



POLICY OF TREATMENT AND PROTECTION OF DATABASES MARKETEROSWEB COLOMBIA SAS

1. SCOPE AND SCOPE OF APPLICATION.

In compliance with the superior norm, the Political Constitution in Article 15, Law 1581 of 2012 and Decree 1377 of 2013, MARKETEROSWEB COLOMBIA SAS proceeds to establish a policy for the management, protection and any treatment to which all the company's databases are subjected, including mechanisms for protection, administration and resolution of requests or claims of the holders of these, seeking transparency and speed in the resolution of the same with observance of the applicable legal norms.

2. PERSON IN CHARGE OF THE TREATMENT

The responsible for the processing of the databases covered by this policy is MARKETEROSWEB COLOMBIA SAS whose contact details are as follows:

- ADDRESS: CALLE 98 A No. 51-72 OF. 602
- TELEPHONE: (1) 729 3807
- E-MAIL: soporte@marketeros.com.co

DATA PROTECTION OFFICER

The legal representative will be the person in charge of the attention of the petitions, consultations, claims and other requests from the owners of the data for the exercise of their rights:

- TELEPHONE: (1) 729 3807
- E-MAIL: soporte@marketeros.com.co



The legal representative may delegate this function to the official of the accounting or legal area designated by him and the communications will be received in the mail contabilidad@marketeros.com.co.

3. DEFINITIONS.

HABEAS DATA: The right of every person to know, update and rectify the information that has been collected about him/her in files and data banks of a public or private nature.

- **PERSONAL DATA:** Any information linked or that may be associated to one or several determined or determinable natural persons.
- **DATA BASE:** Organized set of Personal Data that is subject to Processing.
- **PROCESSING:** Any operation or set of operations on personal data, such as collection, storage, use, circulation or deletion.
- **AUTHORIZATION:** Prior, express and informed consent of the Data Subject to carry out the Processing of personal data.
- **PRIVACY NOTICE:** It is the physical, electronic document or in any other format known or to be known, which is made available to the Data Subject for the processing of his/her Personal Data.
- **Data Controller:** Natural person whose personal data is the object of processing.
- **CAUSAHABITOR:** A person who by succession or transmission acquires the rights of another person.
- **PERSON RESPONSIBLE FOR THE PROCESSING:** Natural or legal person, public or private, who by himself or in association with others, decides on the database and/or the processing of the data.
- **PERSON IN CHARGE OF PROCESSING:** Natural or legal person, public or private, who by himself or in association with others, performs the Processing of personal data on behalf of the Controller.

4. PRINCIPLES.

The following principles shall be applied for the proper treatment of personal data bases, in accordance with the regulations in force:



- **Principle of legality in data processing:** The Processing referred to in this law is a regulated activity that must be subject to the provisions set forth therein and in the other provisions that develop it.
- **Principle of purpose:** The processing must obey a legitimate purpose in accordance with the Constitution and the Law, which must be informed to the Data Subject.
- **Principle of freedom:** Processing may only be carried out with the prior, express and informed consent of the Data Subject. Personal data may not be obtained or disclosed without prior authorization, or in the absence of legal or judicial mandate that relieves the consent.
- **Principle of truthfulness or quality:** The information subject to processing must be truthful, complete, accurate, updated, verifiable and understandable. The processing of partial, incomplete, fractioned or misleading data is prohibited.
- **Principle of transparency:** The right of the Data Subject to obtain from the Data Controller or the Data Processor, at any time and without restrictions, information about the existence of data concerning him/her, must be guaranteed.
- **Principle of restricted access and circulation:** Processing is subject to the limits derived from the nature of the personal data, the provisions of this law and the Constitution. In this sense, the Processing may only be carried out by persons authorized by the Holder and/or by the persons provided for in this law.

Personal data, except for public information, may not be made available on the Internet or other means of mass dissemination or communication, unless access is technically controllable to provide restricted knowledge only to Data Holders or third parties authorized in accordance with this law.

- **Security Principle:** The information subject to Processing by the Data Controller or Data Processor referred to in this law, shall be handled with the technical, human and administrative measures necessary to provide security to the records avoiding their adulteration, loss, consultation, use or unauthorized or fraudulent access.



- **Principle of confidentiality:** All persons involved in the processing of personal data that are not of a public nature are obliged to guarantee the confidentiality of the information, even after the end of their relationship with any of the tasks involved in the processing, and may only provide or communicate personal data when it corresponds to the development of the activities authorized in this law and under the terms of the same.

5. AUTHORIZATION.

TAKING OF AUTHORIZATION - The authorization may be contained in a physical document, electronic, data message, websites, in any other format that allows to guarantee its subsequent consultation, or through a suitable technical or technological mechanism, which allows to express or obtain consent via click or double click, by which it can be concluded unequivocally, that in the absence of a conduct of the Holder, the data would never have been captured and stored in the database. The authorization will be generated by MARKETEROSWEB COLOMBIA SAS and will be made available to the Holder in advance and prior to the processing of personal data.

The collection of data will be limited to those that are relevant and appropriate for the purpose for which they are collected or required in accordance with current regulations, meeting the needs of the company for the development of its corporate purpose. Except in cases expressly provided for by law, personal data may not be collected without the authorization of the Data Subject.

In accordance with Article 9 of Law 1581 of 2012, for the processing of personal data requires the prior and informed consent of the Holder. By accepting this policy, any holder who provides or provides information about their personal data, will be consenting to the processing thereof by MARKETEROSWEB COLOMBIA SAS in the terms and conditions stated in the standard, ie, directly, expressly and unequivocally.

PRIVACY NOTICE - The Privacy Notice (Annex No. 1) is the physical, electronic or any other format known or to be known, which is made available to the Data Subject for the processing of personal data. Through this document, the Holder is informed of the information regarding the existence of the information processing policies that will be applicable, the way to access them and the characteristics of the processing that is intended to be given to the personal data.



Occasions when authorization is not required.

The authorization of the Holder shall not be necessary in the case of:

- Information required by a public or administrative entity in the exercise of its legal functions or by court order;
- Data of a public nature;
- Cases of medical or sanitary emergency;
- Processing of information authorized by law for historical, statistical or scientific purposes;
- Data related to the Civil Registry of Persons.

6. RIGHTS OF THE OWNERS

Personal data subjects have the following rights, in addition to those recognized by law:

- To know, update and rectify their personal data before the Data Controller. This right may be exercised, among others, against partial, inaccurate, incomplete, fractioned, misleading data, or data whose processing is expressly prohibited or has not been authorized;
- Request proof of the authorization granted to the Data Controller, except when expressly exempted as a requirement for the Processing, in accordance with the provisions of Article 10 of Law 1581 of 2012;
- To be informed by the Data Controller, upon request, regarding the use made of their personal data;
- To file before the Superintendence of Industry and Commerce complaints for violations of the provisions of this law and other regulations that modify, add or complement it;
- To 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 Processing. The revocation and/or deletion will proceed when the Superintendence of Industry and Commerce has determined that in the Processing the Controller has incurred in conduct contrary to this law and the Constitution;



- Access free of charge to your personal data that have been subject to Processing.

6.1. CHANNELS FOR EXERCISING THE RIGHTS OF THE OWNERS

The Holder of Personal Data may exercise their rights by contacting MARKETEROSWEB COLOMOBIA SAS through written communication addressed to the Personal Data Protection Officer, The communication may be sent to the following email: soporte@marketeros.com.co, through written communication by traditional mail, delivered in person at carrera 16 No. 154-62, in the city of Bogota or through the website of MARKETEROSWEB COLOMOBIA S.A.S.

MARKETEROSWEB COLOMBIA SAS may establish forms, systems and other simplified methods, which must be informed in the privacy policy and will be made available to interested parties on the website www.marketeros.com.co.

7. DUTIES OF MARKETEROSWEB COLOMBIA SAS AS RESPONSIBLE FOR THE PROCESSING OF PERSONAL DATA.

MARKETEROSWEB COLOMBIA SAS as Responsible for the Processing of personal data, shall comply with the following duties:

- Guarantee to the Data Subject, at all times, the full and effective exercise of the right of habeas data.
- Request and keep, under the conditions set forth in the Law, a copy of the respective authorization granted by the Holder.
- Duly inform the Data Subject about the purpose of the collection and the rights he/she has by virtue of the authorization granted.
- Keep the information under the necessary security conditions to prevent its adulteration, loss, consultation, use or unauthorized or fraudulent access.
- Ensure that the information provided to the Data Processor is truthful, complete, accurate, updated, verifiable and understandable.



- To provide to the Data Processor, as the case may be, only data whose Processing is previously authorized in accordance with the provisions of this law.
- To require the Data Processor at all times to respect the security and privacy conditions of the Data Subject's information.
- Process queries and claims formulated in the terms set forth in Law 1581 of 2012.
- Adopt an internal manual of policies and procedures to ensure adequate compliance with the Law and, in particular, to deal with queries and complaints.
- Inform the Data Processor when certain information is under discussion by the Data Subject, once the claim has been filed and the respective process has not been completed.
- Inform the Data Subject, upon request, about the treatment given to his/her data.
- Inform the data protection authority when there are violations to the security codes and there are risks in the administration of the information of the Data Holders.
- Comply with the instructions and requirements issued by the Superintendence of Industry and Commerce.

8. PURPOSE AND PROCESSING OF PERSONAL DATA.

1. From employees:

MARKETEROSWEB COLOMBIA SAS collects the personal data of its **Employees**, and will only be disclosed by the entity with the express authorization of the holder or when requested by a Competent Authority.

The databases are stored in an automated and physical manner.

The purposes for which the personal data of the entity's employees are used are:

- To comply with the obligations imposed by Colombian labor law on employers.



- To comply with obligations contracted with persons directly or indirectly related to MARKETEROSWEB COLOMBIA SAS.
- Issue certifications regarding the relationship of the data subject with the Company.
- Comply with the obligations imposed on the company as an employer, in relation to Occupational Safety and Health standards, and the so-called Occupational Safety and Health Management System (SG- OSH).
- Manage the functions performed by the workers.
- Consult memos or reminders.
- Develop and apply the disciplinary process.
- Perform processes of selection y hiring of personnel for MARKETEROSWEB COLOMBIA SAS
- Contact authorized persons in case of emergency.

Also, **MARKETEROSWEB COLOMBIA SAS** stores personal data that have been obtained in the development of the selection process of its employees in a folder identified with the name of each of them.

Such folder will only have access and will be treated by the legal representative and / or whoever acts as manager or administrator, in order to manage the contractual relationship between **MARKETEROSWEB COLOMBIA SAS** and the employee.

Upon termination of the employment relationship, **MARKETEROSWEB COLOMBIA SAS** will proceed to store all personal data obtained from the selection process and the documentation generated in the development of the employment relationship, in a central file, subjecting at all times the information to appropriate measures and security levels such as filing cabinets with restricted access and security lock, since the labor information may contain sensitive data.

In any case, the information will not be processed for a period exceeding twenty (20) years from its collection in accordance with the legal or contractual circumstances that make it necessary to handle the information.

8.1 From suppliers.

MARKETEROSWEB COLOMBIA SAS collects the data of its suppliers who are legal entities, however, in the event of processing the data, the following data will be collected



personal data to suppliers who are natural persons, will be stored in an automated database which will be classified by the company as reserved, and will only be disclosed by **MARKETEROSWEB COLOMBIA SAS** with the express authorization of the owner or when a Competent Authority requests it.

The purposes for which the personal data of **MARKETEROSWEB COLOMBIA SAS** Suppliers are used will be:

- Sending invitations to contract and making arrangements for the pre-contractual, contractual and post-contractual stages.
- Communication for matters inherent to the commercial relationship with our suppliers, information analysis, market intelligence, processing of information about our new or existing products, services, promotions, offers and improvement of the service offered by **MARKETEROSWEB COLOMBIA SAS**.
- To carry out the pertinent steps for the development of the pre-contractual, contractual and post-contractual stages with the Responsible Party, with respect to any of the products or services acquired or with respect to any underlying business relationship with the same, as well as to comply with Colombian or foreign law and the orders of judicial or administrative authorities.
- Others specifically established in the authorizations granted by the suppliers themselves.
- Creation in your systems of the new supplier and updates of supplier records as needed.
- Reporting of information to the competent official bodies such as Magnetic Media and District media.
- Performing accounting processes such as invoice payments.
- And other inherent in the development of the corporate purpose of Marketeros Web.



MARKETEROSWEB COLOMBIA SAS will only collect from its suppliers the data that are necessary, relevant and not excessive for the purpose of selection, evaluation and execution of the contract.

8.2 From Customers.

MARKETEROSWEB COLOMBIA SAS collects the personal data of its customers and stores them in an automated database, which is classified by the company as reserved, and will only be disclosed with the express authorization of the owner or when requested by a Competent Authority.

The purposes for which the personal data of **MARKETEROSWEB COLOMBIA SAS** customers are used will be:

- To carry out promotional, loyalty and marketing activities.
- General relationship with each client.
- To make quotations and commercial offers according to the requirements of the same customer
- Quotations for projects that, even if they do not materialize, the holders will be considered clients, referrals, interested parties or potential clients.
- Carry out promotions and strategies through Social Networks where business is finalized (projects) and our services are marketed.
- Through studies of the web pages of potential clients.
- Through mailings with commercial offers.
- Generate accounting processes in invoicing, magnetic media information before the Dian and District Media before the District Treasury.
- When updates are made in the periods determined by the Company.
- Create databases for the purposes described in the information processing policy and privacy notice, available at <https://www.marketerosweb.co>.
- To carry out invitations to events, improve products and services or offer new products and all those activities associated with the commercial relationship or existing link or that which may come to have with the Responsible Party.
- Making a contract to formalize the business for the provision of services and / or products of the Company Marketeros Web in the relevant steps for the development of the pre-contractual stage,



contractual and post-contractual with the Responsible Party, with respect to any of the products or services offered by the Company.

- Inform about new products and services.
- Conduct market research.
- To achieve an efficient communication related to our services and other activities related to the corporate purpose of MARKETEROSWEB COLOMBIA SAS.
- Inform about changes in MARKETEROSWEB COLOMBIA SAS services.
- Evaluate the quality of the service.
- Update data annually.
- Generate invoicing processes.
- Conduct internal studies on consumption habits of the services and products offered.
- To comply with obligations contracted with our clients.
- Others mandated by law

9. INTERNATIONAL TRANSFER AND TRANSMISSION OF PERSONAL DATA

The company currently does not perform international transfer of personal data. In the event that the entity decides to make the international transfer or transmission of personal data, in addition to having the express and unequivocal authorization by the owner, **MARKETEROSWEB COLOMBIA SAS** will ensure that the country to which the data are transferred or transmitted to provide adequate levels of data protection, which in no case may be lower than those set in Colombia by the Statutory Law 1581 of 2012 and its regulatory decrees.

INTERNATIONAL TRANSFER OF PERSONAL DATA

When sending or transferring data to another country, it is essential to have the authorization of the owner of the information being transferred. Unless the law states otherwise, the existence of such authorization is a prerequisite for the international circulation of data. In this sense, before sending personal data to another country, those obliged to comply with this policy must verify that they have the prior, express and unequivocal authorization of the owner that allows the transfer of their personal data.



Such transfer of personal data will be made only to third parties with whom the Controller or its suppliers have a contractual, commercial and / or legal relationship that qualifies them as such to ensure the proper treatment of the data transmitted or transferred, in accordance with Law 1581 of 2012 and regulatory decrees.

10. DATA ON CHILDREN AND ADOLESCENTS

MARKETEROSWEB COLOMBIA SAS does not process Personal Data of minors. However, when it does, the entity shall ensure respect for the rights of children and adolescents, which prevail in any case, and collect in all cases the respective authorization for treatment granted by the legal representative of the minor holders.

11. PROCEDURE FOR HANDLING QUERIES, CLAIMS AND PETITIONS

11.1 Inquiries

The Holders or their assignees may consult the personal information of the Holder that is stored in **MARKETEROSWEB COLOMBIA SAS**, who will be responsible for providing all the information contained in the individual record or that is linked to the identification of the Holder.

The consultation, once received by the entity, will be answered within a maximum term of **ten (10) business days from the date** of receipt thereof.

When it is not possible to attend the consultation within said term, the interested party shall be informed, stating the reasons for the delay and indicating the new date on which the consultation will be attended, which in no case may exceed **five** days.

(5) business days following the expiration of the first term.

11.2 Claims



The Holder or its assignees who consider 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 this law, may file a claim with **MARKETEROSWEB COLOMBIA SAS** which will be processed under the following rules:

1. The claim shall be formulated by written communication addressed to **MARKETEROSWEB COLOMBIA SAS** with the identification of the Holder, the description of the facts that give rise to the claim, the address, and accompanying documents to be asserted to the e-mail soporte@marketeros.com.co and/or contabilidad@marketeros.com.co.

If the claim is incomplete, the interested party will be required within five **(5) days** of receipt of the claim to correct the faults. After two **(2) months** from the date of the requirement, without the applicant submitting the required information, it will be understood that the claim has been withdrawn.

In case **MARKETEROSWEB COLOMBIA SAS** receives a Claim which is not competent to resolve it, the company will transfer it to the person who actually corresponds; a legal professional or when **MARKETEROSWEB COLOMBIA SAS** is in charge, it will transfer it to the responsible, within a maximum period of **two (2) working days** and inform the Holder.

2. Once the complete claim has been received, the entity will include in the respective database a legend that reads "**claim in process**" and the reason for the claim, within a term no longer than **two (2) business days**. The company will keep such legend in the data under discussion until the claim is decided.

3. The maximum term to address the claim will be **fifteen (15) working days** from the day following the date of receipt. When it is not possible to address the claim within such term, the entity will inform the Holder the reasons for the delay and the new date on which the claim will be addressed, which in no case may exceed **eight (8) business days** following the expiration of the first term.



11.3 Procedural Requirement

The Holder or its assignee may only file a complaint before the Superintendence of Industry and Commerce once the Consultation or Claim process has been exhausted directly before the entity.

11.4 Request for update and/or rectification

MARKETEROSWEB COLOMBIA SAS, will rectify and update, at the request of the holder, the information that is inaccurate or incomplete, according to the procedure and terms outlined above, for which the Holder must submit the request according to the channels provided by the company, indicating the update and rectification of the data and in turn must provide documentation to support such a request.

11.5 Revocation of authorization and/or deletion of the Data

The Data Subject may revoke at any time the consent or Authorization given for the processing of his/her personal data, as long as there is no impediment enshrined in a legal or contractual provision.

Also the Data Subject has the right to request at any time to **MARKETEROSWEB COLOMBIA SAS**, to the e-mail soporte@marketeros.com.co contabilidad@marketeros.com.co the deletion or elimination of their personal data when:

- Consider that they are not being treated in accordance with the principles, duties and obligations set forth in the regulations in force.
- Are no longer necessary or relevant for the purpose for which they were obtained.
- The time necessary for the fulfillment of the purposes for which they were obtained has elapsed.

Such deletion implies the total or partial elimination of personal information, as requested by the owner in the records,



files, databases or treatments made by **MARKETEROSWEB COLOMBIA SAS**. The right of cancellation is not absolute and therefore **MARKETEROSWEB COLOMBIA SAS**, may deny revocation of authorization or deletion of personal data in the following cases:

- The holder has a legal or contractual duty to remain in the database.
- The deletion of data hinders judicial or administrative proceedings related to tax obligations, the investigation and prosecution of crimes or the updating of administrative sanctions.
- The data is necessary to protect the legally protected interests of the holder; to carry out an action in the public interest, or to comply with an obligation legally acquired by the holder.

12. MODIFICATION OF POLICIES

The entity reserves the right to modify the Personal Data Processing Policy at any time. However, any modification will be communicated in a timely manner to the Personal Data Holders through the usual means of contact with ten (10) working days prior to its entry into force.

In the event that a Data Subject does not agree with the new Policies and with valid reasons that constitute a just cause for not continuing with the authorization for the processing of personal data, the Data Subject may request the entity to withdraw his/her information through the channels indicated in chapter 6 numeral 1. However, Data Subjects may not request the withdrawal of their personal data when the entity has a legal or contractual duty to process the data.

13. IGENCY

This Policy is effective as of January 1, 2018.

14. PRIVACY NOTICE ADDENDUM



PRIVACY NOTICE MARKETEROSWEB COLOMBIA SAS

MARKETEROSWEB COLOMBIA SAS domiciled in the city of Bogota, Colombia, is responsible for the processing of personal data.

How to contact us?

- ADDRESS: CALLE 98 A No. 51-72 OF. 602
- TELEPHONE: (1) 729 3807
- MAIL EMAIL: soporte@marketeros.com.co
and contabilidad@markeros.com.co

Your personal data will be included in a database and will be used for the following purposes:

- To achieve an efficient communication related to our products and other activities related to the corporate purpose of **MARKETEROSWEB COLOMBIA SAS.**
- Inform about new products.
- Carry out promotional and/or marketing activities.
- Conduct consumer preference studies.
- Company's Internal Administrative and Accounting Processes
- To comply with obligations contracted by clients, consumers, suppliers and other persons directly or indirectly related to MARKETEROSWEB COLOMBIA SAS.
- Inform about changes in MARKETEROSWEB COLOMBIA SAS services.
- Evaluate the quality, timeliness and stability of the service.
- Update the data at least once a year or as the Company determines necessary.
- Take customer data to offer the service and products MARKETEROSWEB COLOMBIA SAS every time you buy or purchase services and in order to generate the respective document or invoice.
- Conduct internal studies on consumption habits of the services and products offered.
- To carry out personnel selection and hiring processes for MARKETEROSWEB COLOMBIA SAS.



Personal data owners are informed that they can consult the "Personal Data Processing Policy" of MARKETEROSWEB COLOMBIA SAS at the following web page: www.marketerosweb.co

ANNEX FORM FOR THE EXERCISE OF THE RIGHT

- 1. Print annex number 1 of this policy (form for the exercise of Rights) and fill in each of the fields. If you do not have access to the form, you can file a document in which it is specified:
 - First and last names,
 - Contact information (physical and/or electronic address and contact telephone numbers),
 - Means to receive a response to your request,
 - Reason(s)/fact(s) giving rise to the claim,
 - Description of the right you wish to exercise before the Responsible,
 - Signature, identification number and fingerprint.
 - File it in original at the offices of The Responsible Party.
- 2. Attach a copy of the holder's identity document enlarged to 150%. When the request is made by a successor, attorney-in-fact and/or representative of the holder, he/she must prove such capacity.
- 3. Attach the documents supporting your request and/or violation of your rights. Consult our web page:
- 4. go to our facilities, available for public attention.
- 5. File the required form and attachments, and request a copy of the file.
- 6. You may contact the Responsible Party within five (5) business days after your request has been filed, in order to validate the status of your request.