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PERSONAL DATA PROCESSING POLICY

OF CCLA DEVELOPMENT COLOMBIA S.A.S.

DATE	VERSION
August 2026	First version

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1- INTRODUCTION

At CCLA DEVELOPMENT COLOMBIA S.A.S. ("CCLA Development", 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 Development 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 regarding data protection.

2- DEFINITIONS

For the interpretation of this Policy, the following definitions shall be taken into account:

- **Database:** organized set of Personal Data subject to Processing.
- **Personal Data:** any information linked or that can be associated with a specific or identifiable natural person.
- **Sensitive Data:** all data that affects the privacy of the Data Subject or whose improper use may lead to their discrimination, such as data that reveals racial or ethnic origin, Political orientation, religious or philosophical convictions, membership in 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 health, sexual life, and biometric data.
- **Processor:** natural or legal person, public or private, who by themselves or in association with others, carries out the Processing of Personal Data on behalf of the Controller of the Processing.

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- **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 on the matter of data protection in Colombia.
- **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.
- **Controller**: natural or legal person, public or private, who by themselves or in association with others, decides on the Database and/or the Processing of Personal Data.
- **Processing**: any physical or automated operation or procedure that allows for the capture, registration, reproduction, conservation, organization, modification, or transmission of personal data.
- **Data Subject**: is the natural person whose Personal Data are subject to Processing by the Controller, whether a client, provider, employee, or any third party who, by reason of a legal or commercial relationship, provides Personal Data to the Company.
- **Transmission**: refers to the communication of Personal Data by the Controller to a Processor, located within or outside the national territory, so that the Processor, on behalf of the Controller, processes Personal Data.
- **Transfer**: takes place when the Controller and/or Processor of the Personal Data sends the information or Personal Data to a recipient, who in turn is a Controller of the Processing and is located inside or outside the country.

3- PRINCIPLES

In order to ensure proper compliance with the Applicable Law, when CCLA Development 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 of the regulations that govern the matter.

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- **Principle of purpose limitation:** The Processing must comply with a legitimate purpose in accordance with the Constitution and applicable Law, which must be informed to the Data Subject through the means provided for by regulation.
- **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 the need for consent.
- **Principle of truthfulness or quality:** The information subject to Processing must be truthful, complete, exact, up-to-date, verifiable, and understandable. CCLA Development must refrain from Processing partial, incomplete, fragmented, or misleading data.
- **Principle of transparency:** In the Processing, the right of the Data Subject must be guaranteed to obtain from the Controller or the Processor, at any time and without restrictions, information about the existence of data concerning them, in accordance with the rules that regulate this access.
- **Principle of restricted access and circulation:** Processing may only be carried out by persons authorized by the Data Subject and/or by the persons provided for in the applicable law, for which the Company must take the necessary actions to obtain the corresponding authorization from the Data Subject when necessary.
- **Principle of security:** The information subject to Processing by CCLA Development as Controller or Processor must be managed with the necessary technical, human, and administrative measures to provide security to the data, preventing its adulteration, loss, consultation, use, or unauthorized or fraudulent access.
- **Principle of confidentiality:** All CCLA Development Personnel and others who are involved in the Processing of Personal Data on behalf of and representing the Company are obliged to guarantee the confidentiality of the information.
- **Principle of accountability:** When collecting and carrying out the Processing of Personal Data, CCLA Development will implement appropriate and effective measures to comply with the obligations established by the applicable Law.

4- INFORMATION OF THE DATA CONTROLLER

- Company Name: CCLA Development Colombia S.A.S.
- NIT: 901204179-4
- Address: Calle 91 No 11-29 Piso 4, Bogotá
- Email: datospersonales@cclagroup.com
- Telephone: 601 6661494

5- PROCESSING AND PURPOSES

CCLA Development recognizes that the Data Subject has the right to a reasonable expectation of privacy, taking into account, in any case, their responsibilities, rights, and obligations to the Company. By virtue of the relationship established between CCLA Development 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 following purposes, which will be previously informed to the Data Subject, corresponding, in any case, 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 informedly authorized the Processing of their Personal Data:

- The registration of personal information in CCLA Development's systems.
- The payment of contractual obligations.
- 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.

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- Support in external or internal audit processes; national or international.
- The collection of data for the fulfillment of the duties that, as Controller of Personal Data, correspond to CCLA Development.
- Informing about substantial changes in the Policy adopted by CCLA Development.
- Establishing and managing the pre-contractual and contractual relationship, whether commercial, labor, civil or of any other nature, that arises by virtue of the fulfillment of a legal or contractual obligation of CCLA Development.
- Responding to the petitions, inquiries, claims and/or complaints made by the Data Subjects through any of the channels enabled by the Controller for this purpose.
- Sending relevant information derived from the relationship maintained with the Controller.
- Any other purpose that results from the relationship between the Data Subject of the Personal Data and CCLA Development or from the authorization given by the Data Subject.
- The control and prevention of fraud and money laundering, including, but not limited to, consulting restrictive lists, and all the information necessary required for SAGRILAFT.
- Controlling access and guaranteeing security in the Company's facilities by means of video surveillance systems.

2. Designers and Technicians:

- Registration in CCLA Development's databases as an authorized designer and/or technician of the company.

- Developing proper management of the contractual relationship.
- Collecting, recording, and updating their Personal Data for the purpose of informing, communicating, organizing, controlling, attending to, and accrediting activities in relation to their status as a designer or technician related to CCLA Development.

3. Human Resources:

CCLA Development will use the Personal Data of its employees, candidates, and collaborators in accordance with the purposes listed below:

- Carry out admission processes.
- Incorporate their Personal Data into the employment contract, its modifications and additions, as well as in other documents that may be necessary to manage the employment relationship and its derived obligations that are the responsibility of CCLA Development as the Controller of the Processing of Personal Data.
- Develop proper management of the employment relationship that links the Data Subject with CCLA Development.
- Use the Personal Data of collaborators to properly incorporate them into CCLA Development's active and historical employment files and to keep them updated.
- Evaluate the quality of the services offered by the employee.
- Conduct internal studies on employee habits for wellness programs.
- Send the information via secure means to other companies where, for contingency purposes, there are "back-ups" or information backups.
- Send internal communications related or unrelated to their employment relationship.
- Administer the Personal Data so that CCLA Development, as an employer, correctly complies with its obligations. For example: processing the affiliations to which the employee is entitled by law before 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.
- Manage the Personal Data of the Data Subject and their family unit which it is legitimized to process in order to carry out affiliation procedures with entities.

health promotion entities -EPS-, family compensation funds, occupational risk administrators -ARL-, and others necessary for CCLA Development to fulfill its duty as an employer.

- Respond to worker requests regarding the issuance of certificates, records, and other documents requested from CCLA Development by reason of the employment relationship and even after the employment relationship has ended.
- 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 disciplinary processes and relevant investigations.
- Administer Personal Data to make the correct payroll payment, including making deductions for payments to third parties that the employee has previously authorized and preparing the reports related to this process.

4. Suppliers, Contractors, and Clients:

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

- Develop a correct management of the contractual relationship.
- Collect, register, 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 Development and other associated procedures under the responsibility of CCLA Development.
- Manage the Personal Data to carry out the different payment processes for invoices and collection accounts submitted to CCLA Development and the management of collections for which they are responsible, which involves sending communications in this regard.

- Evaluate the services offered or provided by the supplier and/or contractor.
- Comply with any other legal obligation for which CCLA Development is responsible.
- Analyze financial, technical, and any other aspects that allow the Controller to identify the supplier's capacity to comply.
- Fulfill the obligations arising from the commercial relationship established with the supplier, contractor, or client.
- Provide assistance and/or information of general and/or commercial interest to the supplier or contractor.
- Develop and apply processes for selection, evaluation, preparation of responses to a request for information, preparation of requests for quotation and proposal, and/or awarding of contracts.
- Evaluate the quality of the products and services offered or provided to CCLA Development.
- Use, should it be necessary, the Personal Data of the employee of the supplier, contractor, or client for the purpose of establishing access controls to the logical or physical infrastructure of CCLA Development.
- Manage Personal Data to make payments to suppliers or contractors, including the management of bank account numbers for the proper management of payments.
- Send or provide information to the competent authorities, when they so request, or in the course of contractual disputes.
- Consult, validate, rectify, and report to information bureaus and/or operators the financial, commercial, and credit data, as well as restrictive lists and judicial records of our clients/suppliers, in accordance with the provisions of the Law.

- Carry out registration processes in the Company's systems for accounting, financial, and marketing purposes.
- Transfer information to administrative authorities that, by reason of their functions, so require it for the purpose of complying with the legal obligations of CCLA Development.

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- Send communications of interest.

CCLA Development understands that the Personal Data of the provider, contractor, or client, and that of third parties supplied by the provider, contractor, or client, such as authorized workers to carry out the assigned management or service, commercial references, and certifications, have the authorization of the respective Data Subjects to be delivered and processed in accordance with the purposes contemplated in this Policy.

6- RIGHTS OF THE PERSONAL DATA SUBJECTS

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

- To know, update, and rectify their 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 their Personal Data.
- To file complaints with the Superintendency of Industry and Commerce for infringements of the provisions of the applicable Law and other regulations that modify, add to, or supplement it.
- To revoke the authorization and/or request the deletion of the Personal Data when the constitutional and legal principles, rights, and guarantees are not respected in the Processing.
- To access, free of charge, their Personal Data that has been subject to Processing.

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7- AREA RESPONSIBLE FOR HANDLING INQUIRIES, PETITIONS, AND CLAIMS FROM DATA SUBJECTS

The area responsible for handling inquiries, petitions, and claims, and in general for overseeing compliance with the applicable Law within CCLA Development is the Compliance Department, through its Chief Compliance Officer and the team designated by said officer. 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

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

8- PROCEDURES FOR INQUIRIES AND CLAIMS

Inquiries: Data Subjects who wish to make inquiries should be aware that CCLA Development, as Data Controller, will provide such persons with all information contained in the individual record or that is linked to the Data Subject's identification. The inquiry shall be made through the channels enabled by CCLA Development and will be addressed within a maximum term of ten (10) business days from the date of receipt of the request. When it is not possible to address the inquiry within said term, the interested party will 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, without prejudice to the provisions contained in special laws or regulations issued by the National Government that may establish shorter terms, depending on the nature of the Personal Data.

Claims: A Data Subject who considers that the information contained in a CCLA Development Database must be subject to correction, updating, or suppression, or who becomes aware of the alleged breach of any of the duties contained

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in the applicable Law, you may file a claim with CCLA Development or the Data Processor, which will be processed under the following rules:

(i) The claim shall be made by means of a request addressed to the Data Controller or the Data Processor, with the identification of the Data Subject, the description of the facts giving rise to the claim, and the address, accompanied by the documents you wish to assert.

(ii) If the claim is incomplete, the interested party will be required within five (5) days following receipt of the claim to remedy the deficiencies. If two (2) months have passed since the date of the request without the applicant providing the required information, it shall be understood that they have withdrawn the claim.

(iii) In the event that the party who receives the claim is not competent to resolve it, it will be forwarded to the corresponding party within a maximum period of two (2) business days, and the interested party will be informed of the situation.

(iv) Once the complete claim is received, a notation stating "claim in process" and the reasons for it will be included in the Database within a period no longer than two (2) business days. This notation must be maintained until the claim is substantively resolved.

(v) The maximum term to address the claim will 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 will be informed of the reasons for the delay and the date on which their claim will be addressed, which in no case may exceed eight (8) business days following the expiration of the initial term.

9- SECURITY AND CONFIDENTIALITY OF PERSONAL DATA

In developing the security principle set forth in Law 1581 of 2012, CCLA Development has adopted and incorporated into its various processes the measures

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necessary and adequate technical, human, and administrative measures to provide security to the records with personal information, preventing their alteration, loss, consultation, use, or unauthorized or fraudulent access. The personnel who carry out the Processing of Personal Data shall execute the protocols established by CCLA Development in order to guarantee the security of the information. The foregoing is in accordance with the state of the 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 Development obtains through any format, contract, physical or electronic communication, will be treated with complete secrecy and confidentiality, committing to keep due secrecy regarding them and guaranteeing the duty to store them by adopting necessary measures to prevent their alteration, loss, and unauthorized Processing or access, in accordance with the provisions of the applicable Law.

10- VALIDITY PERIOD OF THE DATABASE

CCLA Development may only carry out the Processing of Personal Data for the time that is reasonable and necessary, in accordance with the purposes that justified the Processing, taking into account the applicable provisions on the matter in question and the administrative, accounting, tax, legal, and historical aspects of the information.

Once the purpose for the Processing has been fulfilled, the Personal Data will be eliminated from the Company's files, unless there is a legal or contractual duty that requires it to keep them in its Databases.

11- EFFECTIVE DATE

This Policy entered into force on August 01, 2026.

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