

INTERNAL MANUAL OF POLICIES AND PROCEDURES FOR DATABASE PROTECTION

1. GENERAL PROVISIONS

1.1 Applicable legislation

This manual takes into account the provisions contained in articles 15 and 20 of the Political Constitution and Law 1581 of 2012, “by which general provisions are dictated for the protection of personal data.”

1.2 Scope of application:

This manual applies to the processing of personal data that may be collected and/or handled by the company LINGUA VIVA TRADUCTORES SAS in connection with the execution of commercial contracts in pursuit of its corporate purpose and/or employment contracts.

1.3 Databases:

The policies and procedures contained in this manual apply to the databases managed by the company whose period of validity will be counted from the date the data is authorized to be used on a permanent basis for accounting purposes and for consulting payroll, providers, or clients.

1.4 Purpose:

This manual complies with the provisions of Law 1581 of 2012, which regulates the duties of those responsible for processing personal data, including the adoption of an internal manual of policies and procedures to ensure proper compliance with the law and, in particular, to address queries and complaints.

It also aims to regulate the procedures followed by LINGUA VIVA TRADUCTORES SAS for collecting, handling, and processing personal data in order to guarantee and protect the fundamental right of habeas data within the framework of the provisions of the same law.

1.5 Definitions:

– **Authorization:** Prior, express, and informed consent of the owner to process his personal data.

- Databases:** Organized set of personal data that is processed.
- Personal data:** Any information linked or likely to be associated to one or more specific or ascertainable individuals or legal entities.
- Sensitive data:** Information which may affect the owner's privacy or whose misuse may lead to discrimination. Example: racial or ethnic origin, political orientation, religious or philosophical convictions, membership to unions, social or human rights organizations, or those promoting the interest of any political party, data related to health, sexuality. The processing of sensitive data is prohibited by law, except when the owner has explicitly given his authorization, or when processing is necessary for the vital interest of the owner, or when it is necessary for the defense in legal proceedings, or has a historical, statistical, or scientific purpose.
- **Data processor:** individual or legal entity who processes personal data on behalf of the data controller.
- **Data controller:** Individual or legal entity who makes decisions regarding the database and/or data processing.
- Owner:** Individual or legal entity whose personal data is processed.
- Processing:** Any operation or set of operations using personal data, such as collection, storage, use, circulation, or elimination.

1.6 Principles

The principles set out below are the parameters that will govern the processes of collection, use, and processing of personal data by LINGUA VIVA TRADUCTORES SAS:

- Freedom:** The use of personal data can only be carried out with the prior, express, and informed consent of the owner. Personal data may not be obtained or disclosed without prior authorization or in the absence of a legal or judicial order replacing consent.
- Veracity or quality:** The information must be true, complete, exact, updated, verifiable, and understandable. The use of partial, incomplete, fractioned, or misleading data is prohibited.

- **Transparency:** The owner must be guaranteed the right to obtain from LINGUA VIVA TRADUCTORES SAS, at any time and without restriction, information about the existence of data concerning him.

- **Restricted access:** Personal data, with the exception of public information, may not be made available in any means of dissemination or mass communication unless access is technically controllable in order to provide restricted knowledge to the owners.

- **Security:** The information must be protected by means of the use of technical, human and/or administrative measures that are necessary to avoid the adulteration, loss, consultation, or unauthorized access of the data handled by LINGUA VIVA TRADUCTORES SAS.

- **Confidentiality:** All persons involved in the processing of personal data are obliged to keep the information confidential.

2 AUTHORIZATION

2.1 Authorization

For the collection, storage, use, and circulation of personal data required by LINGUA VIVA TRADUCTORES SAS, it is necessary to have the data owner's prior, free, express, and informed consent. LINGUA VIVA TRADUCTORES SAS, as the data controller, has the necessary mechanisms to obtain the owners' authorization, guaranteeing that it can be verified.

2.2 Authorization collection mechanisms

Authorization can be granted by means of a physical or electronic document, or in any other format that can be consulted later. Authorization is issued by LINGUA VIVA TRADUCTORES SAS and made available to the owner prior to the processing of his or her personal data, as established by Law 1581 of 2012.

2.3 Proof of authorization

LINGUA VIVA TRADUCTORES SAS adopts the necessary measures to keep records of when and how the authorizations were obtained from the owners of personal data for its processing.

2.4 Privacy notice

The Privacy Notice is the physical or electronic document, or in any other format, that is made available to the owner for the processing of his/her personal data. Through this document, the owner is informed of the existence of the applicable data processing policies, how to access them, and what kind of processing is intended for the personal data.

2.5 Privacy notice content

The privacy notice contains the following information:

- Contact details of the data controller.
- The type of processing that will be done with the data.
- Mechanisms for accessing or consulting the policy of procedures for processing the database.

3 RIGHTS AND RESPONSIBILITIES

3.1 Rights of the owners

In accordance with the provisions of Article 8 of Law 1581 of 2012, the owner of the personal data has the following rights:

- See, update, and rectify their personal data before LINGUA VIVA TRADUCTORES SAS, in its capacity as data controller.
- Request proof of the authorization granted to LINGUA VIVA TRADUCTORES SAS, in its capacity as data controller.
- Be informed by LINGUA VIVA TRADUCTORES SAS, upon request, what the personal data has been used for.
- Submit complaints for violations of the provisions of Law 1581 of 2012 to the Superintendency of Industry and Commerce once the consultation or complaint has been exhausted before the data controller.

-Revoke the authorization and/or request the elimination of the data when the processing does not respect the constitutional and legal principles, rights, and guarantees.

-Access the personal data subject to processing, free of charge.

3.2 Duties of LINGUA VIVA TRADUCTORES SAS

LINGUA VIVA TRADUCTORES SAS is aware, at all times, that personal data is the property of the owners and that only the owners can make decisions regarding this information. It will use the data only for those purposes for which it is duly empowered, respecting Law 1581 of 2012 on the protection of personal data in all cases, as well as commit to permanently fulfilling the following duties in relation to the processing of personal data:

-Guarantee the owner, at all times, the full and effective exercise of the right of habeas data.

-Keep the information under the necessary security conditions to prevent its adulteration, loss, consultation, and unauthorized or fraudulent use or access.

-Update, rectify, or eliminate the data in due time, in the terms foreseen in articles 14 and 15 of Law 1581 of 2012.

-Process the consultations and claims formulated by the owners in the terms indicated in article 14 of Law 1581 of 2012.

-Insert the caption "information in judicial decision" in the database once notified by the competent authority about judicial processes related to the quality or details of personal data.

-Refrain from circulating information that is being disputed by the owner and has been blocked by the Superintendency of Industry and Commerce.

-Only allow access to those who are allowed to have access to the information.

-Inform the Superintendency of Industry and Commerce when there are violations to the security codes and risks involved in administering information to the owners.

-Comply with the instructions and requirements given by the Superintendency of Industry and Commerce.

4 CONSULTATION AND COMPLAINTS PROCEDURE

4.1 Access rights:

The power of disposal or decision that the owner has over the information concerning him gives him the right to access and know if his personal information is being processed. Thus, LINGUA VIVA TRADUCTORES SAS must guarantee the owner their right of access in three ways: the owner may know the effective existence of the processing of their personal data.

- a. The owner may have access to his personal data held by the data controller.
- b. The owner has the right to know the essential circumstances of processing, which leads to the fulfillment of LINGUA VIVA TRADUCTORES SAS's duty to inform the owner about the type of personal data processed as well as every purpose of the processing.

4.2 Consultations:

In accordance with the provisions of Article 14 of Law 1581 of 2012, the owners may consult their personal information stored in any database. Consequently, LINGUA VIVA TRADUCTORES SAS guarantees the right to consultation, providing the owners with all the information contained in the individual register or that is linked to the owner's identification. LINGUA VIVA TRADUCTORES SAS guarantees handling requests to consult personal information as follows:

- Enable electronic or other means of communication as deemed appropriate.
- Establish forms, systems, and other simplified methods.
- Use the customer service or complaint services that are in operation.

Regardless of the mechanism used to attend to consultation requests, they will be answered within a maximum of ten (10) working days from the date received. When it is not possible to respond within this term, the interested party will be informed before the expiration, expressing the reasons for the delay and indicating the date on which the query will be answered, which may not exceed five (5) working days after the expiry of the first term.

4.3 Claims:

In accordance with the provisions of article 15 of Law 1581 of 2012, the owner may file a claim with the data controller if he considers that the information contained in a database should be corrected, updated, or deleted, or when they notice the alleged breach of any of the duties contained in Law 1581 of 2012 or this manual. The claim will be processed under the following rules:

1. The claim may be submitted by the owner, taking into account the provisions of article 15 of Law 1581 of 2012, in the form or forms provided by the controller. If the claim received is incomplete or without the owner's identification, the description of the facts that give rise to the claim, the address, and accompanying documents to assert the claim, the interested party will be required to correct the mistakes within five (5) days from the date received.

If the applicant has not submitted the required information two (2) months from the date of the request, it will be understood that the claim has been withdrawn. If, for any reason, a claim is received that should not be directed to LINGUA VIVA TRADUCTORES SAS, it will be forwarded, to the extent possible, to the appropriate party within a maximum period of two (2) working days, and the interested party will be informed of the situation.

2. Once the complete claim has been received, a caption will be included in the database maintained by the controller that says "claim in process" and the reason for it, in a term no longer than two (2) working days. Said caption shall be maintained until the claim is closed.
3. The maximum term to respond to a claim will be fifteen (15) working days from the day after it was received. When it is not possible to address it within said term, the interested party will be informed before the expiration of said term of the reasons for the delay and the date on which the claim will be answered, which in no case may exceed eight (8) working days following the expiration of the first term.

4.4 Procedure for filing a claim

At any time and free of charge, the owner may request LINGUA VIVA TRADUCTORES SAS rectify, update, or eliminate their personal information, after validating their identity.

The rights to rectify, update, or eliminate may only be exercised by the owner upon verifying his identity, or his representative, upon verifying his representation.

When the request is made by a person other than the owner and it cannot be proven that the person is acting on behalf of the owner, it will be deemed not filed.

Requests for rectification, updating, or elimination must be submitted through the means enabled by LINGUA VIVA TRADUCTORES SAS as indicated in the privacy notice and must contain, at least, the following information:

- The name and address of the owner or any other means to receive the response.
- Documents proving the identity or identity of the representative.
- A clear and precise description of the personal information the owner seeks in order to exercise any of his rights.
- If necessary, other elements or documents that facilitate the location of the personal information. LINGUA VIVA TRADUCTORES SAS has the obligation to rectify and update, at the request of the owner, any of the owner's information that is incomplete or inaccurate, in conformance with the procedure and the indicated terms. The following will be taken into account:

In the requests for rectification and updating of personal information, the owner must indicate the corrections to be made and attach documentation supporting the request. LINGUA VIVA TRADUCTORES SAS is free to set up mechanisms to facilitate the exercise of this right, provided they benefit the owner.

LINGUA VIVA TRADUCTORES SAS may establish forms, systems, and other simplified methods, which must be informed by means of the privacy notice and which will be made available to the interested parties. For these purposes, LINGUA VIVA TRADUCTORES SAS may use the same customer care or service mechanisms they have in place, as long as the response times do not exceed those indicated by Article 15 of Law 1581 of 2012.

The owner has the right, at all times, to request LINGUA VIVA TRADUCTORES SAS to eliminate their personal information when:

- The owner considers that it is not being processed in accordance with the principles, duties, and obligations provided for in Law 1581 of 2012.

- It is no longer necessary or relevant for the purpose for which it was collected.
- The period necessary to fulfill the purposes for which it was collected has expired.

This implies the total or partial elimination of personal information as requested by the owner in the records, archives, databases, or processes carried out by LINGUA VIVA TRADUCTORES SAS. It is important that this owner's right is not absolute and the data controller can deny the exercise of this right when the holder has a legal or contractual duty to remain in the database, the elimination hinders judicial or administrative actions related to tax obligations, the investigation and prosecution of crimes or the updating of administrative sanctions and if the information is necessary to protect the interests legally administered by the owner.

If the cancelation of the data is appropriate, LINGUA VIVA TRADUCTORES SAS must eliminate the data in an operational manner that does not allow the recovery of this information.

4.5 Revocation of authorization

The owners of the personal information may revoke their consent to the processing of their personal information at any time, provided that this is not prevented by a legal or contractual provision. For this, LINGUA VIVA TRADUCTORES SAS must establish simple and free mechanisms that allow the owner to revoke his consent, at least by the same means by which he gave it. It should be noted that there are two ways in which revocation of consent can be given. The first may be for all the purposes agreed upon, i.e. that LINGUA VIVA TRADUCTORES SAS must stop processing the owner's information completely; the second may be for specific types of processing, such as for advertising purposes or for market research. With the second modality, the partial revocation of consent, other processing purposes that the data controller can carry out and which the owner agrees to, in accordance with the granted authorization. Therefore, it will be necessary that the owner indicate whether the revocation is complete or partial at the moment the revocation request is made.

In the second case, the treatment the owner does not agree with must be indicated. There will be cases in which the consent, due to its necessary nature in the relationship between the owner and the person responsible for

the fulfillment of a contract, cannot be revoked due to legal provisions. The mechanisms or procedures established by LINGUA VIVA TRADUCTORES SAS to deal with requests to revoke consent may not exceed the time limits for dealing with claims as set out in article 15 of Law 1581 of 2012.