MANUAL OF POLICIES AND PROCEDURES FOR THE TREATMENT OF PERSONAL DATA.

0. 1. OBJECTIVE

The purpose of this document is to establish the policies and procedures governing the processing of personal data contained in the databases for which CHAPMAN WILCHES SAS acts as the Data Controller and/or Processor. It also delineates the rights of data subjects, the commitments undertaken by CHAPMAN WILCHES SAS toward the data subjects in its capacity as Data Controller or Processor, and the procedures implemented to enable data subjects to exercise their rights effectively.

2. SCOPE

This document is applicable to the processing of personal data collected by CHAPMAN WILCHES SAS. Depending on the nature and purpose of the data, CHAPMAN WILCHES SAS may operate as the Data Controller and/or Processor of the personal data that constitute the respective databases.

CHAPMAN WILCHES SAS is domiciled in Barranquilla, Colombia, at Cl. 77b ## 57 – 103, 21st floor, and can be contacted via email at info@chw.com.co.

3. DEFINITIONS

Privacy Notice: A verbal or written communication option provided by law to inform data subjects about the existence of and means to access the data processing policies, as well as the purpose for which their data is collected and used.

Authorization: The consent given by an individual allowing companies or individuals responsible for data processing to utilize their personal data.

Database: An organized collection of personal data subject to processing.

Personal Data: Any information related to or that can be associated with a specific individual, such as their name or identification number, or any data that can identify them, including physical characteristics.

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Private Data: Data that, by its intimate or confidential nature, is relevant only to the data subject. For example, personal preferences or tastes qualify as private data.

Public Data: A type of personal data that is considered public, which includes, but is not limited to, information regarding an individual's marital status, profession, trade, and status as a merchant or public servant. Public data may be found in public records, documents, official gazettes and bulletins, and judicial decisions that are not subject to confidentiality.

Semiprivate Data: Data that is neither intimate, confidential, nor public and whose knowledge or disclosure may interest not only the data subject but also certain sectors or society at large. Examples include financial and credit information related to commercial or service activities.

Sensitive Data: Data that may affect the privacy of the data subject or could lead to discrimination. This includes data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, union membership, or affiliation with social organizations, as well as data related to health, sexual life, and biometric data.

Biometric Data: Data related to the physical, physiological, or behavioral characteristics of a person that can facilitate their identification.

Processor: A natural or legal person who processes personal data based on a delegation from the Data Controller and who receives instructions regarding the management of that data.

Data Controller: A natural or legal person, whether public or private, that determines the purposes and means of processing personal data.

Data Subject: A natural person whose personal data is being processed.

Transfer: The act of the Data Controller or Processor sending personal data to another recipient, who then becomes responsible for processing that data.

Transmission: The processing of personal data that involves the communication of the data within or outside the territory of the Republic of Colombia for the purpose of conducting processing on behalf of the Data Controller.

Processing: Any operation or set of operations performed on personal data, including collection, storage, use, dissemination, or deletion.

Supplier: Any natural or legal person that provides goods and/or services to CHAPMAN WILCHES SAS under a contractual agreement.

Client: Any natural or legal person who acquires goods and/or services marketed or provided by CHAPMAN WILCHES SAS.

3. GENERAL CONDITIONS

For situations not governed by this Manual, the provisions of Laws 1581 of 2012 and 1266 of 2008, as well as Regulatory Decrees 1377 of 2013 and 1727 of 2009, and Decree 1074 of 2015, along with any complementary regulations, shall apply.

4. DEVELOPMENT

5.1 PRINCIPLES FOR THE PROCESSING OF PERSONAL DATA

For the proper processing of personal data contained in the Databases, as well as for the interpretation and implementation of these policies, the following principles shall be harmoniously and integrally observed:

5.1.1 PRINCIPLE OF LEGALITY

Throughout all stages and activities of information processing by CHAPMAN WILCHES SAS in its capacity as Data Controller and/or Processor or by any designated Processor, in addition to the provisions established in this policy, the rules described in Section 4, and all regulations that govern, supplement, modify, or repeal them shall be applied.

5.1.2 PRINCIPLE OF PURPOSE

The processing of Personal Data collected by CHAPMAN WILCHES SAS shall have a legitimate, specific, and informed purpose in accordance with the Political Constitution and the Law, which shall be communicated to the Data Subject.

5.1.3 PRINCIPLE OF FREEDOM
Processing shall only be carried out with the prior, explicit, and informed consent of the Data Subject. CHAPMAN WILCHES SAS shall not obtain or disclose personal data without prior authorization, or in the absence of a legal or judicial mandate that relieves the need for consent.

5.1.4 PRINCIPLE OF TRUTHFULNESS OR QUALITY
CHAPMAN WILCHES SAS is committed to the Data Subjects whose information constitutes its databases, ensuring that such data is truthful, complete, accurate, updated, verifiable, and comprehensible. Consequently, it shall refrain from processing partial, incomplete, fragmented data, or data that may lead to error.

5.1.5 PRINCIPLE OF TRANSPARENCY
CHAPMAN WILCHES SAS guarantees the Data Subject's right to obtain from CHAPMAN WILCHES SAS, at any time and without restrictions, information regarding the existence of data concerning them.

5.1.6 PRINCIPLE OF ACCESS AND RESTRICTED CIRCULATION
Access to the information that constitutes the Database is restricted to specialized personnel who have been properly trained to handle such information. CHAPMAN WILCHES SAS does not publish personal information subject to processing on the Internet or other mass communication or dissemination media, unless access is technically controllable to provide restricted knowledge only to the Data Subjects or third parties authorized in accordance with the law.

5.1.7 PRINCIPLE OF SECURITY
CHAPMAN WILCHES SAS has adopted technical, human, and administrative measures appropriate to the nature of the data being processed, to ensure the security of the records and to prevent them from being tampered with, lost, consulted, used, or accessed by unauthorized personnel or through fraudulent means.

5.1.8 PRINCIPLE OF CONFIDENTIALITY

Your access to and use of this site is subject to applicable laws and regulations, as well as the terms and conditions set forth in this document. By accessing and reviewing this website, you accept these terms and conditions without any limitation or condition, and you acknowledge that they replace and render void any prior agreement regarding the use of this Site between you and CHAPMAN WILCHES SAS.

5. PROCESSING OF PERSONAL DATA

6.1 DATABASE

CHAPMAN WILCHES SAS, acting as the Data Controller and/or Processor of Personal Data, for the proper development of its corporate purpose and to strengthen its relationships with third parties, collects, stores, uses, circulates, and deletes Personal Data related to natural persons with whom it has or has had a relationship, including but not limited to employees and their families, suppliers, and clients.

6.2 PURPOSE

By way of example and without prejudice to the possibility that CHAPMAN WILCHES SAS may collect and constitute Databases other than those mentioned below during the course of its activities, Personal Data is processed by CHAPMAN WILCHES SAS for all or some of the following purposes:

6.2.1 DATABASE OF EMPLOYEES

CHAPMAN WILCHES SAS collects personal data from potential candidates and its own employees and their families, as well as from candidates and employees of third parties when acting as the Processor of such data, which facilitates, among other things, the processes of selection, hiring, and promotion, as well as the execution of certain contractual obligations, with the following purposes:

a) Establishing communication channels with the Data Subjects.

b) Conducting selection processes, promotions, employee well-being, payroll, performance evaluations, induction, training, health and safety in the workplace, and environmental matters.

c) Fulfilling obligations arising from current employment contracts, directly or through third parties.

d) Fulfilling obligations related to the execution of the corporate purpose of CHAPMAN WILCHES SAS or of the Data Controller, when CHAPMAN WILCHES SAS acts as the Processor, both within and outside the national territory.

e) Implementing training and development programs for employees.

f) Conducting performance evaluations of employees.

g) Adopting control and security measures over the facilities.

h) Ensuring security and/or providing evidence before a judicial or administrative authority when data is obtained through recordings or provided by the Data Subject to the security company for entry or stay in the facilities of CHAPMAN WILCHES SAS.

i) Tax purposes, including sending information to tax authorities.

j) Transmitting or partially transferring data to the different areas of CHAPMAN WILCHES SAS, as well as to contractors, shareholders, subsidiaries, and associates of CHAPMAN WILCHES SAS when required for commercial, financial, administrative, and operational purposes, including Sensitive Data, in accordance with the terms and conditions of this Manual, as applicable, primarily to facilitate operational development, including but not limited to reports to control and oversight authorities and other uses for the aforementioned purposes.

6.2.2 SUPPLIER DATABASES

CHAPMAN WILCHES SAS collects personal data from (i) suppliers, (ii) potential suppliers, (iii) employees or contact persons of suppliers, (iv) employees or contact persons of potential suppliers of its own and third parties when acting as Data Processor of such data, which facilitate, among other things, the contracting processes and the execution

and verification of compliance with various contractual obligations, with the following purposes:

a) Establishment of communication channels with the holders of personal data related to the activities established in the previous paragraph.
b) Evaluation of the quality of the products and services received.
c) Compliance with obligations related to the execution of the corporate purpose of CHAPMAN WILCHES SAS or of the Data Controller, when CHAPMAN WILCHES SAS acts in this regard as Data Processor.
d) Adoption of control and security measures in the facilities under its responsibility.
f) Analysis for the establishment and/or maintenance of contractual relationships.
g) Analysis for the evaluation of risks derived from existing contractual relationships.
h) Analysis for conducting market studies or commercial or statistical research.
i) For security and/or proof before a judicial or administrative authority when the data is obtained through recordings or provided by the Holder to the security company for entry or stay in CHAPMAN WILCHES SAS facilities.
j) Tax purposes, including sending information to tax authorities.

k) Total or partial transmission or transfer to the different areas of CHAPMAN WILCHES SAS, as well as to contractors, shareholders, subsidiaries, and associated companies of CHAPMAN WILCHES SAS when required for commercial, financial, administrative, and operational purposes, including Sensitive Data, in accordance with the terms and conditions of this Manual, as applicable, mainly to enable the operation's development, including but not limited to reports to control and surveillance authorities and other uses for the mentioned purposes.

6.2.3 CLIENT DATABASES

CHAPMAN WILCHES SAS collects personal data from current, previous, and potential clients, as well as from some contact persons of current, previous, and potential clients, both its own and third parties when acting as Data Processor of such data, with the following purposes:

a) Establishment of communication channels with the holders of personal data.
b) Evaluation of the quality of the services provided.
c) Compliance with obligations related to the execution of the corporate purpose of CHAPMAN WILCHES SAS or of the Data Controller, when CHAPMAN WILCHES SAS acts in this regard as Data Processor.

d) Invitation to participate in training and capacity-building programs for clients.
e) For security and/or proof before a judicial or administrative authority when the data is obtained through recordings or provided by the Holder to the security company for entry or stay in CHAPMAN WILCHES SAS facilities.
f) Tax purposes, including sending information to tax authorities.
g) Total or partial transmission or transfer to the different areas of CHAPMAN WILCHES SAS, as well as to contractors, shareholders, subsidiaries, and associated companies of CHAPMAN WILCHES SAS when required for commercial, financial, administrative, and operational purposes, including Sensitive Data, in accordance with the terms and conditions of this Manual, as applicable, mainly to enable the operation's development, including but not limited to reports to control and surveillance authorities and other uses for the mentioned purposes.

6.2.5 CORRESPONDENTS DATABASES

CHAPMAN WILCHES SAS collects personal data from current, previous, and potential correspondents, both its own and third parties when acting as Data Processor of such data, with the following purposes:
a) Establishment of communication channels with the holders of personal data.
b) Evaluation of the quality of the services provided.
c) Compliance with obligations related to the execution of the corporate purpose of CHAPMAN WILCHES SAS or of the Data Controller, when CHAPMAN WILCHES SAS acts in this regard as Data Processor.
d) Invitation to participate in training and capacity-building programs for correspondents.
e) For security and/or proof before a judicial or administrative authority when the data is obtained through recordings or provided by the Holder to the security company for entry or stay in CHAPMAN WILCHES SAS facilities.
f) Tax purposes, including sending information to tax authorities.
g) Total or partial transmission or transfer to the different areas of CHAPMAN WILCHES SAS, as well as to contractors, shareholders, subsidiaries, and associated companies of CHAPMAN WILCHES SAS when required for commercial, financial, administrative, and operational purposes, including Sensitive Data, in accordance with the terms and conditions of this Manual, as applicable, mainly to enable the operation's development, including but not limited to reports to control and surveillance authorities and other uses for the mentioned purposes.

6.3 AUTHORIZATION

The information processing activities regulated by this policy will be executed exclusively

on personal data whose holders have previously issued their authorization in an express and informed manner.
Notwithstanding the above, CHAPMAN WILCHES SAS reserves the right to carry out processing activities on information whose authorization is not required under the legal provisions regulating the matter, in which case the commitments of CHAPMAN WILCHES SAS to the holders established in this policy remain in force.
For the relevant purposes, CHAPMAN WILCHES SAS may obtain the data subject to processing by collecting it directly, for which it must have the respective authorization, or from databases provided by third parties who have previously obtained authorization from the Holders.

6.4 FORM AND MECHANISMS TO GRANT AUTHORIZATION

Authorization may be in a physical document, electronic, or any other format that allows for subsequent consultation, or through a suitable technical or technological mechanism through which it can be unequivocally concluded that if the Holder had not carried out a specific action, the data would never have been collected and stored in the database. The format for authorization will be prepared by CHAPMAN WILCHES SAS and will be made available to the Holder prior to the processing of their personal data, in accordance with what is established by Law 1581 of 2012 and Decree 1377 of 2013 and other complementary norms.
With the consented authorization procedure, it is guaranteed that the Holder of personal data has been informed that their personal information will be collected and used for determined and known purposes, and the right that assists them to request access, update, rectify, and delete their personal data at any time, through the mechanisms made available by CHAPMAN WILCHES SAS. The above is to ensure that the Holder makes informed decisions regarding their personal data and controls the use of their personal information.
At the time of requesting the Holder's authorization, CHAPMAN WILCHES SAS will inform them clearly and expressly:
a) The Processing of the data and its purpose
b) The data that will be collected
c) The rights that assist them as holders
d) If they are sensitive data, the right to decide whether or not to provide the requested information.
e) The identification, physical and/or electronic address, and phone number of the data processor.

6.5 PROOF OF AUTHORIZATION

CHAPMAN WILCHES SAS will adopt the necessary measures to maintain records or suitable technical or technological mechanisms of when and how authorization was obtained from the holders of personal data for its processing.

6.6 PRIVACY NOTICE

The Privacy Notice is the physical, electronic, or any other format document made available to the Data Subject for the processing of their personal data, no later than at the time of collection of the personal data. Through this document, the Data Subject is informed about the existence of the information processing policies that will apply to them, how to access them, and the characteristics of the processing intended for their personal data.

6.7 MINIMUM CONTENT OF THE PRIVACY NOTICE

The Privacy Notice must, at a minimum, contain the following information:

a) The identity, address, and contact details of the Data Controller;
b) The type of processing to which the data will be subjected and its purpose;
c) The rights that the Data Subject has;
d) The general mechanisms established by CHAPMAN WILCHES SAS for the Data Subject to be aware of the information processing policy and any substantial changes that occur in it or in the corresponding Privacy Notice. In all cases, it must inform the Data Subject how to access or consult the information processing policy.

Notwithstanding the above, when sensitive personal data is collected, the privacy notice will expressly indicate the optional nature of the response to questions regarding this type of data.

6.8 PRIVACY NOTICE AND CHAPMAN WILCHES SAS INFORMATION PROCESSING POLICIES

CHAPMAN WILCHES SAS will retain the model of the privacy notice transmitted to the Data Subjects as long as personal data processing is carried out and the obligations derived from it last. For the storage of the model, CHAPMAN WILCHES SAS may use computer, electronic, or any other technology.

6.9 PROCESSING OF PERSONAL DATA OF CHILDREN AND ADOLESCENTS

The processing of personal data of children and adolescents is prohibited, except when it concerns publicly available data, in accordance with the provisions of Article 7 of Law 1581 of 2012, and when such processing meets the following parameters and requirements:
a) It responds to and respects the best interests of children and adolescents.
b) It ensures the respect for their fundamental rights.
Once the above requirements are met, the legal representative of the child or adolescent will grant authorization after exercising the minor's right to be heard, an opinion that will be valued considering the minor's maturity, autonomy, and ability to understand the matter.

CHAPMAN WILCHES SAS, as the Responsible and in charge of the processing of personal data of children and adolescents, will ensure the appropriate use of such data. To this end, it will apply the principles and obligations established in Law 1581 of 2012, Decree 1377 of 2013, and other complementary regulations.

6. RIGHTS AND DUTIES

7.1 RIGHTS OF THE DATA SUBJECTS

The Data Subject has the right to:
a) Know, update, and rectify their personal data before the Data Controllers or Processors. This right may be exercised, among others, regarding partial, inaccurate, incomplete, fragmented data, those that induce error, or those whose processing is expressly prohibited or has not been authorized;
b) Request proof of the authorization granted to the Data Controller, unless it is expressly exempted as a requirement for processing or as established by applicable regulations;
c) Be informed by the Data Controller or Processor, upon request, about the use given to their personal data;
d) Submit complaints to the Superintendence of Industry and Commerce for violations of the Data Protection Law or those that modify, add to, or complement it;
e) Revoke the authorization and/or request the deletion of the data when: (i) The processing does not respect the principles, rights, and constitutional and legal guarantees, as long as the Superintendence of Industry and Commerce has determined that the Data Controller or Processor has engaged in conduct contrary to the legal framework; and/or (ii) The Data Subject voluntarily requests it, unless there is a legal or contractual obligation that imposes the duty to remain in the database;

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When acting as the Data Controller, CHAPMAN WILCHES SAS will ensure compliance with:
a) Guarantee the Data Subject, at all times, the full and effective exercise of the habeas data right;
b) Request authorization from the Data Subject;
c) Keep a copy of the authorization granted by the Data Subject;
d) Provide a copy of the authorization when the Data Subject or authorized person requests it;
e) Inform the Data Subject about the purpose of data collection and their rights concerning their authorization;
f) Keep the information under the necessary security conditions to prevent its alteration, loss, consultation, unauthorized or fraudulent use or access;
g) Ensure that the information provided to the Processor is truthful, complete, accurate, updated, verifiable, and understandable;
h) Update the information by promptly communicating to the Processor any updates regarding the Data previously provided and adopt measures to keep the information supplied to them updated;
i) Rectify the information when incorrect and communicate the relevant details to the Processor;
j) Supply the Processor only with data whose processing has been previously authorized;
k) Require the Processor to respect the security and privacy conditions of the Data Subject's information;
l) Process the queries and claims made;
m) Inform the Processor when certain information is under discussion by the Data Subject, once the claim has been filed and the respective procedure has not concluded;
n) Inform the Data Subject, upon request, about the use given to their data;
o) Inform the Superintendence of Industry and Commerce when violations of security codes occur and risks exist in the administration of the Data Subjects' information;
p) Comply with the instructions and requirements of the Superintendence of Industry and Commerce.

PARAGRAPH: CHAPMAN WILCHES SAS reserves the right to delegate certain processing activities to a third party, so that they are carried out on its behalf, in which case the latter will observe the duties established in Section 17 of this policy.

7.3 DUTIES OF CHAPMAN WILCHES SAS WHEN ACTING AS THE PROCESSOR

When CHAPMAN WILCHES SAS acts as the Processor, it will ensure compliance with:

a) Guarantee the Data Subject, at all times, the full and effective exercise of the habeas data right;
b) Keep the information under the necessary security conditions to prevent its alteration, loss, consultation, unauthorized or fraudulent use or access;
c) Timely update, rectify, or delete the data;
d) Update the information reported by Data Controllers within five (5) business days from its receipt;
e) Process the queries and claims made by Data Subjects;
f) Have an internal manual of policies and procedures to ensure compliance with the Data Protection Law and, in particular, for the attention of queries and claims from Data Subjects;
g) Record in the database the legend "claim in process," when applicable;
h) Insert in the database the legend "information in judicial discussion" once notified by the competent authority regarding judicial proceedings related to the quality of the personal data;
i) Refrain from circulating information that is being disputed by the Data Subject and whose blocking has been ordered by the Superintendence of Industry and Commerce;
j) Allow access to the information only to those authorized to access it;
k) Inform the Superintendence of Industry and Commerce when violations of security codes occur and risks exist in the administration of the Data Subjects' information;
l) Comply with the instructions and requirements given by the Superintendence of Industry and Commerce.

7. SENSITIVE PERSONAL DATA AND MINORS

8.1 PROCESSING OF SENSITIVE PERSONAL DATA
CHAPMAN WILCHES SAS recognizes that certain data subjected to processing may be classified as sensitive; therefore, CHAPMAN WILCHES SAS has adopted measures so that when the data subjected to processing falls within those legally defined as sensitive:

Compliance with the principles governing the processing of personal information, established in Section 5, is reinforced.

No activity is conditioned on the provision of sensitive personal data.
Express, informed, and optional authorization from the Data Subjects is obtained before carrying out processing activities.

8.2 PROCESSING OF MINOR'S DATA

As a general rule, in the execution of any personal data processing activity, CHAPMAN WILCHES SAS will refrain from handling data whose holder is a minor, in accordance with the provisions of Article 7 of Law 1581 of 2012. Exceptionally, CHAPMAN WILCHES SAS will require the processing of data of minors. When this occurs, CHAPMAN WILCHES SAS will subject the processing of such data to the following rules:

Respect for the best interests of the minor who is the data holder.
Respect for the fundamental rights of the minor who is the data holder.
Authorization issued by the legal representative of the minor who is the data holder.

8. ACCESS, QUERY, AND COMPLAINT PROCESS

9.1 PROCEDURE FOR ADDRESSING REQUESTS AND QUERIES RELATED TO PERSONAL DATA PROCESSING

Through this procedure, the Data Subject or an authorized person may submit requests and queries to:
a) Know the personal information of the Data Subject held by CHAPMAN WILCHES SAS
b) Request a copy of the authorization granted by the Data Subject to CHAPMAN WILCHES SAS for the processing of their Personal Data.

These queries can be made free of charge at least once each calendar month and whenever there are substantial modifications to the Information Processing Policies that motivate new queries.

For queries whose frequency is greater than once per calendar month, CHAPMAN WILCHES SAS may only charge the Owner the costs of shipping, reproduction and, where applicable, certification of documents. The reproduction costs may not be greater than the recovery costs of the corresponding material. The procedure for handling queries about the Owner's personal data is as follows: a) The Owner or whoever is authorized to do so may make inquiries to CHAPMAN WILCHES SAS about the Owner's personal

information through the following mechanisms: Line Telephone: 3195874 Request written at: Calle 77B No. 57-103. Green Towers Building. 21st floor, Barranquilla, Colombia. Email to the address: info@chw.com.co Website: https://chapmanwilches.com/es/contactenos/ in the Contact Us section. b) The query will be answered within a maximum period of ten (10) business days from the date of receipt thereof.

c) When it is not possible to answer the query within the term indicated above, CHAPMAN WILCHES SAS will inform the person concerned, stating the reasons and indicating the date on which your query will be addressed, no later than five (5) working days following the expiration of the first term. The aforementioned terms may vary in case laws or regulations are issued that establish lower terms, according to the nature of the Personal Data. 9. 2 PROCEDURE FOR ADDRESSING CLAIMS RELATED TO THE PROCESSING OF PERSONAL DATA Through this procedure the Data Subject or whoever is authorized may file claims to: a) Update, modify, rectify or delete the data of the Holder, b) Revoke the Authorization of the Holder for the Processing of Data c) File a claim when it considers that there is an alleged breach of the duties of CHAPMAN WILCHES SAS related to the Processing of Personal Data, in accordance with the provisions of these Policies or the Law on Protection of Personal Data and the rules that supplement or amend it. The Data Subject may revoke the authorization and request the deletion of his/her data when: (i) the constitutional and legal principles, rights and guarantees are not respected, provided that the Superintendence of Industry and Commerce has determined that in the Processing the Controller or Processor has incurred in conduct contrary to the law and (ii) by virtue of the free and voluntary request of the Data Subject, when there is no legal or contractual obligation that imposes on the Data Subject the duty to remain in the database. This is without prejudice to the rules that CHAPMAN WILCHES SAS must comply with regard to document retention. Consequently, CHAPMAN WILCHES SAS will delete the data or suspend its use where appropriate, respecting the rules on document retention that are applicable The procedure for handling complaints about the personal data of the Holder is as follows: a) The Holder or whoever is authorized to do so, may make claims to CHAPMAN WILCHES SAS when: (i) Consider that the Holder's information contained in a database should be subject to correction, updating or deletion, (ii) Notice the alleged breach of any of the duties contained in the Data Protection Act, or (iii) Revoke the authorization for the Processing of the Holder.

The interested party (The Holder or whoever is authorized to do so) may make the claim through the channels mentioned in paragraph 20 of this document. b) The claim of the

person concerned must contain: the identification of the Holder (names and surnames, type and number of identity document, address and contact telephone number and e-mail (optional), a description of the facts giving rise to the claim documents supporting your claim. If you do not have the above information, it is understood that the claim is not complete. c) If the claim is incomplete, CHAPMAN WILCHES SAS will ask the person concerned to correct the faults or submit the information or documentation required within five (5) days of receipt of the claim in CHAPMAN WILCHES SAS After two (2) months from the date of the requirement, without the applicant submitting the required information, it is understood that the claim has been withdrawn. d) In the event that the person receiving the claim is not competent to resolve it, he/she will transfer it to the appropriate person within a maximum term of two (2) business days and will inform the interested party of the situation. e) Once the complete claim has been received, a legend will be included in the database stating “claim in process” and the reason for the claim, within a term not exceeding two (2) business days. This legend must be maintained until the claim is decided. f) CHAPMAN WILCHES SAS will address the claim within a maximum period of fifteen (15) working days from the day following the date of receipt in CHAPMAN WILCHES SAS When it is not possible to address the claim within that period, the area (s) responsible for responding within CHAPMAN WILCHES SAS, inform (n) the person concerned the reasons for the delay and the date on which the claim will be addressed, which may not exceed eight (8) working days following the expiration of the first term.

9.3 LEGITIMACY They are entitled to exercise the rights set forth in paragraph 7 of this Manual and others recognized by law, the owner of the data, their successors and assigns and persons authorized by him or them; in the latter two cases, you must prove the quality whose recognition is requested, through appropriate mechanisms. 9.4 COMPETENCE CHAPMAN WILCHES SAS appoints the quality area to ensure the protection of personal data contained in the databases and to process requests and complaints from the owners to exercise their rights of access, consultation, rectification, updating, deletion and revocation referred to in Law 1581,

9. SECURITY MEASURES CHAPMAN WILCHES SAS will take the necessary technical, human and administrative measures to ensure the security of Personal Data processed, in order to prevent tampering, loss, consultation, use or unauthorized access or fraudulent means. 10. FINAL PROVISIONS 11.1 VALIDITY This policy is effective as of the date of its publication on October 1, 2022. Substantial changes in the processing policies that may

affect the content of the authorization will be timely communicated to the Data Holders through the website and by any other suitable and effective mechanism, before implementing the new policies. The validity of the database will be the reasonable and necessary time to fulfill the purposes of the treatment taking into account the provisions of Article 11 of Decree 1377 of 2013.

11. RECORDS
Not applicable.

12. ANNEXES
Not applicable.

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