

**MANUAL OF GOOD PRACTICE FOR THE PROCESSING OF
PERSONAL DATA IN "REYES ABOGADOS ASOCIADOS S.A."**

REYES ABOGADOS ASOCIADOS S.A. ("the Firm"), hereby discloses its "Manual of Good Practices for the Processing of Personal Data" (the "Manual"), which establishes the Firm's policies regarding the treatment of any personal data, in compliance with Law 1581 of 2012 and Decree 1377 of 2013.

This Manual is available to all holders of personal data whose information is handled by the Firm, so they may know their rights, the procedures, the scope, the purpose and the mechanisms provided by the Firm for the management of such data, management which requires written, informed and express authorization from said holders.

1. **Identification of the entity responsible of the processing of personal data:** REYES ABOGADOS ASOCIADOS S.A., a corporation incorporated under the Laws of the Republic of Colombia, domiciled in the city of Bogotá D.C., with the following notification information: (i) address: Carrera 7 N° 113-43 (Oficina 909); (ii) email: administracion@reyesaa.com; and (ii) telephone number: (+571) 6207870.

2. **Principles:** This Manual for the processing of persona data will be implemented under the Firm's general principles, as well as the following:
 - a. **Prior authorization:** prior informed and unequivocal consent is required from the holder of the personal data for the management of his/her personal information;

 - b. **Authorized purpose:** The authorized purpose will be understood as the purpose established by this Manual, depending on the relationship that the holder of the personal data has with the Firm;

 - c. **Confidentiality:** The information provided by the holder of the personal data will be considered confidential and will not be transmitted to any third parties, unless there is a specific authorization from the holder, or a request by official authority;

- d. **Safety:** The Firm will use reasonable efforts to prevent unauthorized access by third parties to the information provided, as well as the adulteration, loss, consultation, use, or any unauthorized or fraudulent access to such information;

 - e. **Access to the information by the holder:** At any time, the holder of personal data may access and have full knowledge of the information processed by the Firm regarding her/him;

 - f. **Duration:** The Firm may collect, store, use or circulate personal data for as long as it is reasonable and necessary, in accordance with the authorized purpose;

 - g. **Individuality:** Any information held by the Firm regarding the holders of the information will be kept separate from information concerning other persons;

 - h. **Quality of the information:** The information resulting from a process by the Firm shall be truthful, complete, accurate, current, verifiable and understandable.
3. **Treatment and purposes of the information:** The Firm, as well as any third parties who under law or a contract have access to personal information provided by the holder thereof, will use such information based on the following criteria:
- a. **Children and adolescent's data:** Its use will be limited to information of a public nature, and any use requires permission from parents or guardians of the minors. This to ensure action in best interests of children and adolescents, and preservation of their fundamental rights and other constitutional or legal principles.

 - b. **Client's data:** Its use is required by the Firm in order to properly perform the contracted services and to obtain detailed information on the actions taken in order to render the contracted services. Additionally, the Firm may submit invoices to the

registered addresses of clients, and arrange for collection of such invoices as it deems necessary.

Additionally, the Firm may provide news and legal updates in order to inform on regulatory, legal, doctrinal and jurisprudential developments, or any other types of updates on matters it deems of interest.

- c. **Employee's data:** Its use will be aimed to the development of the employer/ employee relationship, from the time of hiring and up to ten (10) years following the end of the employment contract. Similarly, the personal information may be used by the Firm, or by a third party legally or contractually bound to it, in order to manage payrolls and other employee benefits, and to exercise any processes of identification and acquisition of proper knowledge of the personnel.
- d. **Supplier's data:** Its use will be directed to the procurement of services or products that the Firm requires for its normal operation, for a period which commences at the entering in a contact and ends at the completion of any possible contractual relationship.
- e. **External consultant's data:** Its use will be aimed to obtaining outside professional support in legal matters or ancillary issues, either for the Firm or for its clients, with prior authorization from the holders.
- f. **Job candidate's data:** Its use will be in the context of personnel selection processes carried out by the Firm. To ensure this, the Firm may: **i)** Store, process and categorize the information in the databases that the Firm may deem appropriate; **ii)** Verify, confirm, corroborate, validate and compare the information provided by the holders, through all legal means available to the Firm; **iii)** To study, analyze and share data with allies of the Firm, who will ensure compliance with this Manual and the confidentiality of the information, with prior permission of the holder; **iv)** If necessary, in the event the Firm lacks the necessary expertise, the information may be transmitted to a third party in charge of its management, with prior notice to the holders of the data, and with sufficient guarantees of confidentiality and proper management by the third party chosen for this purpose;

- v)** Inform the candidate of the result of the selection process in which he/she has participated; and **vi)** Contact candidate for future personnel selection processes that fit their profile.
- g. **Sensitive data:** Its use will be limited to cases in which the law authorizes treatment and in any case there will be a limited and controlled use of such data, in order to guarantee the right to honor and privacy of holder of the personal information.
- h. **General Purpose:** Data supplied by the holders may be used for the control and prevention of fraud and money laundering, including but not limited to consultation on restrictive lists, such as the OFAC list and all information required for SARLAFT, as necessary. Likewise, data may be used for the administrative and operational work of the Firm, with leave to convey such information, upon notice to the holders, to contractual or legally related third parties, who should treat the information in accordance with the provisions of this Manual and/or the Law.
4. **Holder's rights:** Holders of the personal data, at any time, shall have the right to: **i)** Know, update and correct personal data provided to the Firm, as the entity responsible and in charge of the treatment of such data; similarly, holders have the same capacity with regard to any third parties to whom the information has been transmitted; **ii)** Request to the Firm proof of consent for data processing, except in cases expressly excepted; **iii)** Be informed, upon request, about the treatment given by the Firm or any third party in charge to the personal data provided by the holder; **iv)** Appear before the Superintendence of Industry and Commerce to file complaints for violations of the provisions on the Protection of Personal Data; **v)** Reverse or amend the authorization; **vi)** Request the removal of personal information when the use of such information is in violation of any principles, rights and constitutional or legal guarantees; **vii)** Access the personal data that has been treated by the Firm, or by third parties responsible for the management of the data; **viii)** Have easy access to this Manual; and **ix)** Understand any amendment, upgrade or replacement of this Manual, prior to its formalization.
5. **Holder's rights regarding sensitive data:** Holders of sensitive data may refrain from providing such sensitive information, such as information related to racial origin, religious beliefs, political affiliation, union membership, social organizations membership, sexual orientation and health, among others.

6. **Attention to requests, inquiries, complaints or claims:** Holders of personal data, shall have the right to make phone requests, inquiries, complaints or claims, from Monday to Friday from 8:00 am to 1:00 pm and from 2:00 pm to 6:00 pm, at (+571) 6207870, as well as writing to the e-mail administracion@reyesaa.com.

7. **Procedure for exercising the rights:** The exercise of rights will be subject to the following procedure:
 - a. **Persons entitled to exercise the rights:** Holders of personal data, their successors, legal representatives or their duly accredited representatives may exercise the rights set out in this Manual and those embodied in the Constitution or the law.

 - b. **Response term to the request:** The Firm, upon receiving the request, shall have ten (10) business days to process the request and effectively respond. Should the Firm require additional time, the Firm will communicate this situation to the petitioner and shall have a maximum of five (5) additional business days to respond substantively.

 - c. **Incomplete or unclear requests:** Any incomplete or unclear requests, which do not allow the Firm to determine the Holder of the data or content of the request shall be corrected. For this purpose, the Firm shall inform the petitioner about this situation within five (5) working days as of the receipt of the request. If within two (2) months from the request for clarification by the Firm, the petitioner has failed to remedy the application, it will be understood that there he/she has withdrawn his/her request and, accordingly, the Firm will proceed to dismiss the request, with no formal answer by the Firm required.

 - d. **Changes, updates, or replacement of the Manual:** In case the Firm becomes aware of the need to modify, update or replace this Manual, it shall communicate the decision to the holders of personal data. In this communication, the Firm will attach the amendments, updates or the new version of the Manual, so that the Holder may exercise his/her rights over a period of fifteen (15) working days prior to the changes or over the same period subsequent to the effective date of the new

version of the Manual. Once this period has expired and the new Manual is in force, the acceptance from the holders to the amendment of the Manual will be presumed, without prejudice to the rights that can be exercised at any time.

8. **Safety of the information:** The Firm has adopted, and requires from any third party who may be placed in charge of the data, to take all reasonable steps to protect the personal information and to prevent access to the data from unauthorized persons. This with the purpose of maintaining the integrity of the data and preventing the adulteration or deletion of the information. For this purpose, the Firm has limited the access to databases by certain employees, contractors, representatives or agents of the Firm.

Notwithstanding the above, the Firm will not be responsible for cyber-attacks that may occur, and it shall also remain harmless for any action committed by third parties in order to bypass the controls and security measures adopted by the Firm or by the third party who might be processing the information. This, without detriment to the Firm's power to take all appropriate action to regain control of the data and to hold accountable those responsible.

9. **Validity of this Manual:** This Manual is effective upon publication. The collected personal data will rest in the respective database until required in order to fulfill the purposes of the collection, provided that, at any time, the information shall be removed at the request of the holder, its successor, legal representative or attorney.