

# PRIVACY AND DATA PROTECTION POLICIES

The **ALDOR GROUP, SAS** is made up of the companies: Comestibles Aldor SAS, Plásticos Especiales SAS, FRAI Inversiones SAS, Gesta SA y Cía. S en C, Gesta SA, CIM Comercial SAS, is committed to complying with Law 1581 of 2012 regarding the protection of personal data and considering Decree 1377 of June 27, 2013, has designed the data protection policy personal.

## 1. OBJECTIVE

Define the general guidelines for compliance with Law 1581 of 2012 that regulates the protection of personal data that governs Colombia.

## 2. REACH

This policy applies to all areas and/or people who have access to the information databases collected by the Aldor Group companies.

## 3. LEGAL FRAMEWORK

The information treatment policy is carried out in accordance with the Political Constitution of Colombia in its articles 15 and 20, Law 1581 of 2012 and Decree 1377 of 2013. Law 1581 of 2012, aims to "develop constitutional law that all people have to know, update and rectify the information that has been collected about them in databases or files, and the other rights, freedoms and constitutional guarantees referred to in article 15 of the Political Constitution; as well as the right to information enshrined in article 20 of the same".

## 4. DEFINITIONS

**Database:** Organized set of personal data that is subject to Treatment.

**Personal data:** Any information linked or that can be associated with one or several determined or determinable natural persons. **Treatment Manager :** Natural or legal person, public or private, that by itself or in association with others, performs the Processing of personal data on behalf of the Treatment Manager.

**Responsible for the Treatment:** Natural or legal person, public or private, that by itself or in association with others, decides on the database and/or the Treatment of the data.

**Authorization:** Prior, express and informed consent of the Owner to carry out the Processing of personal data. **Owner:** Natural person whose personal data is subject to Treatment.

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

**Privacy Notice:** Verbal or written communication generated by the Responsible Party, addressed to the Holder for the Processing of their personal data, through which they are informed about the existence of the Information Processing policies that will be applicable to them, the way to access to them and the purposes of the Treatment that is intended to be given to personal data.

# POLÍTICAS DE PRIVACIDAD Y PROTECCIÓN DE DATOS

**Public data:** It is the data that is not semi-private, private or sensitive. Public data is considered, among others, the data related to the marital status of people, their profession or trade and their quality as merchant or public servant. Due to its nature, public data may be contained, among others, in public records, public documents, official gazettes and bulletins, and duly executed court rulings that are not subject to confidentiality.

**Sensitive data:** Sensitive data is understood to be those that affect the privacy of the Owner or whose improper use may generate discrimination, such as those that reveal racial or ethnic origin, political orientation, religious or philosophical convictions, membership of unions, social organizations, of human rights or that promotes the interests of any political party or that guarantees the rights and guarantees of opposition political parties, as well as data related to health, sexual life, and biometric data.

**Transfer:** The transfer of data takes place when the person in charge and/or in charge of the processing of personal data, located in Colombia, sends the information or personal data to a recipient, who in turn is the person in charge of the treatment and is located inside or outside the country.

**Transmission:** Treatment of personal data that implies the communication of the same inside or outside the territory of the Republic of Colombia when its purpose is to carry out a Treatment by the Manager on behalf of the Responsible. Natural Person: Human person who exercises rights and fulfills duties in a personal capacity.

**Third Party:** Any legal or natural person other than the people who directly belong to the Aldor Group.

## 5. DEVELOPMENT OR CONTENT

### 5.1. GENERAL CONDITIONS

In order to comply with Law 1581 of 2012 on the protection of personal data, the following considerations must be taken into account:

- a. Any employee or area of one of the Aldor Group companies may be in charge of data processing at some point in their working life.
- b. The Group must be considered as a business unit and therefore is responsible for the processing of databases.
- c. Third parties that at any given time require access to the databases managed by the Aldor Group, are responsible
- d. The law is mandatory throughout the Colombian territory and to transmit the information from the databases to other countries, their legislation must contemplate security measures equal to or greater than those contained in Law 1581 of 2012.
- e. Databases are considered to be all information provided by natural persons, suppliers, customers, consumers, employees or any other person whose information is processed by The Aldor Group.

# POLÍTICAS DE PRIVACIDAD Y PROTECCIÓN DE DATOS

- F. It is not necessary to apply the policy by exception contemplated in the Law when:
- g. The databases and files have the purpose of national security and defense, as well as the prevention, detection, monitoring and control of money laundering and the financing of terrorism.
- h. The databases have as their purpose and contain intelligence and counterintelligence information.
- Yo. The databases and files that are of journalistic information and other editorial content.

## 5.2. SPECIFIC CONDITIONS

The following specific conditions must be taken into consideration:

- a. As of the effective date of this policy, any employee who begins a labor relationship with an Aldor Group company must have a clause in their employment contract that expresses the commitment to comply with Law 1581 of 2012 in the event of becoming Personal database manager.
- b. Text related to the obligation to comply with the law will be included in the internal work regulations to cover the entire current universe.
- c. Any third party that, due to a relationship with areas or companies of the Group, requires access to the databases, must be asked for a contractual clause expressing knowledge of the law and responsibility for compliance with it, and likewise, will require prior authorization by part of the owner to process your personal data.
- d. Any supplier, client or consumer whose information is stored in databases, as long as they are natural persons, must be asked for authorization in writing so that their data can be processed without restrictions. This must be for all effects that arise in our exercise.
- and. In the authorization cited in the previous paragraph, it must also leave
- F. All the databases that the areas and companies of the Group manage must have a recovery guarantee (Back up).
- g. In any case, restricted access to the databases must be maintained. When databases are sent by mass media, access to them must be regulated by a security key.
- h. Group companies must periodically promote campaigns to update their personal databases.
- Yo. For the treatment of personal databases, all areas that require it must have a written procedure that guarantees compliance with the policy and Law 1581 of 2012.
- j. All Group companies must have and comply with the procedure for the attention of complaints and/or claims, guaranteeing compliance with the law regarding this matter.

# POLÍTICAS DE PRIVACIDAD Y PROTECCIÓN DE DATOS

k. Clients, suppliers, collaborators, ex-collaborators and other natural persons who have provided personal data to the Aldor Group companies have the right to access, consult and know the personal data found in our database, as well as rectify them in case of being inaccurate or incomplete, and to cancel them when they decide. To make your rights effective, you can send a request to the email [proteccion.datos@plasticel.com](mailto:proteccion.datos@plasticel.com)

## 5.3. VALIDITY

This document is effective as of June 27, 2013 and until such time as it is expressly revoked or modified.

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