

# Personal Data Treatment Policy





## Personal Data Treatment Policy

Version 1.0

## I. Objectives of the Personal Data Treatment Policy

CERTIFICADORA DE CARBONO S.A.S. (hereinafter “**CERCARBONO**” or the “Company”), a company incorporated in Colombia, as Responsible for Personal Data Treatment, is committed to the Personal Data security of its users, clients, suppliers, shareholders, employees, and general public. And to fully comply with current regulations about Personal Data protection in Colombia and at the international level, here represents its Personal Data Treatment Policy (hereinafter the “Policy”).

In this policy, **CERCARBONO** details the general corporate guidelines applied to protect the Owners' Personal Data as a purpose of collecting the Information, the rights of the Owners, the area responsible for handling questions and complaints, as well as the procedures to be applied when acquiring, updating, correcting, or deleting the Information.

The policy will apply to all Personal Data Treatment carried out by **CERCARBONO** with respect to its employees, representatives, agents, shareholders, clients, and contractors, and, as applicable, any third parties with whom an agreement is made for the performance of any activity related with or involving Personal Data Treatment within the territory of the Republic of Columbia, or at the international level, and covers all orders whose Personal Data are treated as a result of our relationship with the company, regardless of whether that Treatment is carried out by the company or by third parties that have been commissioned for that purpose.

**CERCARBONO**, in compliance with the right of Habeas Data, only collects Personal Data when the Owner has given their authorization in advance. For that purpose, the company implements clear steps to protect the confidentiality and privacy of Personal Data to prevent unauthorized or fraudulent changes, losses, queries, use, or access to Personal Information.

## II. Definitions Applicable to the Data Part of the Treatment

The following terms shall have the meanings defined below:

- (a) **Personal Datum:** An Information related to the can be associated with one or several identified or identifiable individuals.
- (b) **Public Datum:** This is a datum that is not semi-private or private. Public Data includes, among others, Data about the individual's civil status, their profession or trade, their status as businesspeople or civil servants, and the contents, among others, of public records, public documents, official gazettes or publications, and court rulings.
- (c) **Sensitive Datum:** Any Data that affects the Owner's intimacy or whose improper use could lead to discrimination.
- (d) **Person in Charge of Data Treatment:** This is the individual or legal entity, whether public or private, whole, directly, or together with others, performs the Personal Data Treatment process under the Party Responsible for Treatment.
- (e) **Policy for Personal Data Protection:** This refers to this document.

- (f) **Party Responsible for the Treatment:** Individual or legal entity, whether public or private, who directly or with others, makes decisions about the Database or Data Treatment. In this case, this is **CERCARBONO**.
- (g) **Owner:** Individual whose Personal Data is subject to Treatment .
- (h) **Transfer:** Data transfer takes place when the party responsible or in charge for Personal Data Treatment, who is located in Colombia, sends the Personal Data to an addressee who is, in turn, responsible for the Treatment and is located inside or outside the country.
- (i) **Transmission:** Personal Data Treatment involving the communication to third party involving communicating the Data to a third party located inside or outside the territory of the Republic of Columbia, when the communication is to be used for Treatment by the party in charge on behalf and for the purposes of the responsible party.
- (j) **Treatment:** Any operational Grupo operations performed on the Personal Data, such as collecting, storing, using, circulating, or deleting Personal Data.

### III. Authorization

Collecting, storing, using, circulating, or deleting Personal Data by **CERCARBONO** requires the free, prior, express, and informed consent of the Data Owner.

When collecting Personal Data, **CERCARBONO** will ask the Owners for authorization, informing them about the specific purpose of the Treatment for which such consent is being obtained.

**CERCARBONO** will only treat Sensitive Data when the Owner has given their authorization, except when it is not required under the law. In any event, the company will not impose any condition on the delivery of Sensitive Data.

The Owner's authorization may be given: (i) in writing, (ii) verbally, or (iii) through unequivocal actions that make it possible to reasonably conclude that such authorization was granted.

Thus, the authorization may be a physical, electronic, Data message, Internet, or website document, or in any other format that can be verified later, or through an appropriate technical or technological mechanism that makes it possible to express or obtain consent via a click or double-click which, if the Owner had not performed such an action, the Data would not have been captured and stored in the Database. The authorization will be created by **CERCARBONO** and will be made available to the Owner in advance, and prior to Treatment of their Personal Data.

**CERCARBONO** will keep evidence of these authorizations in an appropriate manner, following the principles of Information confidentiality and privacy.

## IV. Purpose of Data Treatment

**CERCARBONO**, in furthering its corporate objective and its relations with third parties, whether clients, users, employees, suppliers, creditors, shareholders, visitors, and others, is constantly collecting Data for various purposes and uses, which may include the following ones, and which are expressly authorized by accepting this Policy:

1. Collecting Personal Information and include and store it in the company's Databases.
2. Use the Personal Data provided for its communication, disclosure, and promotion campaigns, or to offer products, activities or services developed as part of **CERCARBONO's** internal strategies.
3. Using Personal Information for internal administrative or commercial purposes such as preparing and submitting bids, commercial references about experience, market research, statistical analysis, satisfaction surveys, offering or recognizing benefits in loyalty or after-sales services.
4. Keep historical records in the company and keep in contact with the Personal Data Owners.
5. Verify, check, or validate the Personal Data provided.
6. Study and analyze the Information provided to follow and improve products, services, and care.
7. Deliver the Information collected to third parties with whom the company enters into contracts for Personal Data storage and administration, following the security and confidentiality standards they must follow under the law.
8. Submit the Information about changes, news, bulletins, education fora, advertising, or marketing, or tele-sales, using media such as email, push notifications, text messages (SMS), product or service offers found in the web page and the application.
9. Store, hold, manage, and use the Information for fraud control and prevention, and money laundering and terrorist financing prevention and control.
10. Asset management, development, and use.
11. Prepare market studies to determine consumer preferences, or market survey to check the prices of a specific product or service needed by **CERCARBONO**.
12. Enter into commercial agreements, or hold institutional events or programs, wither directly or with third parties.
13. Report about new products or services or changes thereto.
14. Send through the post, or email, to social networks or mobile devises, via text messages (SMS and/or MMS) or through any other current or future communication medium, institutional, advertising, or commercial Information about the company's products or services or those of its business partners, or about projects in which the company participates.
15. Carry out processes to learn about potential clients, or to update the company's Information about its clients or users.

16. To interact with its suppliers, to verify compliance with its legal obligations to its employees, and for invitations to events organized or sponsored by **CERCARBONO**, inter alia.
17. Check the balances of its debtors/creditors.
18. Provide, share, send, or deliver its Personal Data to insurance companies, legal counsel, tax authorities, subcontractors who process, manage, or use the Information, when such companies need the Information for the purposes indicated herein, and maintain the obligation of confidentiality therefor.
19. Comply with the legal obligation of reporting to administrative bodies and the competent authorities, as required.
20. Share with any third parties who work together with **CERCARBONO** and who, to perform their duties must have access to the Information, such as courier service providers, advertising agencies, or collections agencies.
21. Query and report obligations to credit bureaus.
22. Ensure the security and proper operation of the physical areas where **CERCARBONO** carries out its main commercial activities.
23. Carry out the employee selection, assessment, and hiring process.
24. Perform the contracts entered into by **CERCARBONO**.
25. Support **CERCARBONO's** audit processes.
26. Record and control the participation of current and potential clients, suppliers, employees, third parties and, in general, those individuals who have a commercial or contractual relationship with the Company.
27. Control and prevent fraud, money laundering and terrorist financing.
28. Circulate the Information inside the Company.
29. Validate the Information to comply with the money laundering and terrorist financing obligations by **CERCARBONO** or third parties hired for that purpose.
30. Carry out commercial relations and activities with the stakeholders.
31. Share technical nonconfidential Information about the projects with the persons who collect Information in national and international carbon markets.
32. To spread Information, for participation in international seminars and congresses, to apply the national and international accreditation, business ranking companies, etc., which involve the presence of **CERCARBONO** in international fora.
33. Any other purpose arising from the implementation of business relationships or contracts that might arise between **CERCARBONO** and the Owners of the Information.

The Information provided by the Owner will only be used for the above purposes and, once the need for treating the Personal Data ceases, such Data may be deleted from **CERCARBONO's** Database or filed securely, to be disclosed only when required by law.

**CERCARBONO** collects from the Owners, Information about their Personal Data such as names, surnames, address, date of birth, telephone, identification document, email, employment Information, family Information, and academic training, among others. However, **CERCARBONO** may ask for the Personal Information it deems necessary for its

operations, which will be promptly reported by **CERCARBONO** no later than the time the Information is collected. All Personal Information collected may be stored and hosted in Colombia or overseas.

## V. Procedures for Personal Data Treatment

To protect and maintain the Owner's Personal Data confidentiality, **CERCARBONO** has defined the following procedure to learn about the Information that the Owner has in its Databases:

Whoever wishes to find out what Information **CERCARBONO** holds in its Databases, they should send a request to the following email: [info@cercarbono.com](mailto:info@cercarbono.com) or write to the following address: Calle 7 Sur 42-70 Oficina 1707, Medellín (Antioquia, Colombia), indicating that they wish to find out what Information **CERCARBONO** has about the Owner, and provide an address or email where the reply should be sent.

This communication must be signed by the (i) Owner, who must provide sufficient proof of their identity; (ii) the Owner's heirs or assignees who must provide proof thereof; (iii) the Owner's representative or attorney, after providing proof of their appointment, or (iv) through a stipulation for or in the name of another.

The area responsible will send a reply to the Owner or interest party within ten (10) business days after the date on which the request is received, to the email or physical address indicated in the request. In the event that it is not possible to meet the request within that timeframe, the interested party will be informed of the reasons for the delay, indicating the date on which the request will be met. In that case, the reply period will be extended for an additional five (5) business days.

There will be no charge for the Owner or interested party to review their Information, provided (i) this is done at least once per calendar year, or (ii) it is due to a significant change to this Information Treatment Policy.

Should the Information be reviewed with a greater frequency, **CERCARBONO** may charge the Owner for the shipping, reproduction, or certification, as appropriate, of any documents produced for the purpose.

### **Procedure to update, correct, or delete the Information:**

Owners or representatives of Personal Data may ask **CERCARBONO** to update, correct, or eliminate their Information, or revoke their authorization for Treatment by **CERCARBONO** by filing a claim via email, indicating the reasons for the request, the physical address or email where to send the reply, and the documents to be enforced.

If the claim is not complete, the petitioner will be asked, within five (5) business days after the claim is received, to correct the claim. If two (2) months after the request is sent the Information requested has not been provided, it will be deemed that the petitioner has desisted from the claim.

Should the person receiving the claim not be competent to resolved, it will be scaled to the appropriate level within two (2) business days and will notify the petitioner.

After the complete claim has been received, a statement will be included in the Database indicating “claim in progress” and the reason for the claim, within two (2) business days. The statement must be kept until the claim has been resolved.

The maximum time to resolve the claim will be fifteen (15) business days from the date it is received. In the event that it is not possible to resolve the claim within that time, the claimant will be notified indicating the reason for the delay and the date on which it will be, which will not be longer than eight (8) business days after the expiration of the first term.

It must be said that the request to delete Information and revocation of the authorization will not apply when the Owner is legally or contractually obliged to **CERCARBONO**.

## VI. Information and Mechanisms Established by Cercarbono as the Party Responsible for Data Treatment

<b>Company name</b>	Certificadora de Carbono S.A.S.
<b>Tax ID</b>	901.025.991-0
<b>Domicile</b>	Medellín, Antioquia, Colombia
<b>Address</b>	Calle 7 Sur 42-70 Oficina 1707
<b>Telephone</b>	+57 310 419 6327
<b>Email</b>	info@cercarbono.com
<b>Web page</b>	<a href="http://www.cercarbono.com">www.cercarbono.com</a>

Guarantees:

**CERCARBONO**, as the party responsible for Personal Data Treatment, provides the following guarantees:

1. That the Data being treated is stored under the best technological systems, appropriate technical and human measures to ensure that Data is not altered, lost, or improperly used by others.
2. That, using a virtual security system, **CERCARBONO** guarantees that the Information is preserved.
3. That, at any time, the Owner of the Information may request the deletion of the Personal Information or revoke their authorization, provided there is no legal or contractual obligation to retain the Information.

## VII. Rights of the Personal Data Owner

1. To know, update, and rectify their Personal Information through the Parties responsible Data treatment, or persons in charge thereof.



2. Ask the Party Responsible for Data Treatment for proof of the authorization, except when that is expressly exempted as a requirement for Treatment.
3. Be notified by the Party Responsible for Data Treatment or the party in charge thereof, about the use made of their Personal Data.
4. File with the Superintendence of Industry and Trade Colombia (Superintendencia de Industria y Comercio de Colombia) complaint for violations to the provisions of this Policy and other rules that amend, expand, or complement them.
5. Revoke the authorization or as for the deletion of Personal Information when the Treatment thereof violates the constitutional and legal principles, rights, and guarantees. Revocation or deletion will apply whenever the Superintendence of Industry and Trade finds that the party responsible for or in charge of Data Treatment, has violated this Policy or the Constitution.
6. Abstain from answering questions about Sensitive Data. The Owner has the option of whether or not to answer questions about Sensitive Data, or Data about boys, girls, or teenagers.
7. Get free access to the Personal Information that has been subjected to Treatment.

### **VIII. Duties of the Party Responsible for Treatment**

1. Guarantee the Owner, at all times, the full and effective right of habeas Data.
2. Request and keep, under the conditions established in this Policy, a copy of the authorization granted by the Owner.
3. Notify the Owner about the purpose for which the Information was collected, and the Owner's right under said authorization.
4. Keep the Information using the necessary security measures to prevent changes, or losses, or unauthorized or fraudulent use or access.
5. Ensure that the Information provided to the party in charge of Treatment is true, complete, accurate, up to date, verifiable, and understandable.
6. Update the Information by notifying the party in charge of Data Treatment, about all changes to the Personal Data that have been provided previously and take all necessary steps to keep up to date the Information that has been provided.
7. Correct the Information when it is incorrect and notify the party in charge of Treatment as appropriate.
8. Give the party in charge of Treatment, as appropriate, only the Personal Data whose Treatment has been approved, as provided in this Policy.
9. Demand that the party in charge of Treatment applies the Owner's Information security and privacy conditions at all times.
10. Process the queries and complaints as provided in this Policy.
11. Adopt an internal policies and procedures manual to guarantee that this Policy is followed, and especially, to handle queries and complaints.
12. Notify the party in charge of Treatment when some Information is being questioned by the Owner, after the complaint has been filed and the respective process has not been completed.

13. Notify the Owner, upon request, about how their Personal Data has been used.
14. Notify the Data protection authorities whenever the security codes are violated, and the management of the Owners' Information is at risk.
15. Follow the instructions and requirements of the Superintendence of Industry and Trade.

## **IX. International Use and Transfer of Personal Data and Information by Cercarbono**

In the pursuit of **CERCARBONO's** corporate objective, and to meet the permanent or occasional relationship between any Owner of Personal Information and **CERCARBONO**, the Company may transfer and transmit, even internationally, all of the Personal Data, provided the applicable requirements are followed and, therefore the Owners, by accepting this Policy, hereby expressly authorize the transferer and transmit their Personal Data, even internationally. The Data will be transferred for all the relationships that might be established with **CERCARBONO**.

For the international transfer of the Owners' Personal Data, **CERCARBONO** will take all the necessary steps so that the third parties are aware and agree to abide by this Policy, in the understanding that the Personal Information they receive may only be used for matters that are directly related to **CERCARBONO** and only for as long as such relationship lasts, and may not be used or intended for any other purpose. The international transfer of Personal Data, the provisions of Article 26, Law 1581 of 2012 will be applied.

International transmissions of Personal Data by **CERCARBONO**, need not be notified to the Owner nor require their consent whenever there is a Personal Data transmission agreement in force according to Article 25, Decree 1377 of 2013.

**CERCARBONO** may also exchange Personal Information with government or public authorities (including other judicial or administrative authorities, fiscal authorities, and criminal, civil, administrative, disciplinary, and fiscal authorities), and third parties involved in civil legal proceedings, and their accountants, auditors, attorneys, and other advisors and representatives, if it is necessary or appropriate: (a) to comply with applicable laws, including the laws in countries other than those of their country of residence; (b) to comply with legal processes; (c) to respond to the petitions by public and government authorities, other than those of their country of residence; (d) to enforce our terms and conditions; (e) to protect our operations; (f) to protect our, their, or third-party rights, privacy, security or property; and (g) to obtain any applicable compensation or limit any damages that could affect us.

## X. Duration of this Policy

**CERCARBONO's** Personal Data Treatment Policy is effective as of its publication.

The Personal Data subject to Treatment will remain in the Company's Database for the duration of the contractual agreement for the product or service, and according to the purposes established in this Policy.

The Company may change this Policy as necessary, at any time, without notifying the Owner of the Personal Data, provided such changes are not substantial. A substantial change, for this Policy, is defined, refers to a change to the purpose to the Treatment or the contact Information for the Party Responsible for Treatment.

CERCARBONO S.A.S.

## Document History

Version	Date	Comments/changes
1.0	18.12.2023	Initial version of the document.