A.S. will proceed to destroy or return it, as appropriate, or retain it as provided by law, adopting the technical measures necessary to prevent improper processing.

XVI. SECURITY MEASURES

In processing the personal data regulated by this policy, INMOV S.A.S. will adopt physical, logical, and administrative security measures, classified as high, medium, and low levels, according to the risk that may arise from the sensitivity of the personal data processed. In accordance with the principle of Personal Data Security, INMOV S.A.S. will adopt a general guideline on these measures, which will be mandatory for all recipients of this policy.

It is the obligation of the recipients of this policy to inform INMOV S.A.S. of any suspicion that may imply a violation of the security measures adopted by the organization to protect the personal data entrusted to it, as well as any improper processing thereof, once they become aware of this situation.

In these cases, INMOV S.A.S. will notify the supervisory authority of this situation and will proceed to manage the respective security incident regarding personal data, in order to establish the legal repercussions thereof, whether at the criminal, labor, disciplinary or civil level.

XVII. PROCEDURES AND SANCTIONS.



PERSONAL DATA PROCESSING POLICY

CODE: L9 VERSION:
3
ISSUE DATE:
10-10-2016

INMOV S.A.S. informs the recipients of this regulation of the sanctions regime provided for by Law 1581 of 2012 in its article 23, which materializes the risks assumed by improper processing of personal data:

“ARTICLE 23. Sanctions. The Superintendency of Industry and Commerce may impose the following sanctions on Data Controllers and Data Processors:

- a) Personal and institutional fines of up to the equivalent of two thousand (2,000) current legal monthly minimum wages at the time the sanction is imposed. The fines may be successive as long as the non-compliance that originated them persists.*
- b) Suspension of activities related to the Treatment for up to six (6) months. The suspension order will specify the corrective measures that must be taken.*
- c) Temporary closure of operations related to the Treatment once the suspension period has expired without the corrective measures ordered by the Superintendency of Industry and Commerce having been adopted.*
- d) Immediate and definitive closure of the operation involving the processing of sensitive data.”*

The notification of any investigation procedure by any authority, related to the processing of personal data, must be communicated immediately to the Data Protection Officer of INMOV S.A.S., in order to take the measures to defend the actions of the entity and avoid the imposition of the sanctions provided for in Colombian legislation, in particular those contained in Title VI, Chapter 3 of Law 1581 of 2012 described above.

As a consequence of the risks assumed by INMOV S.A.S., either as the Data Controller and/or Processor of personal data, non-compliance with this rule by its recipients is considered a serious offense and will result in the termination of the respective contract without prejudice to any other legally applicable actions.

XVIII. DELIVERY OF PERSONAL DATA TO AUTHORITIES.

When state authorities request INMOV S.A.S. to access and/or provide personal data contained in any of its databases, the legality of the request and the relevance of the requested data to the purpose stated by the authority will be verified. The delivery of the requested personal information will be documented, ensuring that it meets all its attributes (authenticity, reliability, and integrity), and advising the official making the request, the recipient, and the entity for which they work of their duty to protect this data. The authority will be notified.



PERSONAL DATA PROCESSING POLICY

CODE: L9 VERSION:
3
ISSUE DATE:
10-10-2016

that requires personal information, regarding the security measures that apply to the personal data provided and the risks involved in its misuse and inadequate processing.

XIX. PERSONAL INFORMATION SECURITY INCIDENT MANAGEMENT

Personal information security incident management and improvements

INMOV S.A.S. guarantees a consistent and effective approach to managing personal information security incidents, including the communication of security events and weaknesses.

The prioritization of incident handling is based on the criticality of the information.

The Information Officer, as defined in the Business Continuity Plan, must specify the events considered critical along with their respective alerts and information security records, which must be generated.

These systems must be activated, monitored, stored, and reviewed continuously, and any unexpected situations must be reported immediately to the IT-led business continuity committee. The records and the media used to generate and manage them must be protected by controls that prevent unauthorized access or modifications, in order to preserve the integrity of the evidence.

Security incidents resulting from non-compliance with INMOV S.A.S.'s Security Policy and Standards will be addressed by INMOV S.A.S.'s Business Continuity Plan, in conjunction with the Digital Development Management, with the objective of conducting the respective investigation and delivering the results to the respective responsible parties within the Organization, who are in charge of taking the appropriate corrective and preventive actions.

Employees must be informed of the disciplinary process that will be followed in the event of a breach of the Personal Information Security Policy or any of its supporting elements. In any case, follow-up will be conducted in accordance with established procedures for handling security incidents.

Responsibilities and procedures

The responsibility and handling procedure to ensure a quick, effective and organized response to personal information security incidents lies with the business continuity committee and the Digital Development Management.



PERSONAL DATA PROCESSING POLICY

CODE: L9 VERSION:
3
ISSUE DATE:
10-10-2016

Report personal information security events

Personal information security events will be communicated through appropriate management channels as soon as possible.

Security Weakness Notification

Officials and contractors who use personal information systems and services must observe and report any information security weaknesses observed or suspected in the systems or services.

Assessment of personal information security events and decision-making

The Business Continuity Committee, together with the Digital Development Management, are responsible for assessing personal information security events and deciding whether they should be classified as personal information security incidents.

Response to personal information security incidents

Personal information security incidents must receive a response in accordance with the Business Continuity Plan.

Learning from personal information security incidents

The knowledge gained from the analysis and resolution of personal information security incidents should be used to reduce the likelihood or impact of incidents in the future.

Evidence gathering

The company must define and implement procedures for the identification, collection, acquisition, and storage of personal information that may serve as evidence.

XX. CONSIDERATIONS FOR INFORMATION SYSTEMS AUDITS

INMOV S.A.S. minimizes the impact of audit activities on operating systems.

Information systems audit controls



PERSONAL DATA PROCESSING POLICY

CODE: L9 VERSION:
3
ISSUE DATE:
10-10-2016

INMOV S.A.S., based on the Internal Audit Procedure, will verify compliance with the requirements of the applicable ISO standards, current legal regulations, the organization's own requirements, the internal requirements of the process and its procedures.

These audits should conclude on the effectiveness and efficiency of the information systems implemented in the company.

Audit requirements and activities related to the verification of operating systems should be carefully planned and agreed upon to minimize disruption to processes.

XXI. ACQUISITION, DEVELOPMENT AND MAINTENANCE OF PERSONAL INFORMATION SYSTEMS

Security requirements for personal information systems

INMOV S.A.S. guarantees that cybersecurity is an integral part of personal information systems throughout their entire lifecycle. This also includes the requirements for personal information systems that provide services through public networks.

Analysis and specification of security requirements.

Requirements related to the security of personal information will be included in the requirements for new information systems or improvements to existing information systems.

Those responsible for providing solutions must create and maintain a methodology that controls the entire cycle of acquiring, developing, maintaining, and securely disposing of information and infrastructure solutions.

Personal information security requirements must be identified prior to the design or requisition of information and infrastructure solutions.

If internal development is necessary, the requirements must be included within the systems, and if a modification is requested, it must strictly comply with the Information Security requirements that have been previously established.

Information found in production systems cannot be reduced in protection levels nor used in development and testing environments, either for maintenance or for the development of solutions.



PERSONAL DATA PROCESSING POLICY

CODE: L9 VERSION:
3
ISSUE DATE:
10-10-2016

Each personal information or infrastructure solution must maintain a risk management system throughout its lifecycle that continuously reports the level of exposure it represents for the organization.

Any change in the life cycle of an element of the INMOV S.A.S. operating platform must follow the change control and installation accreditation processes, in order to preserve compliance with the Policy.

Protection of transactions over telematic networks

Information involved in application service transactions must be protected to prevent incomplete transmission, misrouting, unauthorized message alteration, unauthorized disclosure, unauthorized message duplication, or reproduction.

Security in development and support processes

INMOV S.A.S. guarantees that the designed and implemented computer security will be fulfilled throughout the personal information systems development life cycle.

Secure Software Development Policy

Rules for the organization's software development will be established and enforced.

Change control procedures in systems

Changes to systems within the development cycle must comply with formal change control procedures.

Technical review of applications after making changes to operating systems

When operating platforms are changed, critical applications must be reviewed and tested to ensure there is no negative impact on the organization's operations or security.

Restrictions on changes to software packages

Modifications to software packages will be discouraged, limited to necessary changes, and all changes will be strictly controlled.

Use of engineering principles in system protection

The principles for secure systems engineering will be applied, documented, and implemented in the implementation of any personal information system.



PERSONAL DATA PROCESSING POLICY

CODE: L9 VERSION:
3
ISSUE DATE:
10-10-2016

Secure development environment

The Digital Development Management must formally define and establish the documentation required in the different stages of the systems life cycle.

outsourced development

The Digital Development Management must have a group of people who must authorize the creation, adaptation or acquisition of software.

Consulting contracts, and all types of service contracts in general, must contain provisions in this regard. Similarly, given the proliferation of outsourcing, it is especially important to clarify the rights generated by suppliers under these types of contracts, which also apply to operations abroad.

Functionality testing during systems development

Functionality testing should be carried out during system development.

System acceptance tests

The formats and procedures of the quality system must be followed for the performance and documentation of the tests.

Test data

INMOV S.A.S. guarantees the protection of the data used for the test.

Protection of test data

Test data must be carefully selected; if real data is selected, it must be protected and controlled.

XXII. VALIDITY

The databases will have a validity period equal to the period in which the purpose or purposes of the processing are maintained in each database, or a validity period indicated by a specific legal, contractual or jurisprudential cause.

This Policy has been approved by decision adopted by INMOV S.A.S., on October 10, two thousand sixteen (2016).



**PERSONAL DATA PROCESSING
POLICY**

**CODE: L9 VERSION:
3
ISSUE DATE:
10-10-2016**

XXIII. CHANGE REFERENCE:

When changes are made to this Policy, the last five changes or modifications must be referenced by the quality manager using the change reference table; the changes or modifications must be approved by the General Management.

Table: Change Reference

Amendment No.	Approval Date			Section(s)	Observations
	Day	We	Year		
1	10	10	2016	All	Issuance of the document
2	30	11	2019	All	Adjustments according to regulatory changes
3	17	04	2023	X. XI. Aim.	Regarding the use of the personal data processing policy, in terms of privacy and information protection, the following information model for the client will be taken into account. Platform users Addition of Law 1266 of 2008, Regulatory Decrees 1727 of 2009 and 2952 of 2010, Addition of Change Reference

**INMOV
S.A.S.
APPROVED
NIT. 802013501**