



Personal Data Processing Policy

HUGO RESTREPO Y CÍA S.A.

In compliance with the duties established for the treatment of personal data and information of a personal nature owned by third parties by Law 1581 of 2012 "by which general provisions for the protection of personal data are issued" and in the Sole Regulatory Decree of the Industry, Commerce and Tourism Sector No. 1074 dated May 26, 2015 and No. 1759 of November 8, 2016, as well as in other rules that add, modify or regulate it, HUGO RESTREPO Y CIA S.A. and its subordinate companies (hereinafter "hereinafter H. 1759 of November 8, 2016, as well as in the other rules that add, modify or regulate it, HUGO RESTREPO Y CIA S.A. and its subordinate companies (hereinafter "H.R y CIA"), legally constituted commercial company, with its main domicile in the city of Yumbo, department of Valle del Cauca, and identified with the NIT 830052685-9, informs the public of our policy for the treatment of personal data (hereinafter "PTDP").

The purpose of the PTDP is to inform and define both the rules for the treatment of information and personal data within our company as well as the guidelines for data owners to exercise in a timely and effective manner their rights to privacy, good name and information in the terms of Articles 15 and 20 of the National Constitution of the Republic of Colombia, especially with regard to the power of all persons to "know, update and rectify the information that has been collected about them in databases or files", we recommend a judicious reading of this document.

TABLE OF CONTENTS:

- PURPOSE, LEGISLATION AND SCOPE OF APPLICATION
- DEFINITIONS AND GUIDING PRINCIPLES
- RIGHTS OF THE OWNERS AND DUTIES OF THE DATA CONTROLLER
- AUTHORIZATION FOR THE PROCESSING OF PERSONAL DATA
- TREATMENT AND PURPOSES OF TREATMENT
- ATTENTION TO REQUESTS, INQUIRIES AND COMPLAINTS
- PROCEDURE FOR THE PROCESSING OF PERSONAL DATA
- EFFECTIVENESS

Harvesting Tradition since 1976



- VALIDITY OF DATABASES AND REGISTRATION IN THE RNBD

A. PURPOSE, LEGISLATION AND SCOPE OF APPLICATION:

1. PURPOSE: This document, containing the policies for the treatment of information and personal data of **H.R y CIA** aims to comply with the provisions of Title VI of Law 1581 of 2012, specifically the provisions contained in Articles 17 and 18 thereof, as well as the provisions of Section 3 of Chapter 25 of the Sole Regulatory Decree 1074 of 2015, by which the aforementioned law was regulated. In accordance with the above, the procedures established by our company to make a proper treatment of information and data owned by third parties are described below.

2. APPLICABLE LEGISLATION AND INTERPRETATION: The PTDP of **H.R y CIA** shall be subject to the provisions contained in Law 1581 of 2012 and in the Single Decree 1074 of 2015 that regulates it; for such reason, any gap in the aforementioned regulations shall be interpreted in accordance with the provisions of Colombian law in general, as well as in light of Articles 15 and 20 of the National Constitution of the Republic of Colombia.

3. SCOPE OF APPLICATION: The PTDP of **H.R y CIA** will be applicable to the company, its subsidiaries, whether subsidiaries or subordinates, that by virtue of the operation and the legal and responsible development of the company's corporate purpose, have collected or obtained information or personal data owned by distributors, suppliers, customers, employees, employees, shareholders or third parties in general.

B. DEFINITIONS AND GUIDING PRINCIPLES:

4. DEFINITIONS OF THE PTDP : **H.R y CIA** informs the holders of the information and personal data of the following definitions and concepts whose reiterative use in the framework of the PTDP imposes the duty on the company to inform in a complete and timely manner about the scope of the different notions, in accordance with the provisions of Articles 3, 5 and 26 of Law 1581 of 2012 and as regulated by Article 2.2.2.2.25.1.3 of the Sole Regulatory Decree 1074 of 2015:

1. 4.1. Authorization: Authorization is understood as the prior, express and informed consent that the owner of the information and personal data may give to **H.R y CIA** so that the latter may carry out activities involving the processing of such data and information.

Harvesting Tradition since 1976



2. 4.2. Data Base: The database is understood as the organized set of personal data that is subject to processing by **H.R y CIA.**

3. 4.3. Personal data: Any information linked or that may be associated to one or several determined or determinable natural persons.

4. 4.4. Sensitive data: Sensitive data is understood as that which affects the privacy of the holder or whose improper use may generate discrimination, such as data revealing racial or ethnic origin, political orientation, religious or philosophical convictions, membership in trade unions, social organizations, human rights organizations or that promote the interests of any political party or that guarantee the rights and guarantees of opposition political parties, as well as data related to health, sexual and reproductive life and biometric data.

5. 4.5. Public data: Public data is understood as data that is not semi-private, private or sensitive. In general, public data are considered to be, among others, those relating to the civil status of individuals, their profession or trade, and their status as merchants or public servants. Due to their nature, public data may be contained, among others, in public records, public documents, official gazettes and bulletins, as well as in duly executed judicial sentences that are not subject to confidentiality by express legal provision.

6. 4.6. Data Processor: Natural or legal person, public or private, who by itself or in association with others, carries out the processing of personal data on behalf of the Data Controller.

7. 4.7. Data Controller: Natural or legal person, public or private, who by itself or in association with others, decides on the database and / or data processing. For the purposes of this PTDP, H.R y CIA acts as data controller simultaneously.

8. 4.8. Data Subject: Natural person whose personal data is the object of processing.

9. 4.9. Processing: Any operation or set of operations on personal data, such as collection, storage, use, circulation or deletion.

4.10. Privacy Notice: Verbal or written communication generated by the data controller, addressed to the owner of the information and personal data, by means of which he/she is

Harvesting Tradition since 1976



informed about the existence of the H.R y CIA's PTDP that will be applicable, the way to access them and the purposes of the treatment that is intended to be given to his/her personal data.

4.11. Transfer: The transfer of data takes place when the person responsible and/or in charge of the processing of personal data, located in Colombia, sends the information or personal data to a recipient, who in turn is responsible for the processing, and is located inside or outside the country.

4.12. Transmission: Transmission is a form of processing of information and personal data that involves the communication of the same within or outside the territory of the Republic of Colombia, when its purpose is the performance of processing activities by the person in charge, but always on behalf of the controller.

4.13. National Registry of Databases: It is the public directory of personal data bases subject to processing activities operating in the country, whose administration is in charge of the Superintendence of Industry and Commerce as the highest administrative authority of surveillance and control in matters of personal data processing and habeas data.

5. GUIDING PRINCIPLES FOR THE PROCESSING OF PERSONAL DATA: **H.R y CIA** , in its capacity as responsible for the processing of personal data, declares that this PTDP is in accordance with the legal provisions contained in Law 1581 of 2012 and in the Single Regulatory Decree 1074 of 2015, so that in the development of processing activities, in the application of the PTDP, and in the interpretation thereof based on the aforementioned rules, the principles of legality, purpose, freedom, truthfulness or quality, transparency, restricted access and circulation, security and confidentiality shall be applied harmoniously, in the terms provided by Article 4 of Law 1581 of 2012.

C. RIGHTS OF THE OWNERS AND DUTIES OF THE DATA CONTROLLER:

6. RIGHTS OF THE OWNERS OF PERSONAL DATA: Pursuant to the provisions of Title IV of Law 1581 of 2012, **H.R y CIA** must guarantee to the owners of the information and personal data subject to processing, the exercise of the following rights at any time and without compliance with further requirements:

Harvesting Tradition since 1976



1. 6.1. Know, update and rectify your personal data against H.R y CIA in its capacity as data controller. This right may be exercised, among others, against partial, inaccurate, incomplete, fractioned, misleading or those whose treatment is expressly prohibited by law or has not been authorized by the owner.

2. 6.2. Request proof of the authorization granted to **H.R y CIA** in its capacity as data controller, except when expressly exempted as a requirement for treatment, in accordance with the provisions of Article 10 of Law 1581 of 2012.

3. 6.3. To be informed by **H.R y CIA**, in its capacity as data controller, upon request, regarding the use that has been made of their personal data.

4. 6.4. To file before the Superintendence of Industry and Commerce complaints for violations to the provisions of this law and other regulations that modify, add or complement it.

5. 6.5. To revoke the authorization and/or request the deletion of personal data when the treatment of those **H.R y CIA** does not respect the principles, rights and constitutional and legal guarantees.

* In any case, such revocation and/or suppression will only proceed when the Superintendence of Industry and Commerce has determined that in the development of the processing activities, the company has incurred in conduct contrary to Law 1581 of 2012 and the National Constitution of the Republic of Colombia.

7. LEGITIMACY FOR THE EXERCISE OF THE RIGHTS OF THE OWNER: Pursuant to the provisions of Article 2.2.2.2.25.4.1 of the Sole Regulatory Decree 1074 of 2015, the rights of the owners of personal data and information may be exercised by the persons mentioned below:

1. 7.1. By the respective owner, who must prove his identity sufficiently by the different means made available by the person in charge.

2. 7.2. By their successors in title, who must provide proof of such capacity.

Harvesting Tradition since 1976



3. 7.3. By the holder's representative and/or attorney-in-fact, upon accreditation of the representation or power of attorney.

4. 7.4. By stipulation in favor of or for another.

5. 7.5. In the event that the owner of the information is a minor, their rights may be exercised only by persons who in accordance with the law are empowered to represent them.

8. DUTIES OF THE PERSONS RESPONSIBLE FOR THE PROCESSING: H.R y CIA, in its capacity as responsible for the processing of personal data, recognizes that it is obliged to comply with the duties established in Title VI of Law 1581 of 2012.

D. AUTHORIZATION FOR THE PROCESSING OF PERSONAL DATA:

9. MEASURES IMPLEMENTED TO GUARANTEE ACCESS TO THE PTDP : To the extent that H.R y CIA has collected personal data and information at times prior to the entry into force of Decree 1377 of 2013, that is, before June 27 of that year, the company, in order to fully comply with the provisions of paragraph 1 of Article 2.2.2.25.2.7 of the Sole Regulatory Decree 1074 of 2015, made use of the efficient communication mechanisms referred to in numeral 2o of the same provision, that is, "those that the responsible or in charge use in the ordinary course of their interaction with the owners registered in their databases", in order to request a new authorization to the owners of the mentioned information and personal data, as well as in order to inform them of these PTDP through the respective privacy notice, in the event that it was not possible to make this PTDP available to them.

10. AUTHORIZATION OF THE OWNER: Any activity of collection, conservation, use, handling, updating, correction, deletion and, in general, any activity through which it is intended to obtain and/or process personal data and information owned by third parties, shall be carried out with the prior, express, free and informed authorization of their respective owners. In any case, with the granting of the authorization by the holder for the collection and processing of information and personal data, it is understood that the holder has read the PTDP contained herein, since he/she has been informed verbally and in writing that the PTDP are available to the public and that they can be requested at any time through the e-mail ginna.leon@hugorestrepo.com. Likewise, by means of the authorization for the collection and processing of personal information and data, the

Harvesting Tradition since 1976



holder declares that such data and information are truthful, complete, accurate, updated, verifiable, understandable and correspond to the reality in force at the time they are provided.

11. MECHANISM OF PROOF OF THE AUTHORIZATION OF THE HOLDER : H.R y CIA will make available to the holders of the information and personal data to be processed, the authorization document in order to ensure that there is a free, express, prior and written consent, sufficiently informed. The authorization granted by the owner of the information may be in writing, either in a physical document or on magnetic media, as well as in audio files, online data storage technology platforms or any other suitable and apt means to prove the existence of the owner's consent and authorization for the processing of his personal data.

For those cases in which a written contract of any nature is signed between the owner of the information and personal data and H.R y CIA, it will be feasible to include in that document or in their respective other documents, as appropriate, the prior authorization for the processing of personal data.

12. CASES IN WHICH AUTHORIZATION IS NOT NECESSARY: Under the terms of Article 10 of Law 1581 of 2012, the authorization of the holder will not be necessary when the information or data subject to processing is one of those described below:

12.1. Information required by a public or administrative entity in the exercise of its legal functions or by court order.

2. 12.2. Data of a public nature.

3. 12.3. Cases of medical or sanitary emergency.

4. 12.4. Processing of information authorized by law for historical, statistical or scientific purposes.

5. 12.5. Data related to the civil registry of persons.

13. REVOCATION OF AUTHORIZATION AND REQUEST FOR DATA SUPPRESSION: In accordance with the provisions of Article 9 of Law 1581 of 2012, the owners of the information and personal data may request at any time to H.R y CIA, in its capacity as data controller, the deletion of their

Harvesting Tradition since 1976



personal data and/or the revocation of the authorization granted for the processing thereof, upon submission of a claim.

Under the terms of the first paragraph of Article 2.2.2.2.25.2.6 of the Sole Regulatory Decree 1074 of 2015, the request for deletion of the information and the revocation of the authorization shall not proceed when the holder of the information has a legal or contractual duty to remain in the database.

Upon expiration of the term established to respond to the request for revocation of authorization or deletion of personal data, without H.R y CIA having revoked the authorization or deleted the data, the holder shall have the right to go to the Superintendence of Industry and Commerce so that said entity, in use of its administrative or jurisdictional powers, orders the revocation of the authorization and/or the deletion of personal data, after exhausting the sanctioning procedure established in Article 22 of Law 1581 of 2012.

E. TREATMENT AND PURPOSES OF TREATMENT:

14. Considering the way a database is stored, a distinction can be made between automated databases and manual databases or archives. Automated databases are those that are stored and managed with the help of computer tools.

Manual databases or files are those whose information is organized and stored in a physical form, such as supplier order forms containing personal information related to the supplier, such as name, identification, telephone numbers, e-mail, etc.

H.R y CIA will process personal data of its personnel entering the company's facilities, users of digital applications that the company manages, employees, collaborators, suppliers and their collaborators, prospective customers and their collaborators and customers, along with their collaborators.

In development of the principles of purpose and freedom contemplated in the Law, the collection of personal data by **H.R y CIA** will be limited to those personal data that are relevant and appropriate for the purpose for which they are collected or required in accordance with current

Harvesting Tradition since 1976



regulations. Except in cases expressly provided by law, no personal data will be collected without the authorization of the Data Subject.

H.R y CIA will maintain the confidentiality of the personal data subject to processing and will only disclose them at the express request of the oversight and control entities and authorities that have the legal authority to request it and will allow at all times and free of charge to know, update and correct the personal information of the Holder in accordance with the Law.

Data processing includes the collection, storage, management, use, transfer, transmission and destruction, as permitted by law, and is carried out for the following specific purposes in each case:

1. a) Processing of personal data of collaborators, employees and former employees: This is done to comply with the labor obligations of **H.R y CIA**, such as payroll payments, Occupational Health and Safety reports, payments and reports to the general social security system, DIAN and other control agencies, granting benefits to employees and their families, attention to inquiries, requests, applications, actions and claims, made by the Holder of the information or by persons authorized by this or the Law, or by entities of the general social security system to which the Holder is or has been linked. In the case of former employees, treatment is carried out in order to maintain a contact for the requirement of a work performed, proof of linkage, social security payments, tax supports, attending contractual, legal or judicial needs.
2. b) Processing of personal data of personnel accessing the Company's facilities: **H.R y CIA** stores recordings of natural persons entering the Company's facilities, understood as biometric data. The processing of this personal data is carried out for security purposes, control of entry and exit of visitors.
3. c) Processing of personal data of contractors natural persons and natural persons linked to contractors: This treatment is intended to allow **H.R y CIA** to comply with the contractual obligations under its responsibility, such as allocation and control of technological elements, materials and equipment in general, entry and exit of the different facilities, monitoring compliance with obligations under Contractors, attention to possible emergencies, response to inquiries, requests, applications, actions and claims, made by the owner of the information or legitimate persons.

Harvesting Tradition since 1976



4. d) Processing of personal data of Suppliers natural persons and natural persons linked to the supplier: Allows compliance with contractual obligations of **H.R y CIA**, such as payment of fees, payment reports, reports or interactions that by law or by internal policies has the obligation to perform, attention to inquiries, requests, applications, actions and claims, made by the owner of the information or their legitimate.

5. e) Processing of personal data of Customers natural persons and natural persons related to the client: The Processing of personal data of Customers who are natural persons, has the purpose that **H.R y CIA** can fulfill the contractual obligations under its responsibility, such as billing, payment reports or interactions that by law or by internal policies has the obligation to perform, attention to inquiries, requests, applications, actions and claims, made by the Holder of the information or by their legitimaries.

6. f) Processing of personal data of prospective customers natural persons and natural persons linked to the prospective customer: The Processing of personal data of Customers who are natural persons, has the purpose that **H.R y CIA** can fulfill the contractual obligations in charge, such as seeking to develop the commercial, marketing, sales and other relevant areas of the company.

7. g) Processing of personal data of shareholders, legal representatives, administrators, natural or legal persons: Its purpose is to enable **H.R y CIA to comply with its** contractual obligations, as well as to identify risk factors and financial health of the companies of which they are part.

15. PROSCRIPTION OF THE TREATMENT OF PERSONAL DATA OF MINORS: **H.R y CIA** knows and respects the prohibition established in Article 7 of Law 1581 of 2012 regarding the processing of data of children and adolescents, except in those cases in which the same are those data susceptible to be considered as public nature.

Therefore, and in the event that the company intends to advance processing activities of public personal data owned by minors, **H.R y CIA** will advocate and respect the best interests of these, ensuring absolute respect for their fundamental rights. Likewise, **H.R y CIA** will refrain from submitting such data to processing activities without the respective authorization of the legal representative of the minor holder of the information under the terms of law and in accordance with this PTDP, after exercising the right of the minor to be heard, in attention to their ability to know and understand the terms of the authorization granted by their representatives.

Harvesting Tradition since 1976



16. TREATMENT TO WHICH THE DATA WILL BE SUBMITTED: **H.R y CIA** guarantees that the information contained in its database will be used correctly and for lawful purposes, in accordance with current regulations and without prejudice to the right to habeas data protected by the National Constitution of the Republic of Colombia. The treatment of the personal data described above by the company will be limited only to the activities of collection, storage and use. In some cases, **H.R y CIA** may transmit the personal data collected, prior express authorization for that purpose by the holder, to the producers and / or manufacturers of goods or services marketed by **H.R y CIA** and companies that have the quality of parent or controlling **H.R y CIA**, who will act as responsible for the treatment, under the terms and conditions of their own policies for the processing of personal data. Personal data. The above, with the purposes described in the following article.

FIRST PARAGRAPH: **H.R y CIA** guarantees to all depositors of information and personal data that it will not be used for purposes other than those respectively authorized by their owners, nor will it be sold or marketed to third parties under any figure, nationally or internationally, without prior authorization.

F. ATTENTION TO REQUESTS, INQUIRIES AND COMPLAINTS:

17. ATTENTION OF PETITIONS, CONSULTATIONS AND CLAIMS: **H.R y CIA** has enabled the emails: lissa.nicolle@hugorestrepo.com and ginna.leon@hugorestrepo.com as a channel to adequately and timely address requests, queries and claims that the holders of information and personal data raise to the company.

Notwithstanding the foregoing, the requests and claims referred to in paragraph G of this PTDP, may be filed in writing at the offices of the company, located at CL 9 N. 21-45 in the municipality of , department of Yumbo - Valle del Cauca.

18. PERSONS TO WHOM THE INFORMATION MAY BE PROVIDED: Under the terms of Article 13 of Law 1581 of 2012, information and personal data may be provided by **H.R y CIA**, upon written request to that effect, to the following persons:

1. 18.1. To the respective owners, their assignees or their legal representatives.

Harvesting Tradition since 1976



2. 18.2. To public or administrative entities in the exercise of their functions.

3. 18.3. To third parties who have been expressly authorized by the owner of the data or who by express legal provision are empowered to request the information.

TERM FOR RESOLVING CONSULTATIONS: In accordance with the provisions of Article 14 of Law 1581 of 2012, **H.R y CIA** is obliged to respond to queries raised by the owners of personal data or their respective assignees to consult and know the personal information subject to processing, within a maximum period of ten (10) working days from the date of filing the request.

In the event that the company is unable to comply with the request within the term described above, it shall be obliged to notify the applicant of the reasons for the delay and, in any case, shall respond to the request within five (5) business days following the expiration of the first term.

20. TERM FOR RESOLUTION OF PETITIONS AND CLAIMS: In accordance with the provisions of paragraph 3 of Article 15 of Law 1581 of 2012, requests that are not related to a request for knowledge or consultation of the information under treatment, as well as claims filed by the owners or their respective assignees, must be resolved by **H.R y CIA** within a period not exceeding fifteen (15) days from the day following the date of filing.

In the event that the company cannot attend the request or claim within the term described above, it shall be obliged to notify the applicant about the reasons that gave rise to the delay and, in any case, shall respond to the request within eight (8) working days following the expiration of the first term.

21. REQUIREMENT OF PROCEDIBILITY: The submission of inquiries, petitions and complaints to the company is a requirement of procedural requirements to file a complaint with the Superintendence of Industry and Commerce in the event of an alleged violation of the rights of the owners of personal information or data, so that the entity will not process complaints that are filed without the exhaustion of the aforementioned prior stage. All of the above, in accordance with the provisions of Article 16 of Law 1581 of 2012.

G. PROCEDURE FOR THE TREATMENT OF PERSONAL DATA:

Harvesting Tradition since 1976



22. GENERAL CONSIDERATIONS REGARDING THE TREATMENT OF INFORMATION AND PERSONAL DATA: **H.R y CIA** collects information and personal data through the documents required for the connection of customers, suppliers, through the resumes submitted by workers in the selection processes and documents necessary for the connection of the same to the various social security systems and occupational hazards, as well as those provided by customers for the fulfillment of the purposes previously indicated.

The information and personal data collected by **H.R y CIA** will be stored in physical and digital media depending on the type of data and the media in which it is recorded. **H.R y CIA** will have reasonable physical and technological measures to ensure the protection and integrity of the data stored by **H.R y CIA** as well as to address in a timely manner any incident that occurs and represents a risk to the personal data being processed.

23. PROCEDURE TO KNOW THE INFORMATION: The holders of the information or personal data or their respective beneficiaries may consult the personal information of the holder that is in the databases of **H.R y CIA**. To do so, they may file a written request or via e-mail addressed to the company's offices.

In case the request is filed in writing, the document must contain, at least, the full name of the owner and his identification number, full name and identification of the applicant, indication of the request for knowledge and access to the information being processed in a clear and concise manner, and data for notification (address, telephone, cellular or cell phone and e-mail).

H.R y CIA shall provide a response to the request for consultation or knowledge of the information within the term established in paragraph F of this PTDP, in accordance with the provisions of Article 14 of Law 1581 of 2012.

PROCEDURE FOR SUBMITTING PETITIONS AND CLAIMS: The owner of the information or personal data or their respective assignees may file a claim with **H.R y CIA**, in its capacity as data controller, whenever they consider that the information contained in a company database should be corrected, updated or deleted, or when they notice an alleged breach of any of the duties contained in this PTDP and in Law 1581 of 2012, which will be processed under the following rules:

Harvesting Tradition since 1976



1. 24.1. The claim must be filed in writing through the enabled channels and be addressed to **H.R y CIA** , identifying the owner of the data and personal information with full name, surname and identification number, must also contain a description of the facts on which the claim is based, the address at which the applicant(s) will receive notifications and must be accompanied by documentary evidence to be asserted.

2. 24.2. In the event that the complaint is received by a department, area or dependency of the company that lacks competence to process and resolve it, it shall be transferred to the corresponding department, area or dependency within a term not exceeding two (2) business days and shall inform the applicant of the situation.

3. 24.3. When the written claim does not have the minimum elements described in the first paragraph of this article, **H.R y CIA** , through its employees and collaborators, shall require the applicant within five (5) working days following the filing of the claim to correct the faults or provide the missing documents.

4. 24.4. **H.R y CIA** will respond to the request or claim within the term established in paragraph F of this PTDP, in accordance with the provisions of Article 15 of Law 1581 of 2012.

H. VALIDITY:

25. This PTDP of H.R y CIA is in force from October 1, 2016 and indefinitely, so its content binds the company while the contractual, commercial, labor or merely informative relationships with the holders of personal information and data remain in force. The above, without prejudice to the right of the holders to request the revocation of the authorization for the processing of their personal data and information.

In any case, and even when there is a request for revocation of authorization for treatment, H.R y CIA warns that in accordance with the provisions of paragraph D. of this PTDP, personal data will be retained when required for compliance with an obligation of a legal or contractual nature that has arisen between the company and the respective holder.

H.R y CIA reserves the right to make adjustments to the content of this PTDP when the processing activities and/or the purpose of the processing of personal data and information change, or when

Harvesting Tradition since 1976



regulatory changes in the matter justify it. In any case, such changes will be duly communicated to the holders through efficient communication mechanisms commonly used in the ordinary course of business or promotional relationships with them are held.

I. REGISTRATION OF DATABASES IN THE NATIONAL REGISTRY OF DATABASES - RNBD:

26. GENERAL CONSIDERATIONS OF THE RNBD: Under the terms of Article 2.2.2.26.1.3 of the Sole Regulatory Decree 1074 of 2015, **H.R y CIA** as a private law legal entity that acts as data controller and personal information, must register the databases containing such information in the National Database Registry, independently. The foregoing, in accordance with the terms and conditions of registration provided in Section 3 of Chapter 26 of the Sole Regulatory Decree 1074 of 2015, whose Article 2.2.2.26.3.2 provides that it shall be the Superintendence of Industry and Commerce who shall establish the procedure for registration of databases in the National Database Registry to be complied with by the data controllers, after validation of their identity, in accordance with the regulations issued by the aforementioned entity.

27. CONSULTATION OF THE RNBD: Subject to the provisions of Article 2.2.2.26.1.4 of the Sole Regulatory Decree 1074 of 2015, citizens may consult in the National Database Registry - RNBD - the minimum information provided in Article 2.2.2.26.1 of said decree, "in order to facilitate the exercise of their rights to know, update, rectify, delete the data and/or revoke the authorization."

MINIMUM INFORMATION OF THE RNBD: In accordance with the provisions of article 2.2.2.26.2.1 of the Sole Regulatory Decree 1074 of 2015, the minimum information to be contained in the National Database Registry - RNBD - is the following:

1. 28.1. Identification, location and contact details of the data controller of the database, in this case, **H.R y CIA** , including its name or company name and its tax identification number (NIT) for being a legal entity (article 2.2.2.26.2.2.2 of the Sole Regulatory Decree 1074 of 2015).

2. 28.2. Identification, location and contact details of the data controller(s) of the database, in this case, **H.R y CIA** , in its capacity as the party responsible for the processing of personal data and information, including its name or company name and its tax identification number (NIT) as a legal entity (article 2.2.2.26.2.3 of the Sole Regulatory Decree 1074 of 2015).

Harvesting Tradition since 1976



3. 28.3. Channels for holders to exercise their rights, i.e., those identified in Chapters F and G of this PTDP.

4. 28.4. Form of database processing, i.e., whether the database processing activities are carried out manually or automatically.

5. 28.5. The present PTDP.

In parallel, the last paragraph of Article 2.2.2.26.2.1 of the Sole Regulatory Decree 1074 of 2015 states that "[t]he Superintendency of Industry and Commerce, as personal data protection authority, may establish within the National Registry of Databases additional information to the minimum provided for in this article, in use of the powers attributed to it by Law 1581 of 2012 in paragraph h) of Article 21", this power of which it made use through External Circular No, 002 of November 3, 2015, including in numeral 2.1. of said chapter, as additional minimum information to be provided in the National Database Registry - RNBD - the following:

- Information stored in the database.
- Information security measures*.
- Origin of personal data.
- International transfer of personal data.
- International transmission of personal data.
- Assignment or national transfer of database.
- Reporting of news, differentiating between claims submitted by owners* and security incidents*, which must be reported within the terms and opportunities established for this purpose in items (i) and (ii) of paragraph (g) of article 2.1 above.

* By express legal provision, the information related to security measures, complaints filed by owners and incidents reported will not be available for public consultation.

FIRST PARAGRAPH: The scope of the additional information set forth above shall be that expressly described in Article 2.1 of Chapter Two of Title V of the Sole Circular of the Superintendence of Industry and Commerce, added by External Circular No. 002 of November 3, 2015.

29. PROCEDURE FOR REGISTRATION IN THE RNBD: Notwithstanding the schedule suggested by the Superintendence of Industry and Commerce in Article 2.2. of Chapter Two of Title V of the Sole

Harvesting Tradition since 1976



Circular of the Superintendence of Industry and Commerce, added by External Circular No 002 of November 3, 2015, **H.R y CIA** shall proceed to register its databases in the National Registry of Databases - RNBD.

The registration of the company's databases shall be carried out in accordance with the instructions contained in the "User's Manual of the National Registry of Databases -RNBD-", published on the website of the Superintendence of Industry and Commerce.

PARAGRAPH ONE: As provided in Decree 1759 of November 8, 2016□ Article 2.2.2.2.26.3.1.

Deadline for registration. The registration of the databases in the National Registry of Databases shall be carried out within the following deadlines: a) The Data Controllers, legal persons of a private nature and mixed economy companies registered in the chambers of commerce of the country, shall make the referred registration no later than thirty (30) June 2017, in accordance with the instructions issued for that purpose by the Superintendence of Industry and Commerce."

30. UPDATE OF THE INFORMATION CONTAINED IN THE RNBD: In accordance with the provisions of Article 2.3 of Chapter Two of Title V of the Sole Circular of the Superintendence of Industry and Commerce, added by External Circular No 002 of November 3, 2015, **H.R y CIA** shall update the information contained in the RNBD, as follows:

30.1. Within the first ten (10) working days of each month, when substantial changes are made to the information registered.

2. 30.2. Annually, between January two (2) and March thirty-first (31), beginning in 2018.

3. 30.3. Within the first fifteen (15) working days of the months of February and August of each year, as of its registration, with respect to the information related to the claims filed by the holders referred to in numeral (i) of literal g) of article 2.1 of the aforementioned rule, with the first report to be made in the first semester of 2017, with the information corresponding to the second semester of 2016.

FIRST PARAGRAPH: For the purposes of item (i) above, substantial changes shall be understood as those described in the second paragraph of Article 2.3 of Chapter Two of Title V of the Sole

Harvesting Tradition since 1976



Circular of the Superintendence of Industry and Commerce, added by External Circular No. 002 of November 3, 2015.

HUGO RESTREPO Y CIA S.A.

NIT. 830052685-9

Harvesting Tradition since 1976