



PERSONAL DATA PROCESSING POLICY



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Introduction



KRAOBI CONSULTORES SAS is committed to safeguarding the constitutional right to *habeas data*, including the privacy and confidentiality of our clients, suppliers, employees, contractors, and their good name either active or inactive, occasional or permanent. This policy has been developed to govern the use and management of information processed by the company in its database management system. The purpose of this policy is to ensure the protection of information owners' rights and to facilitate the correction, clarification, or deletion of information as requested.



This Personal Data Processing Policy will be applied to all databases and/or files containing personal data of our active or inactive, occasional or permanent clients, suppliers, employees and contractors who are subject to data processing by **KRAOBI CONSULTORES SAS**.



Legal Framework



This Personal Data Processing Policy is governed by the current legislation on personal data, as outlined in Article 115 of Colombia's Constitution, Law 1266 of 2008, Law 1581 of 2012, Decree 1377 of 2013, Decree 1727 of 2009, and other supplementary regulations that modify, repeal, or replace them.



Definitions



Authorization	Previous, express and informed owner's consent to process personal data.
Privacy notice	This is a formal statement issued by the controller to the owner regarding its personal data processing. The statement may be communicated verbally or in writing. This information concerns the existence of information processing policies that must be applied, as well as how to access them and their respective processing purposes.
Database	An organized set of personal data subject of processing.
Clients	Natural or business person on which KRAOBI CONSULTORES SAS maintains a business relationship.
Processing:	Any operation or set of operations on personal data, such as gathering, storing, using, circulating or data deleting.



Definitions



Personal data:	Information that may be linked or associated with one or several natural persons, as indicated or undetermined, may include the following: full name, ID, address, email, phone number, marital status, health data, fingerprint, salary, assets, financial statements, etc.
Public data:	The data that is determined by law or the Constitution, including those that are not semiprivate or private.
Semi-private data:	They are the non-private, reserved nor public nature data whose knowledge or release may be interest to more than just the owner. These data may be released to specific sectors or groups of people.
Private data:	Data considered as private or reserved, and its relevance depends on the information owner.



Definitions



Sensitive data	The data in question pertains to the owner's privacy, and its inappropriate usage may result in discrimination.
Data Controller:	Natural or business person - public or private – either alone or in association with others performs Data Processing on behalf of Processing Controller. In the event that Controller does not exercise as Database responsible, the person designated as In-charge will be expressly identified.
Controller:	Natural or business person - public or private – either alone or in association with others decides on Database and/or Data Processing.
Claim:	In accordance with applicable law, the data owner, authorized individuals or legal entities may submit a request to correct, update, or delete personal data, or to revoke authorization.
Owner:	Natural person whose Personal Data are subject of processing.



Principles



KRAOBI CONSULTORES will apply the following principles which constitute the rules to be followed in terms of manage, use, gathering, processing, storing and exchange of personal data:

Accuracy or quality principle	The information contained in databases must be right, complete, accurate and understandable.
Purpose principle.	The processing of data must adhere to legitimate purposes as defined by the constitution and applicable laws. The owner must be informed of this matter.
Legality principle	The personal data processing will be done pursuant to the applicable legal provisions (Statutory Law 1581, 2012 and its regulations).



Principles



Timeliness of Information Principle	The owner's information will not be disclosed to users or third parties once its use for database purposes is no longer viable.
Transparency principle	The right of the owner to obtain information about the data that exists concerning them must be ensured at any time from the company or controller.



Controller



Business name: KRAOBI CONSULTORES SAS

Tax ID: 900.588.892-1

Main domicile: Carrera 11b 99 25 OF 11-109

Email: contacto@kraobi.com

Phone number: 3245627151



Purpose



The processing personal data purpose on behalf of KRAOBI CONSULTORES SAS, is:

- To facilitate the dissemination of information to its employees.
- For procedures related to social security and compensation funds for employees of KRAOBI CONSULTORES SAS.
- To recognize, protect and exercise the COMPANY shareholders' rights.
- To strengthen business relationships with clients, relevant information, proposal submissions, news, and the addresses of requests, complaints, and claims need to be sent.
- To check its creditor's balances.
- To determine outstanding obligations, consult financial information and credit history, and report to credit bureaus regarding defaulted obligations with respect to its debtors.



Purpose



- To improve, advertise and develop its accounting, financial, Audit, statutory auditing and tax services.
- For marketing, statistics and research activities and other business purposes that do not violate the current Colombian legislation.
- To address court, law and administrative requirements, and for the compliance of legal or judicial mandates.
- To eventually establish contact with individuals via email or other means, including current or previous contacts.
- For the rendering of services contracted by the clients.



Personal Data Owner Rights.



Pursuant to current law governing personal data processing, the owner's rights include the following:

- To maintain accuracy and integrity of personal data; individuals are responsible for updating and rectifying information as necessary. This process is especially crucial for those acting as processors, controllers, or responsible parties in the handling of personal data. This right would be exercised in situations where data is partial, inaccurate, incomplete, fractioned, or otherwise causes errors; or if its processing is expressly prohibited or not authorized.
- Unless expressly exempted as a request for processing, the responsible parties must provide proof of the authorization granted, in accordance with the provisions of Article 10 of Law 1581 of 2012.
- The responsible party or processor in charge must provide the individual with information regarding the use given to their personal data, upon request.
- Access to its personal data that have been subject of processing, free of charge.



Authorization



KRAOBI CONSULTORES SAS must obtain explicit permission from the individuals whose personal data is to be processed. This permission can be given in advance and must be informed, like this:

- Upon prior authorization: The owner's consent must be obtained prior to the collection of personal data.
- Upon express authorization: The owner's consent must be explicit and direct; open and non-specific consents are not valid. It is required that the owner expresses its willingness to authorize that the COMPANY processes its personal data.

The owner's willingness to authorize may be given through different mechanisms made available by **KRAOBI CONSULTORES SAS** such as:

- a) In a written form.
- b) Orally, through a phone conversation or videocall.



Authorization



The company is able to conclude that its consent was granted through unequivocal conduct, such as the express authorization to the terms and conditions of participants for the applicable data processing.

In any case **KRAOBI CONSULTORES SAS** will assume owner's silence as an unambiguous conduct.

Regardless of the mechanism used by **KRAOBI CONSULTORES SAS**, it is essential that authorization be maintained for future consultation.



Term, Authorization and Security



- The present policy comes into effect from its release date which, for all the effects, will be May 25, 2017.
- Any update and/or modification made to this Personal Data Processing Policy, must be informed by KRAOBI CONSULTORES SAS.
- Pursuant to article 19 Decree 1377 of 2013, **KRAOBI CONSULTORES SAS** is committed to adopt the instructions set by the Colombia's Superintendence of Industry and Trade for such purposes.

Notwithstanding the aforementioned, the Company has implemented information security policies and a technology infrastructure designed to safeguard personal information collected, while restricting third-party access to the greatest extent feasible.



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