

POLICY FOR THE TREATMENT OF PERSONAL DATA OF SEMPERTEX GROUP

SEMPERTEX GROUP, (i) SEMPERTEX DE COLOMBIA S.A. y (ii) SEMEPRTX ZF, in its capacity as responsible for personal data processing, with main office located in Barranquilla, Atlántico, at Via 40 # 64-198 Industrial Zone Loma 3, email: cumplimiento@semeprtex.com, adopts the following policy for personal data processing:

SEMPERTEX GROUP implements this "Policy for the Treatment of Personal Data" so that the owners of the Personal Data collected and stored by the Company can exercise their rights under current national and international rules (giving scope to the European Data Protection Regulation - GDPR).

1. THE MANNER IN WHICH THE PERSONAL DATA WILL BE TREATED:

SEMPERTEX GROUP may (i) collect, (ii) update, (iii) use, (iv) store, (v) process, (vi) circulate personal data to its business partners with the express and unequivocal consent of the Data Subject, (vii) Transfer the data internationally when the Data Subject has given express and unequivocal permission and the legal requirements are met (viii) make international transmissions of personal data to allow third parties acting as Data Processors to process the data on SEMPERTEX GROUP's behalf and (viii) delete personal data in accordance with its document retention tables and in legal events.

2. PURPOSES OF TREATMENT:

Personal data will be processed for the following purposes based on the nature of each natural person's relationship with SEMPERTEX GROUP:

2.1. Personal data of SEMPERTEX GROUP employees, former employees, and pensioners, as well as candidates for personnel selection processes, will be processed for the following purposes: (i) Personnel management, promotion and selection of personnel, personnel training, staff training, schedule control, payroll management, social benefits, and occupational risk prevention are all examples of human resource management purposes. (ii) Other teachings and events, as well as training and education. (iii) Labor and social welfare issues include occupational training, social welfare benefits, and child protection. (iv) Accounting, tax, and administrative management (v) Justice and judicial procedures (vi) Granting and managing permits, licenses, and authorizations (vii) Internal statistics management (viii) administrative procedures (ix) (x) Health-care issues under the employer's control, such as medical or dental appointments, health-care authorization management, and medical records. (x) Access to subsidies. (xi) Financial administration. (xii) Building security and access control. (xiii) Administrative administration. (xiv) Transportation of passengers (employees to and from the work site) Transportation ticket reservations and issuance (xv) Promotion. Loyalty (xi)

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- 2.2. Personal data of visitors to SEMPERTEX GROUP's physical facilities will be processed for the following purposes: (i) facility management and administrative processes (ii) building security and access control (iii) legal defense.
- 2.3. Customers' personal data, marketing event attendees' personal data, and people who register on the websites www.sempertex.com and shop.sempertex.com will be processed for the following purposes: (i) Sales and billing (ii) Marketing via email, social media, data messages, or phone (iii) Customer loyalty via email, social media, data messages, or phone calls. (iv) Commercial prospecting and advertising activities such as sending own and third-party advertising, offering products and services. (v) Training and training invitations (vi) Internal statistics management (vii) historical, scientific, or statistical purposes (viii) Decision support systems for advertising and marketing research (ix) Advertising and commercial prospecting - Market segmentation and profile analysis - Supplier linking
- 2.4. Contractors', suppliers', ex-contractors', and ex-suppliers' personal data will be processed for accounting, fiscal and administrative management, security and security, and access control to buildings.
- 2.5. Personal data of SEMPERTEX GROUP distributors OR those interested in becoming SEMPERTEX GROUP distributors who register on the SEMPERTEX GROUP website will be processed for the purposes set out in paragraph above, and your contact number will be published on the website in accordance with the authorization granted for that purpose.
- 2.6. Personal data of a public nature of employees' and business associates' children, whose collection has been authorized in accordance with Article 2.2.2.2.25.2.9 of Decree 1074 of 2015, will be processed for the purpose of sending details at special times of the year such as Christmas and/or year-end.

3. RIGHTS OF PERSONAL DATA HOLDERS OR NATURAL PERSONS WHOSE DATA IS PROCESSED BY SEMPERTEX GROUP

The Data Subject is entitled to the following rights:

- 3.1. To be aware of, update, and correct its personal data held by SEMPERTEX GROUP or its data processors. This right may be exercised, among other things, against partial, inaccurate, incomplete, fractioned, or misleading information, as well as those whose treatment is expressly prohibited or has not been authorized.
- 3.2. In accordance with the provisions of Article 10 of Law 1581 of 2012, to request proof of the authorization granted to SEMPERTEX GROUP, unless expressly exempted as a requirement for processing.

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- 3.3. To be informed of the use of their personal data by SEMPERTEX GROUP or its Data Processor (if applicable) upon request.
- 3.4. To file complaints with the Superintendence of Industry and Commerce for violations of Law 1581 of 2012 and other regulations that modify, add, or supplement it.
- 3.5. To revoke the authorization and/or request that their data be deleted.
- 3.6. To obtain free access to their personal data that has been subjected to Processing.
- 3.7. To avoid answering questions about sensitive information. Answers relating to sensitive data or data pertaining to children and adolescents will be optional.

4. PERSON OR AREA RESPONSIBLE FOR THE ATTENTION OF REQUESTS, QUERIES, AND CLAIMS BEFORE THE OWNER OF THE INFORMATION CAN EXERCISE ITS RIGHTS TO KNOW, UPDATE, RECTIFY, AND DELETE THE DATA, AS WELL AS REVOKE THE AUTHORIZATION.

SEMPERTEX GROUP's compliance officer is responsible for processing holders' requests to enforce their rights. The channel to receive and respond to petitions, requests, inquiries, and complaints will be email: cumplimiento@sempertex.com or sent by physical means to SEMPERTEX GROUP at Carrera 40 No. 64 - 198 ZN Loma 3 Barranquilla Atlántico.

5. PROCEDURE FOR INFORMATION HOLDERS TO EXERCISE THEIR RIGHTS TO KNOW, UPDATE, RECTIFY, AND DELETE INFORMATION, AS WELL AS REVOKE AUTHORITY.

The following is the procedure and minimum requirements for holders of personal data to exercise their rights:

The following information is required for the filing and attention of their request:

- Full name and last name
- Contact information (physical and/or e-mail address, as well as phone numbers)
- Means to receive a response to their request,
- Reason(s) for the claim, along with a brief description of the right you wish to exercise (know, update, rectify, request proof of authorization granted, revoke, delete, access to information).

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- Signature (if applicable) and identification number.

The maximum time allowed by law to resolve personal data protection inquiries is 10 business days from the date of receipt. When it is not possible to respond to the consultation before that term, it may be extended for up to 5 additional working days.

The maximum legal term for resolving claims is fifteen (15) working days, counting from the day after receipt. If it is not possible to attend to the claim within such term, SEMPERTEX GROUP will notify the interested party of the reason for the delay and the date on which the claim will be attended, which shall not be more than eight (8) working days after the first term has expired.

After complying with the terms of Law 1581 of 2012 and other rules that regulate or supplement it, the Data Subject who is denied, in whole or in part, the exercise of the rights of access, updating, rectification, deletion, and revocation may bring the case to the attention of the Superintendence of Industry and Commerce Delegation for the Protection of Personal Data.

6. THE DATABASE'S VALIDITY PERIOD AND THE EFFECTIVE DATE OF THE INFORMATION PROCESSING POLICY

This Personal Data Processing Policy is in effect as of March 31, 2022.

The provided personal data will be kept as long as the data subject does not request deletion and there is no legal obligation to keep them.

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