



INTERNAL MANUAL OF POLICIES

AND

PROCEDURES FOR THE

HANDLING OF PERSONAL DATA

COLOMBIAN ASSOCIATION OF SUGARCANE TECHNICIANS (TECNICAÑA)

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 www.tecnicana.org
 tecnicana@tecnicana.org
 Calle 38 Norte # 3CN-75 / Cali, Colombia
 Cel.: +57 (316) 8338724 / Fijo: +57 (602) 6653252



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INTRODUCTION

The Colombian Association of Sugar Cane Technicians of Colombia, identified by NIT 890.315.331-5, hereinafter referred to as TECNICAÑA, is located at Calle 38 Norte No. 3CN 75, Prados del Norte neighborhood, municipality of Cali-Valle. You can reach us via email at tecnicana@tecnicana.org, by phone at (602) 4078414, or on mobile at (+57) 316-5272976. In compliance with the provisions set forth in Law 1581 of 2012, its regulatory Decree 1377 of 2013, and Articles 15 and 20 of the Political Constitution of Colombia, we are informing our clients, collaborators, contractors and/or suppliers, employees, and all individuals who have provided or will provide their personal data to TECNICAÑA about the content of this manual. The manual aims to disclose the treatment and purpose to which the personal data contained in our databases will be subjected, the rights of the data Owners, the responsible party, and the procedure for addressing inquiries or complaints regarding the handling of personal data, among other matters.

Person in charge and responsible for the processing of personal data:

Name: THE COLOMBIAN ASSOCIATION OF SUGARCANE TECHNICIANS OF COLOMBIA.

TIN. 890.315.331-5

Address: Cali- Valle del Cauca

Address: Calle 38 Norte No. 3CN 75, Barrio Prados del Norte, Cali, Valle del Cauca

Telephone: (602) 4078414

E-mail: tecnicana@tecnicana.org

Website: www.tecnicana.org

GLOSSARY

In accordance with Law 1581 of 2012 and Regulatory Decree 1377 of 2013, TECNICAÑA provides the following definitions for the purposes of this manual

Authorization: Prior, express, and informed consent of the Data Owner to carry out the Processing of personal data.

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

Data Processor: A natural or legal person, whether public or private, that processes personal data on behalf of the Data Controller, either alone or in collaboration with others.

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

Data Processor: A natural or legal person, whether public or private, who alone or in association with others, processes personal data on behalf of the Data Controller.

Data Controller: A natural or legal person, whether public or private, who independently or jointly with others determines the purpose and means of processing personal data.

Data Owner: Refers to a natural person whose personal data is being processed.

Processing: Any operation or set of operations performed on personal data, including collection, storage, use, circulation, or deletion..

Privacy Notice: A verbal or written communication created by the Data Controller and directed to the Data Owner for the processing of their personal data. This notice informs the Data Owner about the relevant information processing policies, how to access them, and the purposes for processing their personal data.

Public data: It refers to information that is not semi-private, private, or sensitive. Examples of public data include data about individuals' civil status, profession or trade, and status as a businessperson or public official. This type of data can typically be found in public records, public documents, official gazettes, bulletins, and non-confidential judicial rulings.

Sensitive Data: Sensitive data refers to information that impacts the privacy of the data Owner or could potentially lead to discrimination if misused. This may include data revealing racial or ethnic origin, political beliefs, religious or philosophical affiliations, union membership, involvement in social or human rights organizations, or organizations supporting specific political parties. It also encompasses information relating to health, sexual life, and biometric data.

Transfer: A data transfer occurs when the data controller and/or data processor, located in Colombia, shares information or personal data with a recipient who is also a data controller, whether located inside or outside the country.

Transmission: This refers to the processing of personal data involving the communication of such data within or outside the territory of Colombia, with the intention of being processed by the data processor on behalf of the data controller.

Recording: Recording denotes the act of collecting or registering images, sounds, or data, usually using a device or machine such as a recorder, camcorder, or camera, and saving them on a specific medium for future playback.

Video Recordings: Video recordings encompass the technology used to record, process, store, and transmit images, allowing the reconstruction of moving scenes using digital or analog electronic methods.

Fingerprint: A fingerprint is the visible impression produced by the contact of the papillary ridges of a human finger on a specific surface.

Digital Fingerprint: This refers to the digitized collection of a fingerprint.

CHAPTER I

GENERAL PROVISIONS

ARTICLE 1. PURPOSE: The purpose of this Manual is to comply with the contents of Law 1581 of 2012, its Regulations, and Circulars of the Superintendence of Industry and Commerce. These regulations are aimed at developing the constitutional right of all individuals to know, update, and correct the information collected about them in databases or files, as well as other constitutional rights, freedoms, and guarantees. Additionally, it regulates the procedures for the collection, treatment, and processing of personal data carried out by



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TECNICAÑA, in order to guarantee and protect the constitutional rights provided for in articles 15 and 20 of the Political Constitution.

In this sense, TECNICAÑA's processing of personal data encompasses the collection, storage, use, circulation, deletion, and/or any other form of administration of personal data.

ARTICLE 2: SCOPE: This manual applies to the processing of personal data carried out by TECNICAÑA in the course of fulfilling its corporate purpose. The data Owners will be informed about the content of this manual, which contains the data processing policies managed by the company.

ARTICLE 3: APPLICABLE LEGISLATION. This manual is governed by the constitutional provisions related to the protection of personal data, as stated in Articles 15 and 20 of the Political Constitution, and in Statutory Law 1581 of 2012, which provides general provisions for the protection of personal data, as well as its regulatory decrees. Under these parameters, TECNICAÑA establishes its Policy for the Processing, Privacy, and Protection of Personal Data. This policy regulates the collection, storage, processing, administration, and security protocols for the protection of personal data. It also outlines the procedures for handling queries and claims by the Data Owners, among other aspects.

ARTICLE 4: PRINCIPLES The principles established in Article 4 of Law 1581 of 2012 will be harmoniously integrated in the development, interpretation, application, and implementation of this manual. These principles constitute the general parameters to be respected by TECNICAÑA in the processes of collecting, using, and processing personal data.

CHAPTER II:

AUTHORIZATION AND PURPOSE

ARTICLE 5: AUTHORIZATION. TECNICAÑA has established procedures to obtain permission from individuals to collect, store, use, share, or delete their personal data, in compliance with Article 9 of Law 1581 of 2012 and Article 5 of Regulatory Decree 1377 of 2013.

TECNICAÑA will implement the necessary procedures to obtain the consent of the data Owners, in accordance with article 20 of Decree 1377 of 2013, so that this consent can be referred to in the future.



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Authorization will be considered valid if it is expressed either (i) in writing, (ii) orally, or (iii) through clear actions by the data Owners that reasonably indicate consent has been given.

FIRST PARAGRAPH: TECNICAÑA will provide a physical means of obtaining authorization for the processing of personal data through a form included in Annex 1 of this document to secure explicit consent from the data owners.

On the other hand, TECNICAÑA will make the personal data processing policy contained in this handbook available on its website so that the public can access and familiarize themselves with it. TECNICAÑA recognizes that the continued relationship between the data Owner and the company will serve as a clear indication of the data Owner's acceptance of the data processing policy and authorization for TECNICAÑA to collect and process the data.

In this regard, TECNICAÑA will incorporate the necessary clauses and notices in its emails, contracts, service orders, and other documents to obtain authorization from data Owners for data processing and to make them aware of the current Manual of Policies for the Processing of Personal Data.

SECOND PARAGRAPH: VALIDITY OF AUTHORIZATION: The data owner acknowledges that the authorization will be valid from the moment it is granted or presumed to be granted, and for as long as it is reasonable and necessary, in accordance with the purposes justifying the processing, considering the applicable legal provisions and the administrative, accounting, fiscal, legal, and historical aspects of the information. Once the purposes of the processing have been fulfilled, and unless otherwise provided by legal norms, TECNICAÑA will proceed with the deletion of the personal data in its possession. However, personal data must be retained when required for compliance with a legal or contractual obligation, as stipulated in Article 11 of Decree 1377 of 2013.

Furthermore, the data owner's acceptance of data processing remedies any data processing carried out by TECNICAÑA prior to authorization.

The processing and purpose will also cover data collected prior to the publication of this data processing policy and data currently being processed.

ARTICLE 6. CASES WHERE AUTHORIZATION IS NOT REQUIRED. According to Article 10 of Law 1581 of 2012, authorization from the data owner is not required in the following cases: (i) Information requested by a public or administrative entity in the exercise of its legal functions or by court order. (ii) Publicly available data. (iii) Medical or health emergencies. (iv) Processing of information



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authorized by law for historical, statistical, or scientific purposes. (v) Data related to the Civil Registry of Individuals.

ARTICLE 7. AUTHORIZATION FOR SENSITIVE DATA. The processing of sensitive data is prohibited, except in cases expressly provided for in Article 6 of Law 1581 of 2012. If TECNICAÑA needs to collect and process sensitive data, it will inform the data owner at the time of collection that the data being provided is classified as sensitive. Additionally, TECNICAÑA will specify the purpose for which the data is being requested and inform the data owner of their right to withhold such data due to its sensitive nature.

PARAGRAPH. AUTHORIZATION FOR CHILDREN AND ADOLESCENTS: In accordance with Article 7 of Law 1581 of 2012, TECNICAÑA ensures the respect for the prevailing rights of children and adolescents. Therefore, the processing of personal data of children and adolescents is prohibited, except when it involves publicly available data and meets the parameters and requirements as specified in Article 12 of Decree 1377 of 2013.

1. Ensure that the processing responds to and respects the best interests of children and adolescents.
2. Respect the fundamental rights of children and adolescents.
3. Que When processing their data, consider the following factors to the extent possible:

Maturity

Autonomy.

Ability to understand the purpose of the processing

Explanation of the consequences of the processing.

After meeting the above requirements, the legal representative of the child or adolescent may grant authorization, after the minor has expressed their right to be heard. This opinion will be evaluated considering the minor's maturity, autonomy, and capacity to understand the matter. TECNICAÑA will ensure the proper use of data processing by applying the principles and obligations of Law 1581 of 2012.

ARTICLE 8. FORM AND MECHANISMS FOR GRANTING AUTHORIZATION. TECNICAÑA has prepared a document through which the data owner expresses their authorization, which will be provided to the data owner before the



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processing of their data. Authorization may be documented in physical, electronic, or any other format that allows for subsequent consultation.

Authorization by the data owner or their authorized representative will ensure that it is acknowledged that personal data will be collected, stored, and used for specified and informed purposes

Annex 1 of this document outlines the format for obtaining TECNICAÑA's authorization for the collection and processing of personal data. While Annex 1 provides a guide and model, authorization can also be obtained through other methods such as: a. quotations, b. sales invoices, c. marketing activities, d. events, e. property registries, f. service orders. g. digital media, h. email, etc.

PARAGRAPH. AUTHORIZATION FOR THE COLLECTION OF BIOMETRIC DATA. For security reasons, TECNICAÑA has opted to conduct continuous video recordings at its facilities. For data collected through this method, TECNICAÑA has placed notices in its premises informing data owners that they are being monitored by video cameras. The notices provide information on where to access the privacy policies and indicate that by publishing these notices, it will be understood that if the data owner continues their interactions with TECNICAÑA, this will constitute unequivocal conduct allowing us to conclude that the data owner is accepting the policies and granting authorization to TECNICAÑA for the collection and processing of personal data.

ARTICLE 9. PROOF OF AUTHORIZATION. In compliance with Article 9 of Law 1581 of 2012, TECNICAÑA will retain proof of the data processing authorization issued by the data owner so that it can be subject to subsequent consultation. To this end, TECNICAÑA will adopt the necessary measures to maintain records of when and how authorizations for the processing of personal data were obtained from the data owners.

ARTICLE 10. PRIVACY NOTICE. This is the physical, electronic or any other format document that is made available to the Data Owner to inform them that TECNICAÑA has information processing policies and that these will be applicable to them, as well as informing them how to access them.

The Privacy Notice, as expressly stipulated by Article 15 of Regulatory Decree 1377 of 2013, will include at a minimum: (i) The social data of TECNICAÑA; (ii) The means by which the data owner can contact TECNICAÑA; (iii) The methods by which the data owner can learn about the Information Processing Policies; (iv) The type of processing that will be given to the provided data and its purpose; and (v) The rights granted to the data owner and how to exercise them.



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PARAGRAPH. TECNICAÑA will keep the model Privacy Notice that it uses to inform Data Owners of the existence of the Information Processing Policies and how to access them. Annex 2 of this document contains the model privacy notice format defined by TECNICAÑA.

ARTICLE 11: PURPOSE OF DATA COLLECTION AND PROCESSING.

The collection and processing of personal data from data owners will be conducted for the following purposes:

CLIENTS

- Sending commercial, advertising, or promotional information about products and/or services, events, and/or promotions, including via physical mail, email, cell phones, or mobile devices, through text messages (SMS and/or MMS), or via any other analog and/or digital communication means, for the purpose of promoting, inviting, directing, executing, informing, and generally conducting commercial or advertising campaigns, promotions, or contests organized by the company.
- Sending information related to service reports, billing, payment receipts, and other documents related to commercial relationships.
- Performing commercial, statistical, risk, market, quality, interbank, and financial analyses and investigations, among others.
- Formalizing contracting processes and providing the service or delivering the purchased product.
- Carrying out administrative and financial tasks.
- Responding to requests from competent authorities.
- Fulfilling legal obligations related to document retention.
- Obtaining information about the data owner from credit information centers or financial, credit, commercial, and third-party databases as referred to in Law 1266 of 2008, and from judicial background databases, among others.
- Processing and responding to requests, complaints, and claims submitted by clients.
- Other purposes necessary for the development of the company's corporate purpose and the provision of its services.



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SUPPLIERS AND OTHERS

- To send commercial, advertising, or promotional information about products and/or services, events, and/or promotions, whether commercial or otherwise, via physical mail, email, cell phones, or mobile devices, including text messages (SMS and/or MMS), or through any other analog and/or digital communication means, with the aim of promoting, inviting, directing, executing, informing, and generally conducting commercial or advertising campaigns, promotions, or contests organized by the company.
- To send information related to service reports, billing, payment receipts, and other documents related to commercial relationships.
- To formalize contracting processes and monitor the provision of contracted services or the delivery of purchased products or supplies.
- To perform administrative and financial tasks related to commercial relationships.
- To respond to requests from competent authorities.
- To fulfill legal obligations related to document retention.
- To process and respond to requests, complaints, and claims submitted by suppliers.
- For other purposes necessary for the development of the company's corporate purpose and the provision of its services.

EMPLOYEES

- To develop the selection, evaluation, and hiring process.
- To manage employee and family data for matters related to compensation, contributions, obligations, benefits, taxes, and other necessary information (medical services, scholarships, training, etc.) required by the personnel management department.
- To manage internal communications.
- To oversee employee participation in corporate or social programs.
- To manage timekeeping, attendance, and physical access to facilities.
- To conduct performance evaluations, assessments, and training on skills, competencies, and employee safety.



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- To manage personal data for the proper allocation and use of assets and work tools.
- To receive requests, complaints, and claims from employees.
- To respond to requests from competent authorities.
- To fulfill legal obligations related to document retention
- For other purposes necessary for the development of the company's corporate purpose and its relationship with its employees.

CHAPTER III:

RIGHTS AND DUTIES

ARTICLE 12. RIGHTS OF DATA OWNERS. In accordance with Article 8 of Law 1581 of 2012, TECNICAÑA will inform data owners about the following rights as part of its compliance with the law:

- a) The right to know, update, and correct their personal data held by TECNICAÑA. This right can be exercised in relation to partial, inaccurate, incomplete, fragmented, misleading, or unauthorized data.
- b) The right to request proof of the authorization granted to TECNICAÑA, except when authorization is not required for data processing as per Article 10 of Law 1581 of 2012.
- c) The right to be informed by TECNICAÑA, upon request, about the use of their personal data.
- d) The right to lodge complaints with the Superintendence of Industry and Commerce for violations of the provisions of this law and other regulations that amend, add to, or complement it.
- e) The right to revoke authorization and/or request the deletion of data when the processing does not adhere to constitutional and legal principles, rights, and guarantees. Revocation and/or deletion will be applicable if the Superintendence of Industry and Commerce determines that TECNICAÑA has engaged in practices contrary to the Constitution and Law 1581 of 2012.
- f) To access their personal data that has been subject to processing free of charge.



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The aforementioned rights may be exercised directly by the data owner, their authorized representative, or, in the case of minors, their legal guardian or heirs, as applicable. In all cases, TECNICAÑA will ensure the security of the information by requesting proof of the data owner's identity or authorization to exercise these rights as provided by law.

FIRST PARAGRAPH. According to Article 9 of Decree 1377 of 2013, requests for data deletion and revocation of authorization will not be processed if the data owner has a legal or contractual obligation to remain in the database.

SECOND PARAGRAPH. TECNICAÑA will always recognize that personal data belongs to the individuals it pertains to, and only they can make decisions about it. TECNICAÑA will use such data only for purposes consented to by the data owner and authorized by law, while respecting all applicable data protection regulations.

ARTICLE 13. DUTIES OF TECNICAÑA AS DATA CONTROLLER AND PROCESSOR. In accordance with Articles 17 and 18 of Law 1581 of 2012, TECNICAÑA is committed to continuously fulfilling the following duties concerning personal data processing:

- a) To ensure at all times the full and effective exercise of the data Owner's habeas data rights;
- b) To request and retain, under the conditions stipulated by this law, a copy of the authorization granted by the data Owner;
- c) To adequately inform the data Owner about the purpose of data collection and the rights they have under the granted authorization;
- d) To maintain the information under necessary security conditions to prevent its alteration, loss, consultation, use, or unauthorized or fraudulent access;
- e) Ensure that the information provided to the Data Controller is true, complete, accurate, up to date, verifiable and comprehensible;
- f) Update the information by promptly notifying the Data Processor of any changes to the data previously provided and taking other necessary measures to ensure that the information supplied remains current;



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- g) Rectify any incorrect information and communicate the necessary corrections to the Data Processor;
- h) Provide the Data Processor only with data for which processing has been previously authorized in accordance with Law 1581 of 2012;
- i) Ensure that the Data Processor respects the security and privacy conditions of the data owner's information at all times;
- j) Process inquiries and complaints as specified in Law 1581 of 2012;
- k) Implement an internal manual of policies and procedures to ensure compliance with this law, particularly for handling inquiries and complaints from data owners;
- l) Inform the Data Processor when certain information is disputed by the data owner, once a complaint has been filed and the respective process is not yet concluded;
- m) Upon the data owner's request, provide information on how their data has been used;
- n) Notify the Superintendence of Industry and Commerce and/or the data protection authority of any breaches of security codes and risks in the management of data owner information.
- o) Comply with instructions and requirements issued by the Superintendence of Industry and Commerce.
- p) Maintain the information under necessary security conditions to prevent its alteration, loss, unauthorized or fraudulent consultation, use, or access.;
- q) Timely update, rectify, or delete data as required by this law;
- r) Update the information provided by the Data Controllers within five (5) business days upon receipt;
- s) Note the label "claim in process" in the database as stipulated by the law;
- t) Add the label "information under judicial dispute" to the database once notified by the competent authority about judicial processes related to the quality of the personal data;



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- u) Refrain from circulating information that is being contested by the data owner and has been ordered to be blocked by the Superintendence of Industry and Commerce;
- v) Only allow access to the information to individuals authorized by law.

PARAGRAPH. CONCURRENCE OF RESPONSIBLE AND DATA PROCESSOR ROLES.

As TECNICAÑA acts as both the Data Controller and the Data Processor of its databases, it has chosen to implement an internal manual of policies and procedures to comply with item K of Article 17 and item F of Article 18 of Law 1581 of 2012. If TECNICAÑA has a Data Processor for its personal data, it will require them to adopt a policy manual similar to this one and commit to adhering to the provisions of Law 1581 of 2012, its regulatory decrees, and all security standards to ensure the protection of data owners' personal information.

CHAPTER IV

PROCEDURES

ARTICLE 14: RIGHT OF ACCESS

TECNICAÑA will ensure the data owner or their successors have the right to access their data at all times, in accordance with Article 21 of Regulatory Decree 1377 of 2013. This access will be granted after verifying the identity of the data owner or demonstrating the legitimacy to exercise the data owner's rights. The data owner or their representative can access and know the information being processed by TECNICAÑA.

This access is free of charge and can be done at least once per calendar month, as well as whenever there are substantial changes to the Data Processing Policies that warrant new consultations.

ARTICLE 15: PROCEDURE FOR INQUIRIES OR CLAIMS. To address inquiries and claims promptly and in accordance with the guidelines established in Articles 14 and 15 of Law 1581 of 2012, TECNICAÑA has defined various means through which the data owner or those authorized under Article 20 of Regulatory Decree 1377 of 2013 can exercise their rights.

Data owners or those authorized can access, consult, or file a claim by contacting TECNICAÑA through the email address tecnicana@tecnicana.org or through physical means. Anyone wishing to exercise their rights mentioned in this



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document can do so by written communication, accompanied by their signature and a copy of personal identification or a similar analogous document.

To address the request from the data owner or an authorized person promptly, the inquiry or claim must contain at least the following information:

- Full Name or Company Name of the Data Owner
- Identity Number of the Data Owner
- Location Data of the Data Owner
- Description of the facts that motivate the inquiry, claim, or revocation of authorization
- Preferred method for receiving the response (email or notification address)

When seeking to revoke authorization, the requester must specify whether the revocation is total or partial, and the reasons for their decision.

The Data Owner must provide the corresponding identification documents. If the request is made by someone other than the Data Owner, they must provide documents proving that they can act on behalf of the Data Owner.

ARTICLE 16. ON INQUIRIES. Data Owners or their beneficiaries may request access to the personal information stored about them in any database, as per Article 14 of Law 1581 of 2012. TECNICAÑA is required to provide all information contained in the individual record or linked to the identification of the Data Owner. Requests for access must be made through the designated channels provided by TECNICAÑA, which will be disclosed in the Privacy Notice and outlined in this Manual of Policies and Procedures for Personal Data Processing.

Upon receipt, inquiries will be addressed within a maximum of ten (10) business days. If it's not possible to address the inquiry within this period, the interested party will be informed of the delay along with the reasons for it. A specific date, which will not exceed five (5) business days following the expiration of the initial term, will be provided for addressing the inquiry.

ARTICLE 17. REGARDING CLAIMS/SAINTS. The Data Owner or their beneficiaries who believe that the information in TECNICAÑA's databases should be corrected, updated, or deleted, or who notice a potential breach of any of the duties outlined in Law 1581 of 2012, may file a claim with TECNICAÑA in accordance



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with Article 15 of Law 1581 of 2012. The claim will be processed under the following rules:

1. The claim must be submitted through a request addressed to TECNICAÑA, including the identification of the Data Owner, a description of the facts leading to the claim, the address, and any supporting documents. If the claim is incomplete, TECNICAÑA will ask the interested party to correct the deficiencies within five (5) days following receipt of the claim. If the required information is not provided within two (2) months from the date of the request, the claim will be considered as withdrawn.

If TECNICAÑA receives a claim that it is not competent to resolve, it will forward the claim to the appropriate party within a maximum of two (2) business days and inform the interested party of the situation.

2. Once the complete claim is received, it will be recorded in the database and on the platform of the Superintendence of Industry and Commerce in the National Register of Databases with a notation that reads "claim in process" and the reason for it, within no more than two (2) business days. This notation must remain until the claim is resolved.

3. The maximum time to address the claim will be fifteen (15) business days from the day following its receipt. If it is not possible to address the claim within this time, the interested party will be informed of the reasons for the delay and the date by which the claim will be addressed, which in no case shall exceed eight (8) business days following the expiration of the initial term.

REQUIREMENT OF PROCEDURALITY. According to Article 16 of Law 1581 of 2012, the Data Owner or beneficiary may only file a complaint with the Superintendence of Industry and Commerce once the consultation or claim process with the Data Controller or Data Processor has been exhausted.

ARTICLE 18. PROCEDURE FOR ACCESSING, CONSULTING, RECTIFYING, UPDATING, AND/OR CLAIMING. The Data Owner or their representative may request from TECNICAÑA, free of charge, the rectification, updating, or deletion of their personal data: (i) at least once per calendar month, and (ii) whenever there are substantial changes to the Data Processing Policies that warrant new consultations, provided they prove their identity or the capacity in which they act. If the identity of the requester is not proven, the request will not be processed, but the reason for not processing the request will be provided. TECNICAÑA is obliged to rectify and update, at the request of the Data Owner,



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any information that proves to be incomplete or inaccurate, in accordance with the procedure and terms outlined in this article

Please make sure to remember the following information for any request for rectification, updating, or deletion of data:

1. The name of the Data Owner.
2. The physical or electronic address where the response notification should be sent.
3. Documents proving the identity of the Data Owner or the capacity of their representative.
4. A clear and precise description of the personal data for which the Data Owner seeks to exercise any of their rights.
5. Other elements or documents that facilitate the location of the personal data if applicable.

Once these requirements are met, a response will be provided to the requester within a maximum of fifteen (15) business days.

PARAGRAPH. Please note that for queries made more than once per calendar month, TECNICAÑA may charge the Data Owner for the costs of sending, reproducing, and, if applicable, certifying documents, in accordance with Article 21 of Decree 1377 of 2013.

ARTICLE 19. DATA DELETION. The Data Owner has the right to request TECNICAÑA to delete their personal data at any time. If the deletion of the personal data is deemed appropriate, TECNICAÑA will ensure the removal of the data. The Data Owner may request the deletion of their data in the following cases:

1. When the Data Owner believes the data is not being processed in accordance with the principles, duties, and obligations set out in Law 1581 of 2012.
2. When the data is no longer necessary or relevant for the purpose for which it was collected.
3. When the period necessary to fulfill the purposes for which the data was collected has elapsed.



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However, TECNICAÑA may deny the request for deletion of Personal Data in the following cases:

1. When the data is necessary to protect the Data Owner's legally protected interests, to perform an action in the public interest, or to comply with a legal obligation acquired by the Data Owner.
2. Requests for the deletion of information will not be processed if the Data Owner has a legal or contractual obligation to remain in the database.
3. Data deletion will be obstructed if it hinders judicial or administrative proceedings related to tax obligations, the investigation and prosecution of crimes, or the updating of administrative sanctions.

ARTICLE 20: REVOCATION OF AUTHORIZATION: Data Owners can revoke the authorization for the processing of their personal data at any time, provided that such revocation is not prohibited by legal provisions. The revocation of authorization for the processing of personal data may be total or partial. In any case, TECNICAÑA will use the means and procedures established in Article 15 of Law 1581 of 2012.

Therefore, it is necessary for the Data Owner, when requesting the revocation of consent to TECNICAÑA, to specify whether the revocation is total or partial.

CAPITULO V

INFORMATION SECURITY

ARTICLE 21: SECURITY MEASURES: TECNICAÑA will adopt the technical, human, and administrative measures necessary to ensure the security of records, preventing their alteration, loss, consultation, unauthorized use, or fraudulent access, in compliance with the provisions of Law 1581 of 2012.

ARTICLE 22: IMPLEMENTATION OF SECURITY MEASURES:

TECNICAÑA will maintain mandatory security protocols for personnel with access to personal data and information systems.

ARTICLE 23: MEASURES FOR THE PROTECTION OF PERSONAL DATA: TECNICAÑA has adopted the following security measures for the protection of each of these databases:



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1. All contracts between TECNICAÑA and its employees and/or collaborators include a confidentiality clause, with the latter committing to keep all information, including personal data to which they have access, confidential and secure.
2. TECNICAÑA has limited access to all company databases based on employees' and collaborators' roles and responsibilities. This includes permissions for data entry, access, update, modification, and deletion based on their roles.
3. To verify the identity of the requester, TECNICAÑA has implemented the following measures:
 - a. Data owners must prove their status as the data owner when exercising their rights with TECNICAÑA.
 - b. When receiving a request from a data owner, TECNICAÑA will request their identity document and a photocopy of it.
 - c. If the request is made electronically or through non-presential means, the data owner must include a scanned copy of their identity document along with the signed request. In all cases, TECNICAÑA may contact the data owner using the available notification methods in their databases to authenticate the request.In all cases, TECNICAÑA may contact the data owner using the available notification methods in their databases to authenticate the request.
4. Employee databases will be safeguarded to prevent unauthorized access.
5. TECNICAÑA will ensure that its commercial partners, clients, and suppliers have similar manuals or policies for processing information in compliance with relevant regulations and data owners' rights.

CHAPTER VI

INTERNAL PROVISIONS

ARTICLE 24: DESIGNATION. TECNICAÑA has established procedures to promptly handle requests from the Holders or their authorized representatives. The company has appointed the Customer Service Assistant to receive requests from the holders to exercise their rights of access, consultation, rectification, updating, suppression, and revocation as per Law 1581 of 2012.



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To make inquiries, file claims, or lodge complaints regarding the processing of personal data or to exercise user or customer rights, you can contact TECNICAÑA via email at tecnicana@tecnicana.org, through the physical means available at the data controller's facilities, or at its branches if any. TECNICAÑA will provide the means for the holder to exercise their rights through the same means by which their information was collected, keeping a record of the request's reception and processing

PARAGRAPH: Along with the designated person in this article, a control and evaluation will be carried out regarding compliance, results, and documentation of corrective and/or preventive actions related to the processing of personal data to achieve continuous improvement in processing stages and protect the rights of the holders.

ARTICLE 25: IDENTIFICATION OF THE DATA CONTROLLER AND DATA PROCESSOR. In compliance with the provisions of Law 1581 of 2012, TECNICAÑA has determined that it will not delegate the responsibility and management of its databases to any third party. Therefore, for the purposes of this manual, TECNICAÑA will act as both the Data Controller and Data Processor of its databases.

ARTICLE 26. VALIDITY. This manual will be effective from September 1, 2022, and the validity of the databases will be indefinite. In any case, this document is published on the website www.tecnicana.org or on the means provided by the Superintendence of Industry and Commerce in the National Database Registry.

 www.tecnicana.org
 tecnicana@tecnicana.org
 Calle 38 Norte # 3CN-75 / Cali, Colombia
 Cel.: +57 (316) 8338724 / Fijo: +57 (602) 6653252



Certificado No. SC8827-1

ANNEX 1

PERSONAL DATA PROCESSING AUTHORIZATION

I _____, identified as indicated by my signature, in accordance with the provisions of Law 1581 of 2012 and Decree 1377 of 2013, declare that I have freely, voluntarily, and knowingly provided the personal data requested by THE COLOMBIAN ASSOCIATION OF SUGAR CANE TECHNICIANS OF COLOMBIA for collection in its databases. In accordance with the above, I declare that:

(i) I am informed that THE COLOMBIAN ASSOCIATION OF SUGAR CANE TECHNICIANS OF COLOMBIA acts as the data controller and processor of my personal data; (ii) I have been informed that responses to questions asked of me, when concerning sensitive data or data about children and adolescents, are optional, and I am not obligated to answer them or provide the information; (iii) I authorize my personal data to be collected and processed in accordance with the Data Processing Policies of THE COLOMBIAN ASSOCIATION OF SUGAR CANE TECHNICIANS OF COLOMBIA; (iv) I declare that I am informed of my rights as the holder of personal data, as provided in Law 1581 of 2012 and Decree 1377 of 2013, especially the rights to know, update, and rectify my personal data;

(v) I authorize my personal data to be provided to third parties, without the need to request further authorization from me as the holder. With the exception of sensitive data, which will never be shared with third parties, as it is considered sensitive information under current personal data protection regulations, including health information incorporated into medical records, data of minors, among others; (vi) I consent that this authorization corrects any data processing that may have been done without prior authorization by THE COLOMBIAN ASSOCIATION OF SUGAR CANE TECHNICIANS OF COLOMBIA, now being authorized by this document.

I give my explicit authorization or expressly authorize THE COLOMBIAN ASSOCIATION OF SUGAR CANE TECHNICIANS OF COLOMBIA to process my personal data, which includes: collection, storage, use, circulation, or deletion, and in any other way manage my Personal Data for the following purposes:

CLIENTS

- Sending commercial, advertising or promotional information on the products and/or services, events and/or promotions of a commercial or non-commercial nature promoted by the Company, to physical mail, e-mail, mobile

phones or mobile devices, via text messages (SMS and/or MMS) or any other analogue and/or digital means of communication created or to be created, in order to promote, invite, direct, carry out, inform and, in general, carry out campaigns, promotions or competitions of a commercial or advertising nature promoted by the Company.

- Send information relating to service reports, invoices, payment receipts and other documents relating to the commercial relationship.
- Carry out commercial, statistical, risk, market, quality, interbank and financial analyses and research, among others.
- Formalize contractual processes and carry out the provision of the service or delivery of the product purchased.
- Carry out administrative and financial formalities.
- To respond to the requirements of the competent authorities.
- To respond to legal obligations regarding the conservation of documents.
- To know the details of the holder of the data, stored in credit information centers or in financial, credit, commercial and third country information databases, as referred to in Law 1266 of 2008, as well as in judicial data bases, among others.
- To process and respond to requests, complaints and claims from customers.
- Other purposes necessary for the development of the company's business and the provision of its services.

SUPPLIERS AND OTHERS

- Sending commercial, advertising or promotional information on the products and/or services, events and/or promotions of a commercial or non-commercial nature promoted by the Company, to physical mail, e-mail, mobile phones or mobile devices, via text messages (SMS and/or MMS) or any other analogue and/or digital means of communication created or to be created, in order to promote, invite, direct, carry out, inform and, in general, carry out campaigns, promotions or competitions of a commercial or advertising nature promoted by the Company.



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- Send information related to service reports, billing, payment receipts, and other documents related to commercial relationships.
- Formalize contracting processes and monitor the provision of contracted services or the delivery of acquired products or supplies.
- Perform administrative and financial management related to commercial relationships.
- Respond to the requirements of competent authorities.
- Comply with legal obligations in document retention.
- Process and respond to requests, complaints, and claims submitted by suppliers.
- All other purposes necessary for the development of the company's corporate purpose and the provision of its services.

EMPLOYEES

- Develop processes for employee selection, evaluation, and onboarding.
- Manage employee and family data for matters related to remuneration, contributions, obligations, benefits, taxes, and other necessary information (medical services, scholarships, training, among others), as required by the department responsible for personnel management.
- Manage internal communications.
- Support employee participation in corporate or social programs.
- Managing work hours, attendance, and physical access to facilities.
- Conducting performance evaluations, assessments, and training on skills, competencies, and employee safety.
- Managing personal data for the correct allocation and use of assets and work tools.
- Receiving requests, complaints, claims, and other communications from employees.
- Responding to the requirements of competent authorities.
- Complying with legal obligations in document retention.



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- All other purposes necessary for the development of the company's corporate purpose and in relation to its employees.

To exercise the rights mentioned above, or to make inquiries or claims related to your Personal Data, you can contact the company responsible for personal data processing: Company Name: THE COLOMBIAN ASSOCIATION OF SUGAR CANE TECHNICIANS OF COLOMBIA TIN: 890.315.331-5 Address: Calle 38 Norte No. 3 CN-75 Cali- Valle del Cauca Phone: (602) 4078414; Cell: (+57) 316-5272976; Email: tecnicana@tecnicana.org.

Signature of the Personal Data Holder:

I authorize,

Name:

Citizenship card:

PRIVACY NOTICE

Controller and Processor: THE COLOMBIAN ASSOCIATION OF SUGAR CANE TECHNICIANS OF COLOMBIA

TIN. 890.315.331-5

According to Law 1581 of 2012, we want to inform you that the personal data you have given us will be included in our database and used for the purposes stated in this document. The data will be processed through collection, storage, use, circulation, elimination, and any other form of administration of personal data. THE COLOMBIAN ASSOCIATION OF SUGAR CANE TECHNICIANS OF COLOMBIA also wants to inform you that you have rights as a data Owner as provided by Law 1581 of 2012 and Decree 1377 of 2013

The management, processing, and security of the collected data will be conducted in compliance with the "Policy and Procedure Manual for the Processing of Personal Data," which contains the policies established by THE COLOMBIAN ASSOCIATION OF SUGAR CANE TECHNICIANS OF COLOMBIA for data processing. It also outlines the procedures for enforcing the rights of the data Owner to know, update, rectify, or delete data stored in our database, as well as to make inquiries or complaints to the data controller and to revoke authorization for the use of the data. The aforementioned manual can be accessed at the main office located at Calle 38 Norte No. 3 CN – 75, on the website www.tecnicana.org, or through the means provided by the Superintendence of Industry and Commerce in the National Database Registry.

To submit inquiries, complaints, or claims regarding the processing of personal data, or to exercise your rights as a user or client, you may contact THE COLOMBIAN ASSOCIATION OF SUGAR CANE TECHNICIANS OF COLOMBIA by email at tecnicana@tecnicana.org, or visit the service point located at Calle 38 Norte No. 3 CN – 75, Cali, Valle del Cauca.

Lastly, please note that when questions are asked about sensitive data or data concerning children and adolescents, providing responses is optional. Therefore, the individual is not obliged to provide this information.

CURPOSES OF PERSONAL DATA PROCESSING FOR CLIENTS:

CLIENTS



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- Sending commercial, advertising, or promotional information about products and/or services, events and/or promotions, whether commercial or not, via physical or electronic mail, cell phone, or mobile device through text messages (SMS and/or MMS) or any other analog and/or digital communication medium, whether currently existing or to be created. This is to promote, invite, direct, execute, inform, and generally carry out commercial or advertising campaigns, promotions, or contests conducted by the company.
- Send information related to service reports, billing, payment receipts, and other documents related to commercial relationships.
- Conduct commercial, statistical, risk, market, quality, interbank, and financial analyses and research, among others.
- Formalize contracting processes and carry out the provision of services or delivery of the acquired product.
- Perform administrative and financial management.
- Respond to the requirements of competent authorities.
- Comply with legal obligations in document retention.
- Access the data Owner's information stored in credit information centers or in financial, credit, commercial, and other third-party databases, as referred to in Law 1266 of 2008, and databases of judicial records, among others.
- Process and respond to requests, complaints, and claims submitted by clients
- Other Purposes Necessary for the Development of the Company's Business Objectives and the Provision of its Services

SUPPLIERS AND OTHERS

- Sending commercial, advertising, or promotional information about products and/or services, events and/or commercial or non-commercial promotions by physical mail, email, cell phone, text messages (SMS and/or MMS), or other digital communication means to promote, invite, direct, execute, inform, and generally carry out campaigns, promotions, or advertising contests conducted by the company.
- Sending information related to service reports, billing, payment receipts, and other documents related to commercial relationships.



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- Formalizing hiring processes and monitoring the provision of contracted services or the delivery of purchased products or supplies.
- Carrying out administrative and financial tasks related to commercial relationships.
- Responding to requests from competent authorities-.
- Fulfilling legal obligations concerning document preservation.
- Processing and responding to requests, complaints, and claims submitted by providers.
- Other purposes necessary for the development of the company's business objectives and the provision of its services.

EMPLOYEES

- Developing the process of selection, evaluation, and employment.
- Managing employee and family data for issues related to remuneration, contributions, obligations, benefits, taxes, and other necessary information required by the personnel management department, such as medical services, scholarships, and training, among others.
- Managing internal communications.
- Managing employee participation in corporate or social programs
- Managing timekeeping, attendance, and physical access to facilities
- Conducting performance evaluations, assessments, and providing training on skills, competencies, and employee safety
- Managing personal data for the proper allocation and use of assets and work tools
- Receiving requests, complaints, claims, and other submissions from employees
- Responding to requests from competent authorities
- Fulfilling legal obligations concerning document preservation
- Other purposes necessary for the development of the company's business objectives and in the relationship with its employees.