

DATA POLICY PROCESSING



The following policy for processing personal data has been prepared in accordance with the provisions of Articles 15 and 20 of the Political Constitution of Colombia, the provisions of Act 1581 of 2012, the Regulatory Decree 1377 of 2013, and other related provisions governing the protection of personal data, and will be applied by **INDUSTRIAS NORTECAUCANAS S.A.S.** in order to regulate all matters relating to the collection, storage, use, circulation, removal, disposal and other activities that constitute the processing of personal data.

I. RESPONSIBLE FOR DATA PROCESSING

Business name: INDUSTRIAS NORTECAUCANAS S.A.S.
Tax ID number: 891 500 202-1
Address: Calle 18 # 118 - 85 Av. Cañasgordas # 54
Cali, Valle del Cauca, Colombia
Tel.: (572) 489 6999
e-mail: protecciondedatos@inorca.com.co
Web page: www.inorca.com

II. GUIDING PRINCIPLES

Legality principle regarding data processing: Processing Data is a regulated activity and that is the reason why INDUSTRIAS NORTECAUCANAS S.A.S. is subject to regulatory requirements established for the subject.

Purpose principle: Personal data managed by INDUSTRIAS NORTECAUCANAS S.A.S., has specific and defined purposes, which are informed by this Data Processing Policy and in any case, at the beginning of the business relationship and/or services contracted.

Access principle and restricted circulation: Data processing is subject to the limits derived from the nature of personal data, the legal provisions, and the Constitution, which is why it is performed only by people authorized by the holder and/or authorized third parties.

Temporality principle of information: Information on holder cannot be supplied to users or third parties when the purpose for which they were acquired is extinguished.

Security principle: The information subject to processing will be managed implementing the necessary technical measures to guarantee the security of the records, avoiding their adulteration, loss, unauthorized consultation or fraudulent use.

Confidentiality principle: All persons involved in personal data processing, which do not have the nature of public, are obliged to ensure the confidentiality of the information, even after their relationship ended with some of the work comprising data processing.

Freedom principle: Personal data processing that is not public in nature will be conducted with prior, expressed and informed consent from the owner. Personal data may not be obtained or disclosed without prior authorization or in the absence of legal or judicial mandate that relieves consent.

Accuracy principle or quality of records or data: Information contained in databases must be truthful, complete, accurate, current, verifiable and understandable. Registration and disclosure of partial, incomplete, split or misleading data is prohibited.

III. RIGHTS OF HOLDERS OF INFORMATION

Holders of information collected by INDUSTRIAS NORTECAUCANAS S.A.S. directly or through their representatives, assignees and/or successors may exercise the rights described below:

- 1. Right to know:** By virtue of which holders can access their personal data under the control of INDUSTRIAS NORTECAUCANAS S.A.S. for purposes of consulting, whenever they consider it appropriate, or whenever there are substantial changes to the Information Processing Policy motivating further consultations.
- 2. Right to update:** Holder of information has the right to update his/her personal data when data are partial, fractional or incomplete.
- 3. Right to rectification:** Holder of information has the right to rectify his/her personal data when data are inaccurate or misleading.
- 4. Right to withdrawal or revocation:** Holder of information may revoke authorization and/or request deletion of data when processing is not according to the principles, rights,
- 5. and constitutional and legal guarantees established.** Information may not be revoked where the holder has a legal or contractual duty to remain in the database.
- 6. Right to request proof of authorization:** Except in the events in which, according to legal regulations, no authorization is required for processing.
- 7. Right to be informed:** Regarding the use of personal data.

- 8. Right to complain before the Superintendence of Industry and Commerce:** On penalties for breaking the provisions of current regulations on processing of personal data.
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IV. DUTIES OF INDUSTRIAS NORTECAUCANAS S.A.S.

As the Comptroller of data Processing provided, in order to ensure full exercise of the rights of holders of information and to comply with the provisions of the standard, INDUSTRIAS NORTECAUCANAS S.A.S. is committed to:

1. Ensure owners of information the full and effective exercise of their rights to know, update, and rectify the information on them that remains in our databases.
2. Request and keep a copy of authorization granted by owner.
3. Inform holder of the purpose of collection and their rights by virtue of the authorization granted.
4. Keep information under necessary security conditions to prevent adulteration, loss, use, or unauthorized or fraudulent access to it.
5. Ensure that information put into circulation is according to the principle of truthfulness and quality of the information.
6. Adopt other measures deemed necessary to ensure that information is kept current.
7. Establish mechanisms to ensure timely correction of data when verifying that it contains incorrect information.
8. Handle inquiries and complaints made under the terms set out in this policy, which in every instance must be consistent with the provisions of Law.
9. Adopt an internal manual of policies and procedures to ensure proper compliance with the standard, and especially, in regards to answering inquiries and complaints.
10. Report, at the request of holder of information, on treatment given to data provided.
11. Provide person in charge of processing data, as appropriate, only data for which Processing has been previously authorized.
12. At all times, demand from the person in charge of processing data to respect the security and privacy of holder of information.

13. Inform the person in charge of processing data when certain information is under discussion by the holder, once the claim has been submitted and corresponding procedure has not been completed.
 14. Inform data protection authority when violations of safety codes occur and risks in managing information of holders arise.
 15. Comply with the instructions and requirements disclosed by the Superintendence of Industry and Commerce regarding Personal Data Protection.
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V. CHARACTERIZATION OF TREATED DATA

INDUSTRIAS NORTECAUCANAS S.A.S. developing its social object and taking into account the service offered, may collect data as listed below:

1. General data identifying the individual, family, beneficiaries or third parties, such as full name, identification type, identification number, date and place of issue, name, marital status, and sex among others.
 2. Biometric data of the individual, such as fingerprints, facial or body geometry, and pictures among others.
 3. Location data related to business or professional activity of individuals such as address, phone numbers, and e-mail among others.
 4. Personal location data related to private activity of individuals such as address, phone numbers, and e-mails among others.
 5. Financial data, credit and/or economics rights of individuals.
 6. Socioeconomic data such as strata, and ownership of housing among others.
 7. Patrimonial data of the individual such as movable and immovable property, income, expenses, and investments among others.
 8. Data related to the economic activity of the individual.
 9. Data related to the employment history of the individual, work experience, job title, dates hired/dismissed, annotations, and admonishments among others.
 10. Data related to the educational level, training and/or academic records of individual among others.
 11. General data related to affiliation and contributions to the Integral Social Security System as EPS, IPS, and ARL, dates of entry /withdrawal, and AFP among others.
 12. Access to personal data information systems such as user IP, and profiles among others.
 13. Criminal records data and/or disciplinary actions experienced.
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VI. GATHERING INFORMATION

INDUSTRIAS NORTECAUCANAS S.A.S. collects information kept in their databases through the following means:

- 1. Information coming Directly from Holder.** INDUSTRIAS NORTECAUCANAS S.A.S. through different enabled platforms to render services and develop its social object may collect the information listed under Section V directly from the owner, for which they will request authorization to process it.
- 2. Through suppliers or third parties authorized by the Owner of the Information.** INDUSTRIAS NORTECAUCANAS S.A.S. shall verify that supplier or third party providing the information is authorized by the holder to circulate the information provided.
- 3. Through public information sources.** INDUSTRIAS NORTECAUCANAS S.A.S. directly or through third party suppliers can access available information of public nature for which and according to the provisions of Law 1581 of 2012 and other agreeing regulations, does not require any authorization from Holder. However, and considering that not all the information is accessed through different sources of public information are public data itself, INDUSTRIAS NORTECAUCANAS S.A.S. shall verify that the information subject to processing refers only and exclusively to public data, otherwise it will comply with the provisions of regulations relating to prior and express request of holder of the information.

VII. PURPOSES OF DATA PROCESSING

Personal data provided and/or collected by INDUSTRIAS NORTECAUCANAS S.A.S. are stored in databases listed below and will be used for any of the following purposes:

EMPLOYEES AND/OR SERVICE PROVIDERS

1. Develop the process of an employment relationship and/or rendering services.
2. Comply with labor and/or contractual relationship.
3. Perform process of execution and completion of employment relationships and/or rendering services.
4. Send notifications for application of medical examinations - occupational.
5. Perform registration in the access control system (entrance and exit) to INDUSTRIAS NORTECAUCANAS S.A.S. facilities.
6. Perform the process of affiliation of spouse, children and/or parents to the social security system that employees want to include as beneficiaries.
7. See to internal or external audit processes.
8. Provide, share, send or deliver their personal information to affiliated, related or subordinate companies of INDUSTRIAS NORTECAUCANAS S.A.S. and/or third party collaborators in the event that such companies require the information for contracting purposes.
9. Send physical mails, e-mails, phone or mobile device messages, via text messages (SMS and/or MMS) or through any other analog and/or digital means of communication, information fliers, memos, programing of work schedules, safety and occupational health

or welfare activities, among others related to the existing contractual bond and the development of the social object of INDUSTRIAS NORTECAUCANAS S.A.S.

10. Perform work referencing requested by third parties regarding the development of the contractual relationship held with INDUSTRIAS NORTECAUCANAS S.A.S.

CUSTOMERS AND/OR POTENTIAL CLIENTS.

1. Perform the existing contractual relationship.
2. Provide information on the product and related services or on changes that come about in these.
3. Provide products and/or related services required.
4. Assess product quality and services offered that are related to these.
5. Perform statistical, commercial, strategic, and financial analysis and others that concern the social object of INDUSTRIAS NORTECAUCANAS S.A.S.
6. Send physical mails, e-mails, phone or mobile device messages via text messages (SMS and/or MMS) or through any other analog and/or digital means of communication, commercial, advertising or promotional information about products and related services offered, events and/or promotions of commercial nature, with the purpose of promoting, inviting, directing, executing, reporting and in general, carrying out campaigns, promotions or commercial contests for advertising purposes developed by INDUSTRIAS NORTECAUCANAS S.A.S. and/or by third parties.
7. Consult credit/financial information and make reports for the credit reporting bureaus that INDUSTRIAS NORTECAUCANAS S.A.S. deem appropriate for bonding as a client, lending, referencing and/or report behavioral and/or defaults on payments.
8. Transmission and/or transfer of databases to third parties and/or affiliates for statistical, commercial, strategic, and financial purposes.
9. Perform the commercial references INDUSTRIES NORTECAUCANAS S.A.S. deems necessary for the maintenance, expansion and/or growth of the society.

ELECTRONIC CHANNELS

1. Send physical mails, e-mails, phone or mobile device messages via text messages (SMS and/or MMS) or through any other analog and/or digital means of communication, quotes, commercial, advertising or promotional information about products and services related offered by **INDUSTRIES NORTECAUCANAS S.A.S.** as well as information about campaigns, promotional or commercial contests or advertising character developed by INDUSTRIAS NORTECAUCANAS S.A.S. and/or its delegates.
2. Conduct the necessary technical visits to meet the requirements of potential clients and present the portfolio of products and related services of **INDUSTRIAS NORTECAUCANAS S.A.S.**

SUPPLIERS AND/OR POTENTIAL SUPPLIERS

1. Implement the contractual relationship.
2. Contact and contract the products and/or services INDUSTRIAS NORTECAUCANAS S.A.S. required for the normal functioning of its operation.
3. Provide, share, send, assign, and deliver their personal data to subsidiaries, related or subordinate companies of INDUSTRIAS NORTECAUCANAS S.A.S. and/or third party

- collaborators, in the event that such companies require the information for their purposes.
4. Send physical mails, e-mails, phone or mobile device messages via text messages (SMS and/or MMS) or through any other analog and/or digital means of communication, business, advertising or promotional information about products and related services offered, events and/or promotions of commercial nature, in order to promote, invite, direct, execute, report and in general, carry out campaigns, promotional or commercial contests or advertising purposes, developed by INDUSTRIAS NORTECAUCANAS S.A.S., and/or their delegates.
 5. Make the commercial references INDUSTRIAS NORTECAUCANAS S.A.S. deems necessary for the maintenance, expansion and/or growth of society.
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VIII. PROCEDURE FOR EXERCISING RIGHTS

To exercise rights granted by Law, the holder of the information, duly certified legal representatives, proxies/authorized individuals or assignees, shall perform the following procedures:

1. Download the format to formulate Questions, Updates, Claims or Deletions – C.A.R.S (Spanish acronym for Questions, Updates, Claims, Deletions) found on the website www.inorca.com, request it through e-mail protecciondedatos@inorca.com.co or by calling (+57) (2) 489 6999, during business hours, 8:00 a.m. to 12:00 m., and 2:00 p.m. - 6:00 p.m., Monday through Friday for the format to be provided.
2. Fill out the form Questions, Updates, Claims or Deletions completely – (**Q.U.C.D.**), which will be delivered or sent by delegates from INDUSTRIAS NORTECAUCANAS S.A.S.

Form must be signed by the owner of the information, their duly certified representatives, assignees and/or successors.

For faster and more accurate response to submitted requests, please note that form must include the following information:

- Holder's full name and ID number.
 - Accurate and complete description of facts that originate processing.
 - Physical or email address to send the response and report status of process.
 - Documents and other evidence that are intended to prove facts, if any, or that are directly required by INDUSTRIAS NORTECAUCANAS S.A.S.
3. Send completed and signed form to protecciondedatos@inorca.com.co or deliver it to our offices located at Calle 18 # 118 – 85, Avenue Cañasgordas # 54, in Cali, Valle del Cauca, Colombia.
 4. Once Q.U.C.D., form is sent or delivered, a file number on your application will be generated so you can check the status of it.
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IX. TERMS FOR RESPONDING TO Q.U.C.D. QUESTIONS, UPDATES, CLAIMS AND/OR DELETIONS

Questions and Updates: These shall be resolved within a maximum period of ten (10) working days from the day they were received. If is not possible to answer the question within indicated term, we will inform interested party two (2) business days before the 10 day period expires, stating the reasons for the delay and indicating the date that your request will be addressed, which in no case may exceed five (5) business days after the end of the first term.

Claims and deletions: When we are advised that the information contained in a database of INDUSTRIAS NORTECAUCANAS S.A.S. has to be corrected, updated, deleted, modified or an alleged breach of any legal duty is observed, claims may be submitted through any of the communication channels indicated above. Upon receipt of respective claims, INDUSTRIAS NORTECAUCANAS S.A.S. will have fifteen (15) working days after submission to solve claim counted from the day following its receipt. In case INDUSTRIAS NORTECAUCANAS S.A.S. does not have the competence to resolve the complaint filed, this will be transferred to whom it corresponds within a maximum term of two (2) working days and report the situation to the person concerned.

If the complaint is incomplete, INDUSTRIAS NORTECAUCANAS S.A.S. will ask interested party within five (5) days following receipt of complaint to remedy failures. After two (2) months from the date of application if petitioner does not submit requested information, claim shall be deemed abandoned.

Upon receipt of claim, INDUSTRIAS NORTECAUCANAS S.A.S. shall include in corresponding database a label that says "pending claim" and the reason thereof, within a period not exceeding two (2) business days. The label will stay until the claim is decided.

X. PROCESSING OF SENSITIVE DATA AND/OR MINORS DATA

For the processing of sensitive data or data belonging to a minor, INDUSTRIAS NORTECAUCANAS S.A.S. states that appropriate security measures for their protection were developed and points out:

Sensitive data: INDUSTRIAS NORTECAUCANAS S.A.S. informs holder of sensitive data that he/she has the right to choose not to provide related information on sexual, religious life, political, social organizations or human rights, trade union membership, racial or ethnic origin, biometrical data or data on mental and/or physical health among others whose misuse can cause damage and/or discrimination to holder of information.

Data minors: For INDUSTRIAS NORTECAUCANAS S.A.S. to ensure the constitutional rights of children and adolescents, personal data belonging to minors is optional and should be done

with the permission of parents or legal guardians of the child. INDUSTRIAS NORTECAUCANAS S.A.S. will only use, store, and carry out processing of personal data of minors who are the children, descendants or dependents of employees or contractors, as well as those who may come to appear as associates of INDUSTRIAS NORTECAUCANAS S.A.S., or have rights arising out of filiation with any of them, provided they are of a public nature. The purpose of this treatment is only to plan and conduct activities related to personal and family welfare of associates, employees, and minors, affiliations as beneficiaries to the social security system and sending summons for meetings of associates, as the case may be. For this purpose, INDUSTRIAS NORTECAUCANAS S.A.S. will consider the respect and prevalence of minors' rights, their highest interests and their fundamental rights.

XI. SECURITY OF THE INFORMATION

INDUSTRIAS NORTECAUCANAS S.A.S. have the infrastructure and mechanisms of technical, human, and administrative security to safeguard holders information and prevent unauthorized access to their data or any modification, unauthorized disclosure or destruction of said data.

Holders should be aware that collected data may be stored and/or processed on servers, whether owned or contracted with third-party providers, as well as in physical and/or magnetic means directly located on the premises of INDUSTRIAS NORTECAUCANAS S.A.S., which is authorized by the holders of information when they accept processing of personal data.

XII. ASSIGNMENT OF DATA

When providers, service providers, associated companies, stakeholders or third parties collaborators of INDUSTRIAS NORTECAUCANAS S.A.S. due to contractual reasons request transference of information contained in databases managed by the company, they must request it in writing via e-mail to protecciondedatos@inorca.com.co Said application shall state clearly and unequivocally, the need motivating the request. Similarly, they must confirm that use of the information contained in that (those) database(s) will be subjected to the personal data processing policy implemented by INDUSTRIAS NORTECAUCANAS S.A.S., and will inform the security measures used once the requested database is delivered.

XIII. VALIDITY OF DATABASES

Personal data collected in INDUSTRIAS NORTECAUCANAS S.A.S. will be in force during the time it takes to fulfill its purposes and to allow compliance with its legal and contractual obligations, period which is usually ten (10) years counted from the last processing done, except for databases that by legal provision must be stored for a longer period than the one



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referenced above. Once these terms are expired and in accordance with the provisions of regulations concerning filed data, personal data contained in these databases will be eliminated, both physical data files and/or magnetic data that contain personal information.

XIV. ADVERTISING AND VALIDITY OF POLICY

This Policy for Processing Personal Data will be published and shall be considered in force as of the first (01) day of May, 2017.

Legal Representative
INDUSTRIAS NORTECAUCANAS S.A.S.
TAX ID No. 8 91 500 202-1