CCLA

CCLA

PERSONAL DATA PROCESSING POLICY OF CCLA COLOMBIA S.A.S

DATE	VERSION
August 2026	First version

TABLE OF CONTENTS

TABLE OF CONTENTS	**1**
1- INTRODUCTION	**2**
2- DEFINITIONS	**2**
3- PRINCIPLES	**3**
4- INFORMATION OF THE DATA CONTROLLER	**5**
5- PROCESSING AND PURPOSES	**5**
6- RIGHTS OF THE DATA SUBJECTS	**9**
7- AREA IN CHARGE OF HANDLING INQUIRIES, PETITIONS, AND CLAIMS FROM DATA SUBJECTS	**10**
8- PROCEDURES FOR INQUIRIES AND CLAIMS	**11**
9- INFORMATION SECURITY	**12**
10- VALIDITY PERIOD OF THE DATABASES	**13**
11- EFFECTIVE DATE	**13**

Personal Data Processing Policy of CCLA Colombia S.A.S, first version.

1- INTRODUCTION

At CCLA COLOMBIA S.A.S., ("CCLA Colombia," the "Company," or the "Controller") we recognize the importance of the security, privacy, and confidentiality of personal information. This Personal Data Processing Policy (hereinafter, the "Policy") describes the Personal Data that is collected, the manner in which the Company processes Personal Data, how Data Subjects can contact the Company and exercise their rights, among others.

In general, all information provided by the Data Subjects, or that CCLA Colombia otherwise collects in the ordinary course of its business, will be processed in accordance with Law 1581 of 2012, Decree 1377 of 2013 (compiled in Decree 1074 of 2015) and other applicable regulations on data protection.

2- DEFINITIONS

The following definitions shall be taken into account for the interpretation of this Policy:

a) Database: An organized set of personal data that is subject to Processing.

b) Personal Data: Any information linked or that can be associated with one or more identified or identifiable natural persons.

c) Sensitive Data. Data that may affect the Data Subject's privacy or whose improper use may lead to discrimination, such as biometric data, health-related data, and data that reveals racial or ethnic origin, political orientation, religious or philosophical beliefs, membership in trade unions, social or human rights organizations, or that promotes the interests of any political party or guarantees the rights and guarantees of opposition political parties, as well as data related to sexual life.

d) **Data Processor or Processor:** Natural or legal person, public or private, that by itself or in association with others, carries out the Processing of personal data on behalf of the Data Controller.

e) **Applicable Law:** Law 1581 of 2012, Decree 1377 of 2013 (compiled in Decree 1074 of 2015), Title V of the Single Circular of the Superintendence of Industry and Commerce, and other applicable regulations regarding data protection in Colombia.

f) **Personal Data Processing Policy or Policy:** Refers to this document, as the Personal Data Processing Policy applied by the Company in accordance with the guidelines of the current legislation on the matter.

g) **Data Controller or Controller:** Natural or legal person, public or private, that by itself or in association with others, decides on the database and/or the Processing of the data.

h) **Data Subject:** Natural person whose personal data are subject to processing.

i) **Transmission:** Processing of Personal Data carried out by the Processor on behalf of the Controller, which implies the communication or sending of Personal Data within or outside of Colombian territory.

j) **Processing:** Any operation or set of operations performed on Personal Data, such as the collection, storage, use, circulation, or deletion of Personal Data.

k) **Processing:** Any operation or set of operations on personal data, such as collection, storage, use, circulation, or deletion.

3- PRINCIPLES

In order to correctly comply with the Applicable Law, when CCLA Colombia carries out the Processing of Personal Data, it shall be governed by the following principles:

- **Principle of legality:** The Processing of Personal Data is an activity that must be subject to the provisions established in the regulations governing the matter.
- **Principle of purpose:** The Processing must serve 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 a legal or judicial mandate that waives

consent.

- **Principle of veracity or quality:** The information subject to Processing must be truthful, complete, accurate, updated, verifiable, and understandable. The Processing of partial, incomplete, fragmented data, or data that may lead to error, is prohibited.
- **Principle of transparency:** In the Processing, the right of the Data Subject must be guaranteed to obtain from the Data Controller or the Data Processor, at any time and without restrictions, information about the existence of data concerning them.
- **Principle of restricted access and circulation:** The Processing is subject to the limits derived from the nature of the Personal Data and the applicable law.
- **Principle of security:** The information subject to Processing by the Data Controller or Data Processor referred to in this law must be handled with the necessary technical, human, and administrative measures to provide security to the records, preventing their alteration, loss, consultation, use, or unauthorized or fraudulent access.
- **Principle of confidentiality:** All persons who are involved in the Processing of personal data that are not public in nature are

obligated to guarantee the confidentiality of the information, including after the termination of their relationship with any of the tasks that the Processing comprises, being able to only supply or communicate personal data when it corresponds to the development of the activities authorized in this law and in the terms thereof.

- **Principle of accountability:** When collecting and carrying out the Processing of Personal Data, CCLA Colombia will implement appropriate and effective measures to comply with the obligations established by the applicable Law.

4- INFORMATION OF THE DATA CONTROLLER

- Corporate Name: CCLA Colombia S.A.S.
- NIT: 901087745 - 0
- Address: Calle 91 No 11-29 Floor 4, Bogotá
- Email: datospersonales@cclagroup.com
- Telephone: 601 6661494

5- PROCESSING AND PURPOSES

CCLA Colombia acknowledges that the Data Subject has the right to a reasonable expectation of privacy, taking into account, in all cases, their responsibilities, rights, and obligations with the Company. By virtue of the relationship established between CCLA Colombia and the Data Subject, we inform that the Personal Data subject to collection, use, updating, circulation, transmission, transfer, suppression, and, in general, any form of Processing thereof, will be processed in accordance with the purposes previously informed to the Data Subject, which shall, in any case, correspond to the development of its corporate purpose and the ordinary course of its commercial activities.

1. General Purposes:

The purposes described below will be applicable to all Data Subjects who have previously, expressly, and in an informed manner authorized the Processing of their Personal Data:

- The registration of personal information in the systems of CCLA Colombia.
- The payment of contractual obligations.
- The Transmission and Transfer of Personal Data in compliance with the legal guarantees applicable to each of these operations.
- The sending of information to governmental or judicial entities upon their express request.
- Support in external or internal; national or international audit processes.
- The collection of data for the fulfillment of the duties that, as Data Controller, correspond to CCLA Colombia.
- Informing about substantial changes in the Policy adopted by CCLA Colombia.
- Establishing and managing the pre-contractual and contractual commercial, labor, civil, and any other type of relationship that arises by virtue of the fulfillment of a legal or contractual obligation of CCLA Colombia.
- Responding to the petitions, inquiries, claims, and/or complaints made by the Data Subjects through any of the channels enabled by the Controller for said purpose.
- Sending relevant information derived from the relationship held with the Controller.
- Any other purpose that results from the relationship between the Personal Data Subject and CCLA Colombia or from the authorization given by the Data Subject.
- The control and prevention of fraud and money laundering, including, but not limited to, the consultation of restrictive lists, and all the necessary information required for SAGRILAFT.

6

Personal Data Processing Policy of CCLA Colombia S.A.S, first version.

2. Employees and/or Candidates:

CCLA Colombia will use the Personal Data of its employees for the following purposes:

- To incorporate their Personal Data into the employment contract, its modifications, and addenda, as well as into other documents that may be necessary to manage the employment relationship and obligations derived from it that are the responsibility of CCLA Colombia as the Controller for the Processing of Personal Data.
- To correctly manage the employment relationship that links the Data Subject to CCLA Colombia.
- To use the Personal Data of collaborators to properly incorporate them into CCLA Colombia's active and historical employment files and to keep them updated.
- To send internal communications, whether or not related to their employment.
- To administer Personal Data so that CCLA Colombia, as an employer, correctly complies with its obligations. For example: processing the affiliations to which the employee is entitled by law with the comprehensive social security system, family compensation funds, and other

matters related to social benefits, contributions, withholdings, taxes, labor disputes, as well as in the case of contributions or payments to other entities where the collaborator has previously authorized the processing of their Personal Data.

- To manage the Personal Data of the Data Subject and their family unit, for which it has a legal basis to process, in order to carry out affiliation procedures with health promotion entities -EPS-, family compensation funds, labor risk administrators -ARL-, and others necessary for CCLA Colombia to fulfill its duty as an employer.

CCLA

- Respond to employee requests for the issuance of certificates, records, and other documents requested from CCLA Colombia by reason of the employment relationship.
- Manage their Personal Data to ensure the correct assignment of work tools (including IT tools such as email, computers, mobile devices, access to databases, etc.).
- Manage their Personal Data to ensure the correct execution of the provisions of the Internal Work Regulations, including the relevant disciplinary processes and investigations.
- Administer the Personal Data to make the correct payment of the payroll, including making deductions for payments to third parties that the employee has previously authorized and preparing the reports related to this process.

3. Suppliers, Investors, and/or Clients:

The Controller will use the Personal Data of suppliers and/or contractors who are natural persons, as well as the personnel of its suppliers and/or contractors when these are legal entities, in accordance with the purposes listed below:

- Develop proper management of the contractual relationship.
- Collect, record, and update their Personal Data for the purpose of informing, communicating, organizing, controlling, attending to, and accrediting activities in relation to their status as a supplier and/or third party related to CCLA Colombia and other associated procedures under the responsibility of CCLA Colombia.
- Manage the Personal Data to carry out the different payment processes for invoices and collection accounts submitted to CCLA Colombia and manage collections that are their responsibility.
- Evaluate the services offered or provided by the supplier and/or contractor.

- Comply with any other legal obligation that is the responsibility of CCLA Colombia.
- Analyze financial, technical, and any other aspects that allow the Controller to identify the provider's compliance capacity.
- Fulfill the obligations arising from the commercial relationship established with the provider or contractor.

- Provide assistance and/or information of general and/or commercial interest to the provider or contractor.
- Develop and apply processes for selection, evaluation, preparation of responses to a request for information, preparation of requests for quotation and proposals, and/or award of contracts.
- Evaluate the quality of the products and services offered or provided to CCLA Colombia.
- Use, when necessary, the Personal Data of the provider's employee in order to establish access controls to the logical or physical infrastructure of CCLA Colombia.
- Administer the Personal Data to make payments to providers, including the administration of bank account numbers for the correct management of payments.
- Send or provide information to the competent authorities, when they so request, or in the course of contractual disputes.
- Transfer information to administrative authorities that, by reason of their functions, require it in order to comply with the legal obligations of CCLA Colombia.

6- RIGHTS OF THE PERSONAL DATA SUBJECTS

Data Subjects may exercise the right of *habeas data* before CCLA Colombia for the purpose of:

9

Personal Data Processing Policy of CCLA Colombia S.A.S, first version.

- To know, update, and rectify your Personal Data before the Data Controller or Data Processor. This right may be exercised, among others, with respect to partial, inaccurate, incomplete, fragmented data that may lead to error, or data whose Processing is expressly prohibited or has not been authorized.
- To request proof of the authorization granted to the Data Controller, except when it is expressly exempted as a requirement for the Processing.
- To be informed by the Data Controller or the Data Processor, upon request, regarding the use that has been made of your Personal Data.
- To file complaints with the Superintendence of Industry and Commerce for violations of the provisions of the applicable Law and other regulations that modify, add to, or complement it.
- To revoke the authorization and/or request the deletion of Personal Data when the principles, rights, and constitutional and legal guarantees are not respected in the Processing.
- To access, free of charge, your Personal Data that has been subject to Processing.

7- AREA IN CHARGE OF HANDLING INQUIRIES, PETITIONS, AND CLAIMS FROM DATA SUBJECTS

The area in charge of handling inquiries, petitions, and claims, and in general, overseeing compliance with the applicable Law within CCLA Colombia is the Compliance Department, through its Chief Compliance Officer and the team designated by them. Data Subjects may exercise their rights through verbal communication, by filing a written communication, and/or by sending an email, through any of the following contact channels:

- Address: Calle 91 No 11- 29 Piso 4, Bogotá

- Telephone: 601 6661494.
- Email: datospersonales@cclagroup.com

8- PROCEDURES FOR INQUIRIES AND CLAIMS

Inquiries

Data Subjects or their successors-in-interest may consult the personal information of the Data Subject that is held in any database, whether public or private. The Data Controller or Data Processor must provide them with all the information contained in the individual record or that is linked to the identification of the Data Subject. The inquiry shall be formulated through the means enabled by the Data Controller or Data Processor, provided that proof thereof can be maintained. The inquiry shall be addressed within a maximum term of ten (10) business days from the date of its receipt. When it is not possible to address the inquiry within said term, the interested party shall be informed, stating the reasons for the delay and indicating the date on which their inquiry will be addressed, which in no case may exceed five (5) business days following the expiration of the first term.

Claims

The Data Subject or their successors-in-interest who consider that the information contained in a database should be subject to correction, updating, or suppression, or when they notice the alleged breach of any of the duties contained in this law, may file a claim with the Data Controller or the Data Processor, which will be processed under the following rules:

1. The claim shall be formulated by means of a request addressed to the Data Controller or the Data Processor, with the identification of the Data Subject, a description of the facts giving rise to the claim, the address, and accompanied by the documents intended to be enforced.
2. If the claim is incomplete, the interested party will be required to remedy the deficiencies within five (5) days following the receipt of the claim. After two (2) months have elapsed from the date of the request, without the

applicant submits the required information, it shall be understood that the claim has been withdrawn.

(iii) In the event that the person who receives the claim is not competent to resolve it, they shall forward it to the corresponding party within a maximum term of two (2) business days and shall inform the interested party of the situation.

(iv) Once the complete claim has been received, a legend stating "claim in process" and the reason for it shall be included in the database within a period not exceeding two (2) business days. Said legend must be maintained until the claim has been decided.

(v) The maximum term to address the claim shall be fifteen (15) business days, counted from the day following the date of its receipt. When it is not possible to address the claim within said term, the interested party shall be informed of the reasons for the delay and the date on which

their claim will be addressed, which in no case may exceed the eight (8) business days following the expiration of the first term.

9- INFORMATION SECURITY

In developing the principle of security contemplated in Law 1581 of 2012, CCLA Colombia has adopted and incorporated into its different processes the necessary and appropriate technical, human, and administrative measures to grant security to records with personal information, preventing their adulteration, loss, consultation, use, or unauthorized or fraudulent access. The personnel who carry out the Processing of Personal Data will execute the protocols established by CCLA Colombia in order to guarantee the security of the information. The foregoing is in accordance with the state of the art of technology, the type and nature of the data found in the Databases, and the risks to which they are exposed.

The Personal Data that CCLA Colombia obtains through any format, contract, or physical or electronic communication will be treated with complete secrecy and confidentiality, committing to maintain due secrecy with respect to them.

12

Personal Data Processing Policy of CCLA Colombia S.A.S, first version.

them and guaranteeing the duty to store them by adopting the necessary measures to prevent their alteration, loss, and unauthorized Treatment or access, in accordance with the provisions of the applicable Law.

10- VALIDITY PERIOD OF THE DATABASES

CCLA Colombia may only carry out the Treatment of Personal Data for the time that is reasonable and necessary, in accordance with the purposes that justified the Treatment, attending to the applicable provisions for the matter in question and to the administrative, accounting, tax, legal, and historical aspects of the information.

Once the purpose for the Treatment is fulfilled, the Personal Data will be deleted from the Company's files, unless there is a legal or contractual duty that requires them to be kept in its Databases.

11- EFFECTIVE DATE

This Policy became effective on August 01, 2026.

13

Personal Data Treatment Policy of CCLA Colombia S.A.S, first version.