

DATA PROCESSING POLICIES

GENERAL AND POSTULATED PRINCIPLES

SEICO TECHNOLOGY SAS 1) It respects the legal system and individual rights, which is why it adopts this Information Treatment Policy, which aims to establish the guidelines to guarantee the right to Habeas Data of those natural persons whose personal data is collected by SEICO TECHNOLOGY SAS at any time as a consequence of the fulfillment of its corporate purpose.

The information will be treated in accordance with the principles of freedom, legality, purpose, truthfulness, transparency, access and restricted circulation, security, confidentiality, proportionality, temporality and good faith, thus having adequate mechanisms to eliminate personal information when the owner of the same request it.

NORMATIVA APLICABLE

Las presentes políticas fueron elaboradas con base en las disposiciones normativas consignadas en el artículo 15 de la Constitución Política de Colombia, la Ley 1581 de 2012 y el Decreto Reglamentario 1377 de 2013.

AREA OF APPLICATION

La presente política se aplica a los datos personales recolectados en virtud de la operación de SEICO TECHNOLOGY S.A.S, que incluye el desarrollo de productos tecnológicos y la distribución de productos propios y de terceros.

DEFINITIONS

The following definitions are made in order to clarify the scope of this policy and regulatory regulations.

1. 1. Authorization: Prior, express and informed consent given by the owner to carry out the Processing of personal data.
2. 2. Privacy notice: Verbal or written communication generated by the person in charge and addressed to the owner for the processing of their personal data. It is informed in this about the existence of the information treatment policies that will be applicable to your information and the way in which you can access them.
3. 3. c) Database: Organized set of personal data that is subject to Treatment.
4. 4. d) Personal data: Any information linked or that may be associated with one or more specific or determinable natural persons.
5. 5. e) Public data: It is the data classified as such according to the mandates of the law or the Political Constitution and that which is not semi-private, private or sensitive. Those that can be obtained without any reservation are public.
6. 6. f) Private data: It is the data that due to its intimate or reserved nature is only relevant for the owner.
7. 7. g) Sensitive data: Sensitive data is understood to be those that affect the privacy of the Holder or whose improper use may generate discrimination, such as those that reveal racial or ethnic origin, political orientation, religious or philosophical convictions, membership of 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 life and biometric data.
8. h) Treatment: Any action on personal data such as collection, storage or use.
9. i) Responsible for the Treatment: Natural or legal person, public or private, that on its own account or in association with others carries out the processing of personal data.
10. j) Responsible for the Treatment Natural or legal person, public or private, that on its own account or in association with others, makes decisions regarding personal databases.

11. k) Owner: Natural person whose personal data is subject to treatment.

TREATMENT TO WHICH THE PERSONAL DATA WILL BE SUBMITTED

Within the development of its corporate purpose, SEICO TECHNOLOGY S.A.S. will give a responsible treatment of the personal data that comes to be collected by the society. Said treatment will depend on the purpose for which the different personal data have been provided, which will depend on the nature of the relationship by virtue of which the owner has linked with SEICO TECHNOLOGY S.A.S., (Commercial, Labor or other). Based on the foregoing, the personal data of the holders will be collected, stored, used and / or deleted, serving any of the following purposes:

Granting and management of permits, licenses and authorizations; Administrative procedures; Customer loyalty; Management of sanctions, warnings, calls for attention, exclusions; Accounting, fiscal and administrative management of clients, collections and payments, billing, suppliers; make history of commercial relationships; development of advertising and commercial prospecting; opinion polls; own advertising; Market Segmentation; distance selling; time control; Payroll, personnel management; temporary work; payment of social benefits; and promotion, employment management and selection of personnel personnel.

The above purposes will be subject to modification according to the business dynamics presented by SEICO TECHNOLOGY S.A.S in the development of its corporate purpose.

In any case, the purposes of the processing of personal data will be the material limit for it, so SEICO TECHNOLOGY S.A.S will not use the personal data of the owner for purposes other than those stated, unless the owner expressly authorizes it.

Likewise, SEICO TECHNOLOGY S.A.S undertakes to inform the owner, as soon as possible, of any modification regarding the treatment to which their personal data is subject. The foregoing in order that he can exercise the rights that have been recognized from the legal plane and within this policy.

In any case, it must be taken into account that the processing of personal data will only be done for the time that is strictly necessary for the fulfillment of the purpose for which the information was provided. SEICO TECHNOLOGY S.A.S will delete personal data whose life cycle has already been completed, without the need for the authorization of the owner to be required for this. SEICO TECHNOLOGY S.A.S, when it has not previously warned, will notify the owner of the data that are going to be deleted of the cessation of their status as data controller with respect to them, indicating the cause of this.

Authorization for the processing of personal data

Both the collection, circulation and use of personal data that, by virtue of its operation, is carried out by SEICO TECHNOLOGY S.A.S, requires the free, prior, and informed consent of its owner. SEICO TECHNOLOGY S.A.S as responsible for the processing of said data, has the necessary mechanisms to obtain the authorization of its holders, which is completely verifiable.

Granting of authorization

In accordance with the wording of Law 1581 of 2012, the authorization will be made prior to the collection and processing of personal data, the procedures to which your data will be submitted and the purposes of use thereof will also be reported.

The main tool that is used by SEICO TECHNOLOGY SAS to obtain the respective authorizations by the holders of personal data is constituted by a written communication, which may be sent both by electronic and physical means, ensuring in any case why there is evidence that the owner has consented to provide said authorization.

In any case, the existence of the aforementioned format does not exclude the possibility that, taking into account the particularities of the case, SEICO TECHNOLOGY SAS makes use of the other means provided by Decree 1377 of 2013 to obtain the aforementioned authorizations, these being "in a manner orally or

through unequivocal conduct of the owner that allows to reasonably conclude that the authorization was granted. " (Article 7).

In the same vein, protected by the provisions of article 20 of Decree 1377 of 2013, they are entitled to exercise the rights of the owner, and therefore to provide the corresponding authorizations for the processing of personal data:

- The owner
- Your successors in title
- The owner's representative or attorney-in-fact
- A third party outside the owner, through the figure of "stipulation in favor of another", in accordance with the regulation contained within article 1506 of the Civil Code.

In all cases, the authorizations, regardless of the means of acquisition, will be conformed in accordance with the minimum requirements demanded by article 5 of Decree 1377 of 2013, that is, the exhibition of the finals for which they are being collected and will be processed personal data.

Verification and proof of authorization

The holders of personal data may, while SEICO TECHNOLOGY S.A.S. has the quality of data controller, request proof of the authorization they have provided.

To do this, in accordance with the standards relating to document management [2], SEICO TECHNOLOGY S.A.S. will digitize all those authorizations that have been granted using the physical format that has been adopted by the company. The holders who wish a copy of it, must make the corresponding request based on the provisions of the section on the procedure for the exercise of rights contained within this policy. Such will be the procedure applicable to those in which the authorizations have been granted by non-written means.

Cases where authorization is not required

In accordance with the regulations on the matter, SEICO TECHNOLOGY S.A.S. will not request authorization for the processing of personal data under the following assumptions:

1. When the data processed is of a public nature, including data related to the Civil Registry of people.
2. In cases of medical or health emergency.
3. The information processing has been authorized by law for historical, statistical or scientific purposes.

RIGHTS OF THE HOLDERS

SEICO TECHNOLOGY S.A.S., in its capacity as responsible for the processing of personal data, recognizes the following rights of all holders whose information is being processed by the company:

1. Know, update and rectify your personal data in front of SEICO TECHNOLOGY S.A.S.
2. Request proof of the authorization granted to SEICO TECHNOLOGY S.A.S.
 - Be informed by SEICO TECHNOLOGY S.A.S., upon request, regarding the use that has been given to your personal data.
1. Present before the Superintendency of Industry and Commerce complaints for infractions to the provisions of Law 1581 of 2012, once the consultation or claim process has been exhausted before SEICO TECHNOLOGY SAS, according to the content of the section "Procedure for the Exercise of Rights of the Holders" of this policy.
2. Revoke the authorization and / or request the deletion of the data when the principles, rights and constitutional and legal guarantees are not respected in the Treatment.
3. Free access to your personal data that have been subject to Treatment.

AREA RESPONSIBLE FOR THE EXERCISE OF THE RIGHTS OF OWNERS

SEICO TECHNOLOGY S.A.S. has designated the person who is occupying the position of "Commercial Director" as the person responsible for the attention to requests related to the exercise of the rights recognized to the holders whose information is being processed by the company. The above, by email comercial@seicotechnology.com.

For this, the person in charge will strictly adhere to the procedure adopted within this policy so that the holders can exercise their rights to know, update, rectify and delete the data and revoke the authorization; by filing petitions, inquiries and claims.

PROCEDURE FOR THE EXERCISE OF THE RIGHTS OF THE HOLDERS

All those in charge of processing personal data of SEICO TECHNOLOGY S.A.S. They must strictly follow the following procedure when any owner whose personal data is registered in any database of the company.

Contact channels

SEICO TECHNOLOGY S.A.S. has established as contact channels so that the holders can exercise their rights through the following:

- Website: <https://seicotechnology.com>
- Email: comercial@seicotechnology.com

The owners or their successors in title, by themselves or by proxy, may consult the information that is contained in the databases managed by SEICO TECHNOLOGY S.A.S.

Holders must prove their identity by attaching a copy of the identity card to the written request they submit. The successors in title must prove said quality by attaching the civil registration of birth of the deceased and of the successor in title, the civil registration of death and a copy of their identity document.



The quality can also be accredited by means of a copy of the deed that opens the succession, an order in which the heirs are recognized or a copy of the will, always presenting their identity document.

The proxies must present a copy of the power of attorney granted, which shall be presumed authentic, and a copy of their identity document.

Once SEICO TECHNOLOGY S.A.S. receives the request for information, it will proceed to review the individual record that corresponds to the name of the Holder and the identity document number provided. If you find any difference between these two data, you will inform it within five (5) business days of receipt, in order for the applicant to clarify it.

If after reviewing the document provided and the name of the Holder, it is found that there is agreement in them, it will proceed to respond within a term of ten (10) business days.

In the event that SEICO TECHNOLOGY S.A.S., considers that it requires more time to respond to the query, it will inform the Holder of such situation and will respond within a term that will not exceed five (5) business days following the expiration of the term.

Claims

The Holder or his Assignees who consider that the information contained in a database managed by SEICO TECHNOLOGY SAS should be subject to correction, updating or deletion, or if they notice a breach by this or any of its Managers, they may submit a claim before SEICO TECHNOLOGY SAS, or the Manager.

The claim will be formulated before SEICO TECHNOLOGY SAS, exclusively by means of an email sent to, accompanied by the document that identifies the Holder, the clear description of the facts that give rise to the claim, the address where you wish to receive notifications, which may be this physical or electronic, and attaching the documents that you intend to enforce.

The title of successor and attorney-in-fact must be demonstrated as explained in the previous point.



If the claim is incomplete, the interested party will be required within five (5) days after receiving the claim to correct the faults.

After two (2) months from the date of the request, without the applicant submitting the required information, it will be understood that the claim has been withdrawn.

In the event that SEICO TECHNOLOGY S.A.S., or the person in charge to whom it is addressed, is not competent to resolve it, it will transfer to the corresponding person within a maximum term of two (2) business days and will inform the interested party of the situation.

SEICO TECHNOLOGY S.A.S., will use a unique email for these purposes in such a way that it can be identified at what time it is transferred and the corresponding response or confirmation of receipt. If SEICO TECHNOLOGY S.A.S. does not know the person to whom it should be transferred, it will immediately inform the Holder with a copy to the Superintendency of Industry and Commerce.

Once the complete claim is received, the legend "claim in process" must be included in the corresponding database in the observation field, of the tables, EMPLOYEES, CLIENTS or SUPPLIERS, this must occur within a maximum term of two (2) business days.

The maximum term to answer the claim is 15 business days, if it is not possible to do so within this term, the interested party will be informed of the reasons for the delay and the date on which it will be attended, which may not exceed eight (8) days business following the expiration of the first term.

Complaints to the Superintendency of Industry and Commerce

The Holder, Cause-holder or attorney-in-fact must first exhaust this consultation or claim process, with the person responsible for the information, before addressing the Superintendency of Industry and Commerce to formulate a complaint.

Special provisions

Deletion of data: The deletion of data will not proceed when:

1. i) The owner has a legal or contractual duty to remain in the database.
2. ii) The elimination of data hinders judicial or administrative actions related to tax obligations, the investigation and prosecution of crimes or the updating of administrative sanctions.
3. iii) The data is necessary to protect the legally protected interests of the owner; to carry out an action based on the public interest, or to comply with an obligation legally acquired by the owner.

Revocation of authorization: The holders of personal data may totally or partially revoke the authorization to process their personal data at any time, as long as it is not prevented by a legal or contractual provision.

To do this, the holder in the request must indicate the reason for which the revocation is requested and the type of withdrawal if it is total or partial, with respect to a specific purpose. In cases where by contractual provision between the owner of the data and SEICO TECHNOLOGY S.A.S. revocation is not allowed, the termination of the obligation that gave rise to the authorization must be carried out in the first instance.

TREATMENT OF SENSITIVE DATA AND OF CHILDREN AND ADOLESCENTS

In principle, SEICO TECHNOLOGY S.A.S. will not process personal information that, in accordance with the definitions incorporated within this policy, have the character of SENSITIVE DATA. However, when eventually any of the data that can be cataloged within these categories becomes the object of treatment, SEICO TECHNOLOGY S.A.S. You will use them exclusively for any of the following purposes:

1. i) The treatment is necessary to safeguard the vital interest of the holder and he is physically or legally incapacitated. In these events, the legal representatives of the latter must grant their authorization.

2. ii) The treatment refers to data that are necessary for the recognition, exercise or defense of a right in a judicial process.
3. iii) The treatment has a historical, statistical or scientific purpose. In this event, the measures leading to the suppression of the identity of the Holders must be adopted.

In any case, with regard to the collection of sensitive personal data of the owners, SEICO TECHNOLOGY SAS, will inform the latter of the voluntary nature of the delivery of said data and their treatment will be mediated by the express authorization of the owner for such purposes.

Likewise, the treatment of the personal data of children and adolescents will always be mediated by the express authorization of their legal representative. Prior to the treatment and granting of the authorization by the latter, SEICO TECHNOLOGY S.A.S., will allow the child or adolescent whose data will be processed to express their agreement to the treatment, attending to the purposes of the same. This activity will not be accepted when, according to article 10 of Law 1581 of 2012, the information of the child and adolescent

1. a) Sea requerida una entidad pública o administrativa en ejercicio de sus funciones legales o por orden judicial;
2. b) Corresponda a datos de naturaleza pública;
3. c) Se obtenga en casos de urgencia médica o sanitaria;
4. d) Esté relacionada con su Registro Civil.

INFORMATION SECURITY AND CONFIDENTIALITY MEASURES

Based on the security principle of Law 1581 of 2012 and to comply with its provisions, SEICO TECHNOLOGY SAS has implemented a set of automated and administrative practices to prevent unauthorized access, adulteration or loss of personal data that is collected. These consist of:



Income per assigned user, who has designated software within the document management system used by the company. This role limits the possible accesses within the system and the functions (administration, configuration, consultation, deletion, etc.) that each user will have.

FINAL PROVISIONS

SEICO TECHNOLOGY S.A.S., may make changes or updates in the policies, which will be in force as long as the directives or by legal or administrative provision; In any case, informing the owners of the personal data about the modifications.

CURRENT NATIONAL LEGISLATION

It is important to reiterate that the activities related to the processing of personal data that SEICO TECHNOLOGY S.A.S. develops are regulated by the Superintendency of Industry and Commerce. Likewise, in this same matter Law 1581 of 2012, Decree 1377 of 2013 and in what corresponds to Law 1266 of 2008 referring to financial and credit data and consultation and reporting to risk centers will be applied. And the others that regulate, add or modify it.

This Information Treatment Policy is adopted in the city of Bogotá, on July 15, 2021, as a version 1.0 of it.

- Company legally constituted before the Chamber of Commerce of Bogotá; identified with the NIT 830.502.797-7; whose main address is in the municipality of Bogotá (Cun.), at the address Cll 38 # 29-36 Office 203 | With contact number (+57) 300 223 53 38 and email address: info@seicotecnology.com
- Resolution 8934 of 2014 of the Superintendency of Industry and Commerce, by means of which they establish the guidelines regarding document management and file organization that those monitored by said entity must comply with.