

PERSONAL DATA AND PRIVACY PROTECTION POLICY

ENKA DE COLOMBIA S.A. (hereinafter the “Company”) identified with Tax Identification Number (NIT) 890.903.474-2, in compliance with Statute 1581 of 2012 and Regulatory Decree 1377 of 2013, as the entity responsible for the Treatment, hereby discloses the policies for treatment of personal data.

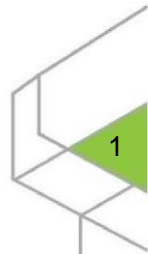
1. SCOPE

This document that contains the Policies and Procedures for Personal Data Treatment (hereinafter “the Policy”) applies to any individual’s data stored in the Company’s databases.

2. POLICY FOR THE TREATMENT OF PERSONAL INFORMATION

This Policy ensures that personal information will be processed according to the provisions of applicable regulations, including the following considerations:

- The Company represents that it will comply with the laws and regulations governing personal information, which will be managed in an appropriate manner according to the activities of the Company’s business and respecting the rights of Information Owners.
- The contents of this Policy are subject to Law 1581 of 2012 and Decree 1377 of 2013, and is available to the owners of the Information and third parties who wish to consult it.
- The Company gathers personal information during various processes and for the following purposes:
 - Human resources:
Employee information, payroll management, fringe benefits, management and payment of social security contributions, social welfare, administrative management, personnel training, and selection processes.
 - Clients, suppliers, contractors, shareholders:
Client management, supplier management, contractor management, tax management, shareholder management, economic and accounting management, fiscal management, business relations history, control of asset laundering and terrorist financing.
 - Security:
Access security and control, and video surveillance.



- Under no circumstances should information be collected from the Owner of the Information if he or she does not understand the stated purposes and uses disclosed above.
- Should the purpose for which the information is used be changed or modified, the scope hereof must be completely disclosed, and the owner of the information must be informed or notified of any changes without delay.
- When any information is disclosed to third parties, it is necessary to ascertain that the purpose for which the information will be used is specified herein.
- Guarantees must be established to ensure that the capture and treatment of the information, and to reply to any questions about it, have all the appropriate control and security measures to protect the information and its owner.

3. INFORMATION OWNERS' RIGHTS

The owner of the personal information shall have the following rights:

- a) Know, update, and correct their personal information through the parties responsible for or in charge of data processing. This right may be exercised, among others, with respect to partial, inaccurate, incomplete, or fragmentary information that can lead to errors, or those whose Processing is expressly prohibited or has not been authorized.
- b) Request proof of Authorization from the party responsible for data Processing, except when there is an explicit exception as required by Article 10, Law 1581.
- c) To inquire from the Party responsible for Data Processing or the Party in charge of data Processing, about how the owner's personal information has been used.
- d) File complaints with the Superintendence of Industry and Trade (Superintendencia de Industria y Comercio) over violations of this Law and other regulations that modify, add to, or complement it.
- e) Revoke the authorization and/or ask for the elimination of the information when the principles, constitutional and legal rights and guarantees are violated. The revocation and/or deletion will apply when the Superintendence of Industry and Trade (Superintendencia de Industria y Comercio) determines that the party responsible or in charge of the information violated this law or the constitution.
- f) Have free access to the owner's personal information that has been Processed.

4. SERVICE CHANNELS FOR OWNERS OF THE INFORMATION

For requests, questions and/or complaints, the owners of the information can contact:

- The following email: datospersonales@enka.com.co
- The following address: Calle 3 Sur #43A – 52 Piso 5 in Medellín.
- The address: VIA CABILDO KM 2 in Girardota
- Telephone number: 4055139

RESPONSIBILITIES

- a) Any Company employee who performs any process or procedure requiring the capture the Data Owner's information is responsible for reporting the purpose of such capture.
- b) The Data Owner must sign an authorization allowing the Company to process the data.
- c) The individual in charge of the procedure must obtain proof of authorization and file such proof in the appropriate manner.

5. FINDING, MODIFYING, AND FILING COMPLAINTS ABOUT PERSONAL INFORMATION

The procedure to exercise the Data Owner's rights consists of the following steps:

- The Data Owner must send a request to the person in charge of handling the requests, petitions, questions and/or complaints from Data Owners (see item 4).
- Processing and responding to the petition shall comply with the terms and times specified in Articles 14 and 15, Law 1581 of 2012.

6. DURATION

This document shall be effective as of July 2013.

Updated: March 20, 2020.