



K2 ENGINEERING SAS

Bucaramanga – Colombia.

CODE: MAO102-01 VERSION:

03

DATE: 2023-10-19

MAO102-01 MANUAL OF POLICIES AND PROCEDURES FOR THE TREATMENT AND PROTECTION OF PERSONAL DATA

ACTION	EXECUTED BY	POST	APPROVAL STATUS		DATE
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PERSONAL DATA PROCESSING POLICY

In compliance with the provisions of Statutory Law 1581 of 2012 and its Regulatory Decrees, the company establishes the General and Special Policy applicable to the Treatment and Protection of Personal Data in the organization.

1. IDENTIFICATION OF THE RESPONSIBLE:

K2 INGENIERIA SAS, commercial company identified with NIT No. 804.007.055-3 is established as a Colombian company, whose corporate purpose is to provide engineering and related services, including: environmental consulting, environmental technology, environmental monitoring, water engineering and project management. In the Industrial, Oil & Gas, Infrastructure and electrical sectors.

- **PHYSICAL ADDRESS:** Race 36 No. 36-26
- **CONTACT E-MAIL:** info@k2ingenieria.com
- **WEB PAGE:** <https://www.k2ingenieria.com/>
- **PHONE:** 607 - 6352870

2. AIM

This Policy establishes the general guidelines for the protection and processing of personal data within the Company, thus allowing us to strengthen the level of trust between the person responsible and the Owners in relation to the processing of their information; Inform the Owners of the purposes and transfers to which their personal data are subjected and the mechanisms and forms for the exercise of their rights.

3. SCOPE

This Personal Data Treatment and Protection Policy will be applied to all databases and/or files that include personal data that are subject to processing by K2 INGENIERIA SAS as responsible for the processing of personal data.

4. DEFINITIONS

- **Habeas Data:** The right of every person to know, update and rectify the information that has been collected about them in files and data banks of a public or private nature.
- **Personal information:** Any information linked or that can be associated with one or more specific or determinable natural persons.
- **Database:** Organized set of personal data that is subject to processing.

- **Treatment:**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 Owner to carry out the processing of personal data.
- **Notice of Privacy:**It is the physical, electronic document or in any other format known or unknown, which is made available to the Owner in order to inform about the processing of their personal data.
- **Headline:**Natural person whose personal data is processed
- **assignee:**Person who, by succession or transmission, acquires the rights of another person.
- **Responsible for Treatment:**Natural or legal person, public or private, who alone or in association with others, decides on the database and/or the processing of data.
- **Treatment Manager:**Natural or legal person, public or private, who, by themselves or in association with others, processes personal data on behalf of the person responsible for the treatment.

5. GUIDING PRINCIPLES APPLICABLE TO PERSONAL DATA

In terms of personal data protection, the following guiding principles will apply:

a) Principle of legality in matters of data processing:The treatment referred to in the Habeas Data Law is a regulated activity that must be subject to what is established therein and the other provisions that develop it.

b) Purpose principle:The treatment must obey a legitimate purpose in accordance with the Constitution and the law, which must be informed to the Owner.

c) Principle of freedom:The treatment can only be carried out with the prior, express and informed consent of the Owner. Personal data may not be obtained or disclosed without prior authorization, or in the absence of a legal or judicial mandate that requires consent.

d) Principle of truth or quality:The information subject to processing must be true, complete, accurate, up-to-date, verifiable and understandable. The processing of partial, incomplete, fragmented or misleading data is prohibited.

e) Transparency principle:In the processing, the right of the Owner to obtain from the data controller or the Data Processor, at any time and without restrictions, information about the existence of data that concerns him or her must be guaranteed.

f) Principle of restricted access and circulation:The processing is subject to the limits derived from the nature of the personal data, the provisions of the law and the Constitution. In this sense, the treatment can only be carried out by people authorized by the Owner and/or by the people provided for by law.

Personal data, except public information, may not be available on the Internet or other means of dissemination or mass communication, unless access is

technically controllable to provide knowledge restricted only to the Owners or authorized third parties in accordance with the law.

g) Safety principle: The information subject to processing by the data controller or Data Processor referred to in the Habeas Data Law must be handled with the technical, human and administrative measures that are necessary to provide security to the records, avoiding their adulteration, loss, unauthorized or fraudulent consultation, use or access.

h) Confidentiality principle: All persons involved in the processing of personal data that are not public in nature are obliged to guarantee the confidentiality of the information, even after their relationship with any of the tasks included in the processing has ended, and may only supply or communicate of personal data when this corresponds to the development of activities authorized by law and in its terms.

6. RIGHTS OF THE OWNERS

The holders of personal data will enjoy the following rights, and those granted to them by law:

- a)** Know, update and rectify your personal data in front of the person responsible for the treatment or those in charge of the treatment. This right may be exercised, among others, against partial, inaccurate, incomplete, fragmented, misleading data, or data whose processing is expressly prohibited or has not been authorized;
- b)** Request proof of the authorization granted to the person responsible for the treatment except when it is expressly excepted as a requirement for the treatment, in accordance with the provisions of article 10 of the law;
- c)** Be informed by the data controller or the Data Processor, upon request, regarding the use that has been given to your personal data;
- d)** Submit complaints to the Superintendency of Industry and Commerce for violations of the provisions of the law and other regulations that modify, add or complement it;
- e)** Revoke the authorization and/or request the deletion of the data when the processing does not respect the constitutional and legal principles, rights and guarantees. The revocation and/or deletion will proceed when the Superintendence of Industry and Commerce has determined that in the processing the person responsible or in charge has engaged in conduct contrary to the law and the Constitution;
- f)** Free access to your personal data that has been processed.

7. AUTHORIZATION OF THE OWNER OF PERSONAL DATA

Without prejudice to the exceptions provided for in Statutory Law 1581 of 2012, as a general rule in the processing of personal data K2 INGENIERIA SAS, will collect prior and informed authorization from the Owner, which may be obtained by any means that may be subject to for later consultation.

7.1 Events in which authorization is not necessary

The authorization of the Owner will not be necessary when it comes to:

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

8. HOMEWORK OF K2 ENGINEERING SAS AS RESPONSIBLE OF THE PROCESSING OF PERSONAL DATA

K2 INGENIERIA SAS, As the person responsible for the processing of personal data, you will fulfill the following duties:

- a) Guarantee to the Holder, at all times, the full and effective exercise of the right of habeas data.
- b) Request and keep, under the conditions provided by law, a copy of the respective authorization granted by the Owner.
- c) Duly inform the Owner about the purpose of the collection and the rights granted to him by virtue of the authorization granted.
- d) Preserve the information under the security conditions necessary to prevent its adulteration, loss, consultation, use or unauthorized or fraudulent access.
- e) Guarantee that the information provided to the Data Processor is true, complete, accurate, updated, verifiable and understandable.
- f) Update the information, communicating in a timely manner to the Data Processor, all the news regarding the data that you have previously provided and adopt the other necessary measures so that the information provided to it remains updated.
- g) Rectify the information when it is incorrect and communicate the pertinent information to the Data Processor.
- h) Provide the Data Processor, as the case may be, only data whose processing is previously authorized in accordance with the provisions of the law.
- i) Demand that the Data Processor at all times respect the security and privacy conditions of the Owner's information.
- j) Process queries and claims made in the terms indicated in Statutory Law 1581 of 2012.
- k) Adopt an internal manual of policies and procedures to guarantee adequate compliance with the law and, especially, to respond to queries and complaints.

- l) Inform the Data Processor when certain information is under discussion by the Owner, once the claim has been submitted and the respective process has not been completed.
- m) Inform at the request of the Owner about the use given to their data.
- n) Inform the data protection authority when violations of security codes occur and there are risks in the administration of the Owners' information.
- o) Comply with the instructions and requirements issued by the Superintendency of Industry and Commerce.

9. POLICIES SPECIFIC FOR THE TREATMENT OF PERSONAL INFORMATION.

9.1 Processing of personal data of Employees

K2 INGENIERIA SAS collects the personal data of its Workers, which are classified by the company as confidential, and will only be revealed by the company with the express authorization of the owner or when a Competent Authority requests it.

The purposes for which the personal data of the company's employees are used will be:

- a) Comply with the obligations imposed by Colombian labor law on employers, or the orders issued by the competent Colombian or foreign authorities;
- b) Issue certifications related to the relationship of the data owner with the company.
- c) Comply with the obligations imposed on the company as an employer, in relation to Occupational Health and Safety standards, and the so-called Occupational Health and Safety Management System (SG-SST).
- d) Manage the functions carried out by workers.
- e) Consult memos or calls for attention.
- f) Develop and apply the disciplinary process.
- g) Contact family members in emergency cases.
- h) Carry out control, monitoring and evaluation of workers.
- i) Protect confidential and proprietary company materials.
- j) Take photographic images and fingerprints necessary for the recognition of the worker.
- k) Take photographic images and make audiovisual pieces within the framework of the company's marketing and advertising campaigns.
- l) Third parties with which the Company maintains a professional relationship of applicants, suppliers, collaborators, investee companies, partners or Consortiums, to the extent that it physically travels to the facilities of said third parties, with the sole purpose of allowing them to manage the control and coordination regarding the personnel who are going to provide

effective services derived from the professional relationship, as well as enabling compliance with legal obligations, in tax and social security matters.

- m) Travel agencies, transport companies, hotels and vehicle rental entities, communication of identifying data for the management of reservations and settlement of expenses incurred.
- n) International transfer of data to countries that provide protection similar to that of Colombia.
- o) When the company carries out mergers, divisions, due diligence, quality accreditations or certifications, internal or external corporate audits, assignments of contracts.

K2 INGENIERIA SAS stores the personal data of its employees, including those obtained during the selection process, and keeps them in a folder identified with the name of each of them.

This folder will only be accessed and processed by the Human Management Area, with the purpose of managing the contractual relationship between K2 INGENIERIA SAS and the employee.

K2 INGENIERIA SAS processes Sensitive Personal Data of its workers such as fingerprints through biometric control with the sole purpose of controlling entry to the company's facilities and providing safe work environments. For the purposes of this Treatment, the respective authorization is collected, which in any case will be express and optional, clearly indicating the Sensitive Personal Data subject to Processing and the purpose thereof.

Likewise, it will have high security systems for the management of sensitive data and its reservation, with the understanding that such sensitive data will only be used by K2 INGENIERIA SAS, for the aforementioned purposes.

Once the employment relationship has ended, K2 INGENIERIA SAS will proceed to store all the personal data obtained from the selection process and the documentation generated in the development of the employment relationship, in a central file with restricted access, subjecting the information to measures and measures at all times. adequate security levels, given that employment information may contain sensitive data.

In any case, the information will not be processed for a period of more than twenty (20) years from the termination of the employment relationship, or in accordance with the legal or contractual circumstances that make the handling of the information necessary.

9.2 Processing of personal data of candidates or applicants for selection processes and personnel for tenders:

K2 INGENIERIA SAS collects the personal data of its applicants and stores them in a database which is classified by the company as confidential, and will only be revealed with the express authorization of the owner or when a Competent Authority requests it.

The purposes for which the personal data of applicants are used **K2 ENGINEERING SAS**, they will be:

- a) Carrying out procedures for the personnel selection process.
- b) Sending communications scheduled by the company, to carry out different selection tests.
- c) Corroborate any requirement that arises in the development of the selection process
- d) General connection of each applicant or bidding staff.

In any case, the information will not be processed for a period longer than the duration of the applicant's relationship with the company, and the additional time required in accordance with the legal or contractual circumstances that make the handling of the information necessary. .

9.3 Processing of personal data of Clients:

K2 INGENIERIA SAS collects the personal data of its Clients and stores them in a database which is classified by the company as reserved, and will only be revealed with the express authorization of the owner or when a Competent Authority requests it.

The purposes for which the personal data of K2 INGENIERIA SAS Clients are used will be:

- e) For commercial purposes
- f) Process of control and accounting registration of obligations contracted with clients.
- g) Compliance with tax and legal aspects with public and regulatory entities.
- h) Control and payments for services provided;
- i) Consultations, audits and reviews derived from the business relationship with the supplier.
- j) Compliance with contractual obligations, for which the information may be transferred to third parties, such as financial entities, notaries, OFAC and terrorism lists, lawyers, etc.
- k) Compliance with judicial decisions and administrative and legal, fiscal and regulatory provisions.
- l) Transmission of information and personal data in audit processes.
- m) Billing

- n) management for the pre-contractual, contractual and post-contractual stages.
- o) Sending invitations to events scheduled by the company.
- p) Corroborate any requirement that arises in the development of the concluded contract.
- q) Comply with the purpose of the contract entered into, including services delivery activities, compliance and processing of guarantees, among others.
- r) Verify cases in which there is non-compliance by any of the parties.
- s) General linkage of each client.
- t) Carry out customer loyalty activities and marketing operations.

In any case, the information will not be processed for a period greater than the duration of the client's relationship with the company, and the additional time required in accordance with the legal or contractual circumstances that make the handling of the information necessary. .

9.4 Processing of personal data of Suppliers and contractors.

K2 ENGINEERING SAS collects the personal data of its Suppliers and contractors, stores them in a database which, although it is made up mostly of public data, is classified by the company as reserve, and which, in the case of private data, only the will be revealed by the company with the express authorization of the owner or when a Competent Authority requests it.

The purposes for which the personal data of the Service Providers are used **K2 INGENIERIA SAS**, they will be:

- a. Carry out evaluations and selection of potential suppliers.
- b. Compliance with tax and legal aspects with public and regulatory entities
- c. Establish business relationships to acquire goods or services
- d. Control and payments for goods and services received.
- e. Qualitative and quantitative evaluations of service levels received from suppliers.
- f. Communication of Policies and procedures on how to do business with suppliers.
- g. Process of control and accounting registration of obligations contracted with suppliers.
- h. Consultations, audits and reviews derived from the business relationship with the supplier.
- i. Sending invitations to contract and carrying out procedures for the pre-contractual, contractual and post-contractual stages.
- j. Sending invitations to events scheduled by the Company or its affiliates.
- k. The others specifically established in the authorizations granted by the suppliers themselves.

K2 ENGINEERING SAS It will only collect from its suppliers and contractors the data that is necessary, relevant and not excessive for the purposes of selection, evaluation and execution of the contract that may arise.

The collection of personal data of employees of suppliers and contractors by K2 INGENIERÍA SAS will in all cases have the purpose of verifying the suitability and competence of the employees; that is, once this requirement has been verified, K2 INGENIERÍA SAS, will return such information to the Provider, except when its retention is expressly authorized.

In any case, the information will not be processed for a period greater than the duration of the relationship between the Supplier and contractors with the company, and the additional time required in accordance with the legal or contractual circumstances that make it necessary to handle the information. information.

9.5 Processing of personal data of Third Parties

K2 ENGINEERING SAS collects the personal data of its Third Parties and stores them in a database which is classified by the company as reserved, and will only be revealed with the express authorization of the owner or when a Competent Authority requests it.

The purposes for which the personal data of the Third Parties of K2 INGENIERÍA SAS are used will be:

- a) Project management and contractual relationships.
- b) Sending invitations to events scheduled by the company.
- c) Corroborate any requirement that arises in the development of the concluded contract.
- d) Comply with the purpose of the contract entered into, including services delivery activities, compliance and processing of guarantees, among others.
- e) Verify cases in which there is non-compliance by any of the parties.
- f) General linkage of each third party.
- g) Carry out third-party loyalty activities and marketing operations.

In any case, the information will not be processed for a period longer than the duration of the third party's relationship with the company, and the additional time required in accordance with the legal or contractual circumstances that make the handling of the information necessary. .

9.6 Processing of personal data of Visitors at Entry Control

K2 ENGINEERING SAS, collects the personal data of its visitors and stores them in a database which is classified by the company as reserve, and will only be

revealed by the company with the express authorization of the owner or when a Competent Authority requests it.

The purposes for which the personal data of those who enter the K2 INGENIERÍA SAS facilities are used will be:

- a) Ensure entry to the company facilities to people who have authorization for free transit and restrict passage to those who are not authorized.
- b) Guarantee security in monitored environments.
- c) Allow adequate work environments for the safe development of activities within the company.
- d) Comply with the obligations stipulated within the Occupational Health and Safety Management System.

In any case, the information will not be processed for a period exceeding one (1) year from its collection in accordance with the legal or contractual circumstances that make the handling of the information necessary.

9.7 Processing of personal data from Video Surveillance Registry

K2 ENGINEERING SAS collects biometric data from its workers and visitors through its Surveillance Cameras and stores them in a database which is classified by the company as reserve, and will only be revealed with the express authorization of the owner or when a Competent Authority so requires. I requested.

The purposes for which the personal data contained in the K2 INGENIERÍA SAS Surveillance Cameras are used will be:

- a) Guarantee safety in work environments.
- b) Allow adequate work environments for the safe development of the company's work activities.
- c) Control the entry, stay and exit of employees and contractors in the company's facilities.

To comply with the duty of information that corresponds to K2 INGENIERÍA SAS as administrator of personal data, the company will implement Privacy Notices in the areas where images that involve processing of personal data are captured.

In any case, the information will not be processed for a period of more than fifteen (15) days from its collection in accordance with the legal or contractual circumstances that make the handling of the information necessary.

10. TRANSFER AND TRANSMISSION OF PERSONAL INFORMATION

The company currently does not carry out international data transfer, however, it carries out international transmission of personal data related to the worker database through document management software whose servers are located in Spain, the above, with the purpose of Documentally manage all contractual and post-contractual processes concluded with them. In any case, in addition to having the express and unequivocal authorization from the Owner, K2 INGENIERIA SAS will ensure that the action provides adequate levels of data protection and meets the requirements established in Colombia by Statutory Law 1581 of 2012. and its regulatory decrees. On the other hand, when K2 INGENIERÍA SAS decides to carry out International Data Transfer, it may do so without authorization from the owners, as long as it guarantees the security of the information, confidentiality and the conditions that regulate the scope of data processing, in accordance with the article 10 of Law 1581 of 2012

DATA OF BOYS, GIRLS AND ADOLESCENTS

K2 ENGINEERING SAS, does not directly process personal data of minors; However, in particular, the company collects and processes the personal data of the minor children of its workers, with the sole purpose of complying with the obligations imposed by law on employers in relation to affiliations with the social security system. and parafiscal, and in particular to allow the enjoyment of children's fundamental rights to health, recreation and the right to family.

In any case, K2 INGENIERÍA SAS will collect, when appropriate, the respective authorization from its legal representatives for its treatment, always keeping in mind the best interests of the minor and respect for the prevailing rights of children and adolescents.

11. PROCEDURE FOR ATTENDING CONSULTATIONS, CLAIMS AND PETITIONS, AND MECHANISMS TO EXERCISE THE RIGHTS OF THE OWNERS

The Owner, his successors, his representative and/or attorney-in-fact, or whoever is determined by stipulation in favor of another; You may exercise your rights by contacting us through written communication addressed to the area in charge of personal data protection in the company, that is, to the LEGAL department. The communication may be sent to the following email: protecciondedatos@k2ingenieria.com or through written communication filed

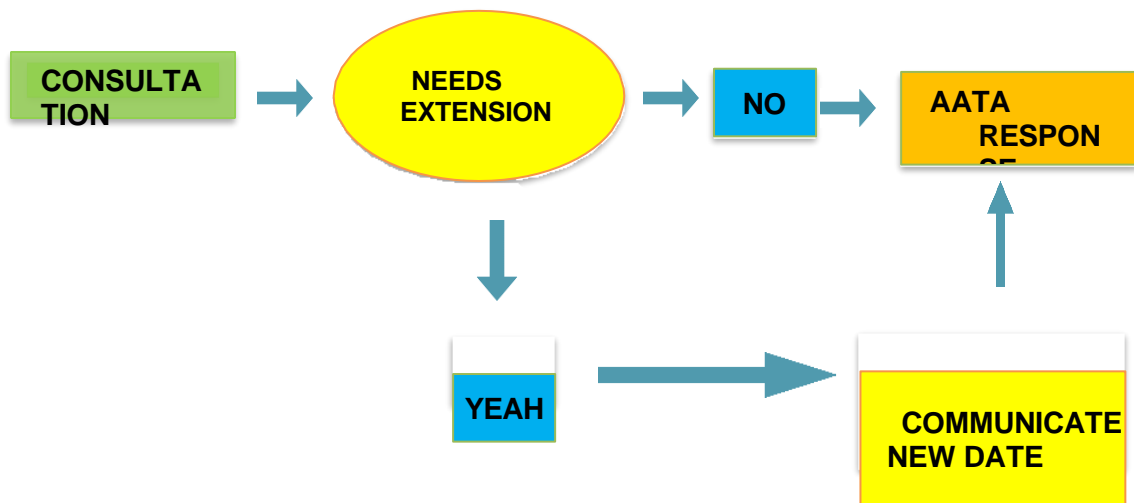
in the Carrera 36 No. 36-26 El Prado neighborhood of the city of Bucaramanga (S).

11.1 Consultations

The personal information of the Owner that resides in the K2 INGENIERÍA SAS databases may be consulted, and the company will be responsible for providing all the information contained in the individual registration or that is linked to the applicant's identification.

The query, once received by the company, will be attended to within a maximum period of **ten (10) business days** counted from the date of receipt thereof.

When it is not possible to attend to the query within said term, the interested party will be informed, expressing the reasons for the delay and indicating the new date on which such query will be attended, which in no case may exceed the following five (5) business days. at the expiration of the first term.



11.2 Claims

When it is considered that the information contained in a K2 INGENIERÍA SAS database must be corrected, updated or deleted, or when the alleged non-compliance with any of the duties contained in the Habeas Data Law is noted, claim before K2 INGENIERÍA SAS, which will be processed under the following rules:

The claim will be made through written communication addressed to K2 INGENIERÍA SAS with the identification of the Owner, the description of the facts that give rise to the claim, the address, and accompanying the documents that you want to assert.

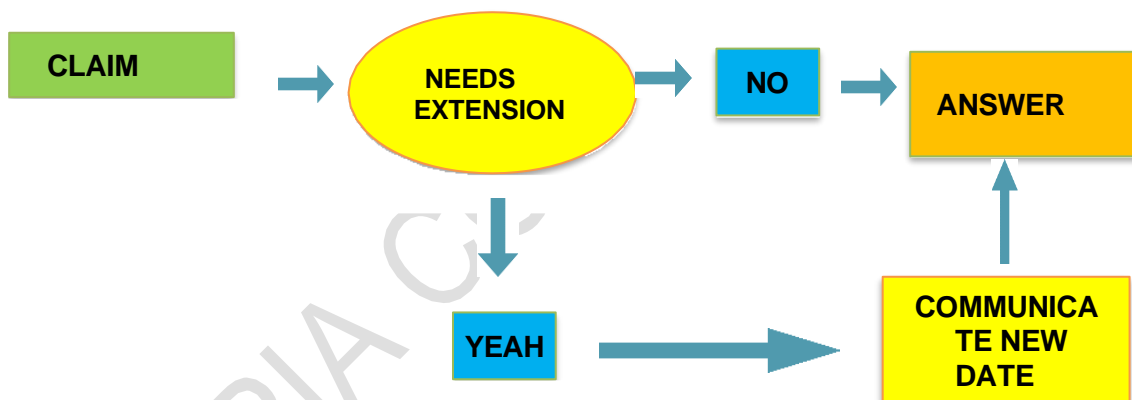
If the claim is incomplete, the interested party will be required within five (5) days following receipt of the claim to correct the deficiencies. Two (2) months have passed since the date of the request, without the applicant presenting the information

requested, it will be understood that you have withdrawn the claim.

In the event that K2 INGENIERÍA SAS receives a Claim for which it is not competent to resolve, the company will notify the person who actually corresponds within a maximum period of two (2) business days and will inform the Owner.

Once the complete claim is received, the company will include in the respective database a legend that says "claim in process" and the reason for it, within a period of no more than two (2) business days. The company will keep said legend in the data under discussion until the claim is decided.

The maximum term to address the claim will be fifteen (15) business days counted from the day following the date of receipt. When it is not possible to attend to the claim within said term, the company will inform the Owner of the reasons for the delay and the new date on which their claim will be attended to, which in no case may exceed eight (8) business days following the expiration of the first term.



MINIMUM CONTENT OF THE APPLICATION

The requests submitted by the owner in order to make a query or claim about the use and management of their personal data must contain minimum specifications, in order to provide the owner with a clear and consistent response to what is requested. The application requirements are:

- a. Be directed to K2 INGENIERÍA SAS
- b. Contain the identification of the Owner (Name and Identification Document).
- c. Contain the description of the facts that motivate the query or claim.
- d. The object of the request.
- e. Indicate the notification address of the Owner, physical and/or electronic (e-mail).
- f. Attach the documents that you want to assert. (Especially for claims)

In the event that the query or claim is presented in person, the Owner must put his request or claim in writing without any formality other than the requirements demanded in the previous point.

11.3 Procedural requirement

The Owner, his successors, his representative and/or attorney-in-fact, or whoever is determined by stipulation in favor of another; You may only file a complaint with the Superintendency of Industry and Commerce for the exercise of your rights once you have exhausted the Consultation or Claim process directly with the company.

11.4 Request for update and/or rectification

K2 ENGINEERING SAS, will rectify and update, at the request of the owner, the information that is inaccurate or incomplete, in accordance with the procedure and terms indicated above, for which the Owner 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 the documentation that supports such request.

12. Revocation of authorization and/or deletion of Data

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

Likewise, the Owner has the right to request K2 INGENIERÍA at any time.

SAS the deletion or elimination of your personal data when:

- a) Consider that they are not being treated in accordance with the principles, duties and obligations provided for in current regulations.
- b) They are no longer necessary or relevant for the purpose for which they were obtained.
- c) The time necessary to fulfill the purposes for which they were obtained has elapsed.

Such deletion implies the elimination, either in whole or in part, of the personal information, in accordance with what is requested by the owner in the records, files, databases or treatments carried out by K2 INGENIERÍA SAS.

The right of cancellation is not absolute and therefore K2 INGENIERÍA SAS may deny revocation of authorization or deletion of personal data in the following cases:

- a) The owner has a legal or contractual duty to remain in the database.

- b) The deletion of data hinders judicial or administrative actions linked to tax obligations, the investigation and prosecution of crimes or the updating of administrative sanctions.
- c) 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.

13. MODIFICATION OF POLICIES

K2 ENGINEERING SAS, reserves the right to modify the Personal Data Treatment and Protection Policy at any time. However, any modification will be communicated in a timely manner to the owners of the personal data through the company's website and/or the usual means of contact ten (10) business days prior to its entry into force.

In the event that an owner does not agree with the new General or special Policy and with valid reasons that constitute a just cause for not continuing with the authorization for the processing of personal data, the Owner may request the company to withdraw of their information through the channels indicated in Chapter 12. However, the Owners may not request the withdrawal of their personal data when the company has a legal or contractual duty to process the data.

14. IGENCY

The policy has been applied since August sixteenth (16), 2016 and this update since October 19, 2023.

15. RECORD CONTROL

CODE	RECORD	RESPONSIBLE
FOO102-07	Authorization for the processing of personal data	Responsible and in charge of the treatment

16. HISTORY OF CHANGES

CHANGE CONTROL CHART		
Version	Date	Change Description
01	08/16/2016	Initial Issue
02	09/01/2021	Update: 2 Regulatory framework 3. Includes Scope 6. Data controller 7. Processor
03	2023-10-19	The policy is updated under the guidelines of the parent company, and it is delegated as the area in charge of data processing to the company's legal department.

COPIA CONTROLADA