

h) Company - LIDARIT. **i)** Processor: Natural or legal person, public or private, who by himself or in association with others, performs the processing of personal data on behalf of the Data Controller; **j)** 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; **k)** Owner: Natural person whose personal data is subject to Treatment; **l)** Treatment: Any operation or set of operations on personal data, such as the collection, storage, use, circulation or deletion thereof.

5. GUIDING PRINCIPLES FOR THE PROCESSING OF PERSONAL DATA: The following principles will be applied harmoniously and comprehensively:

a) Principle of legality in terms of Data Processing: The Processing of personal data must be subject to the provisions of the applicable legislation on the matter; **b)** Principle of purpose: The Treatment must obey a legitimate purpose by the Constitution and the Law, which must be informed to the Owner; **c)** Principle of freedom: Treatment can only be exercised with the prior, express and informed consent of the Owner. Personal data may not be obtained or disclosed without prior authorization, or in the absence of a legal or judicial mandate releasing consent; **d)** Principle of truthfulness or quality: The information subject to Treatment must be truthful, complete, exact, updated, verifiable and understandable. Treatment of partial, incomplete, fractional or misleading data is prohibited; **e)** Principle of transparency: In the Treatment, the Holder's right to obtain from the Data Controller or the Treatment Manager, at any time and without restrictions, information about the existence of data concerning him must be guaranteed; **f)** Principle of access and restricted circulation: Treatment is subject to the limits derived from the nature of personal data, the provisions of applicable laws and the Constitution. Personal data, except for public information, will not be published on the Internet or other means of dissemination or mass communication, unless access is technically controllable to provide restricted knowledge only to the Holders or authorized third parties following the applicable regulations; **g)** Principle of security: The information subject to Treatment by the Person Responsible or in Charge, must be handled with the technical, human and administrative measures that are necessary to grant security to the records, avoiding their adulteration, loss, consultation, use or unauthorized access. or fraudulent; **h)** Principle of confidentiality: All persons involved in the processing of personal data that are not public are obliged to guarantee the confidentiality of the information, even after the end of their relationship with any of the tasks that comprise the Processing, being able to supply or communicate personal data only when it corresponds to the development of the activities authorized in the applicable legislation and its terms.

6. PURPOSE FOR WHICH THE COLLECTION OF PERSONAL DATA IS MADE AND THE PROCESSING OF THEMSELVES: LIDARIT may make use of personal data to:

a) The correct provision of its services, in the development of its corporate purpose, the above implies the administration of direct contractual and non-contractual relationships, as well as those where it acts as a shareholder, supplier or client; **b)** The administration of the relationship with its suppliers and employees; **c)** Carrying out commercialization, promotion and marketing tasks, to offer their services and improve the provision of the latter; **d)** Maintain constant communication with the holders of personal data; **e)** Report on new services and/or modifications in them; **f)** Carry out processes of knowledge of potential clients or update the information of their clients or users; **g)** Consult

database centers or Information and Risk Operators, or any other entity that manages or administers databases and reports on credit capacity and behavior; **h)** Report to the Centrals of information mentioned in the previous literal the behavior (present, past, and future) of the clients, indebtedness, and especially the birth, modification, extinction of the obligations contracted with the Company; **i)** Send to the physical, electronic mail, social networks or mobile device, via text messages (SMS and / or MMS) or through any other means of existing or future communication, institutional, advertising or commercial information about the products and / or services of the Company, its commercial partners or projects in which it participates; **j)** Carry out market, financial, statistical and risk studies, investigations, and reports, among others; **k)** Develop the process of selection, evaluation, and employment relationship; **l)** Evaluate the quality of the services or products provided; **m)** Supply, share, send or deliver your data to insurance companies, legal advisors, software providers, tax authorities, subcontractors that process, manage or use the information, if said companies require the information for the purposes indicated here, in which case the need to protect said personal information and preserve the obligation of confidentiality on it is warned; **n)** Disclose and deliver customer information in case of portfolio sale or assignment of obligations, in which case the assigned obligations retain legal actions and may be exercised by the transferee of the obligation; **o)** Those indicated in the authorization granted by the data holder or described in the respective privacy notice, as the case may be; **p)** General compliance with the legal and contractual obligations that assist the company.

7. RIGHTS OF THE PERSONAL DATA HOLDER:

a) To know, update and rectify your data vis-à-vis LIDARIT This right may be exercised, among other things, against partial, inaccurate, incomplete, fractional data that is misleading, or those whose treatment is expressly prohibited or has not been authorized; **b)** Request proof of authorization, except when expressly excepted by law; **c)** Be informed about the use that has been given to personal data, upon express request by the owner; **d)** Submit complaints to the Superintendency of Industry and Commerce for infractions of the provisions of the applicable legislation on the processing of personal data. **e)** The right to require compliance with the orders issued by the Superintendency of Industry and Commerce. **f)** Free access to personal data that has been processed.

PARAGRAPH: To enforce the rights of the owner, LIDARIT will request your identity or that of the person who represents your rights and the legal support of said representation. LIDARIT will refrain from marketing, disclosing, publishing, personal data, unless there is express authorization to do so, it is necessary to fulfill the functions and obligations that are at the head of LIDARIT under any contractual or commercial relationship, or that said functions and Obligations have been entrusted to a contractor when a merger, spin-off, acquisition, or some process of restructuring of the company is carried out or the company participates as a partner in any project, and it corresponds to it to process personal data.

LIDARIT will collect, store, use and/or circulate personal data for as long as it is reasonable and necessary, following the provisions applicable to the matter, for the purposes that justify the Treatment and taking into account legal duties, obligations and relationships. or contractual that the holders have, so that they must remain or not in the company databases.

8. DUTIES: LIDARIT is obliged to fulfill the duties imposed by the applicable regulations regarding the processing of personal data when it acts:

I) As Data Controllers: **(a)** Guarantee to the Holder the exercise of the right of habeas data; **(b)** Request and keep, under the conditions set forth herein, a copy of the respective authorization granted by the owner; **(c)** Inform the owner about the purpose of the collection and the rights that assist him under the authorization granted and the use that will be given to his data; **(d)** Keep the information under security conditions that prevent its adulteration, loss, consultation, use or unauthorized or fraudulent access; **(e)** Update the information of the holders and rectify it when it is incorrect; **(f)** Process the queries and claims made by the holders of the information; **(g)** Seek that the principles of truthfulness, quality, security and confidentiality in the terms established in the following policy; **(h)** Demand respect for the security and privacy conditions of the Owner's information and Inform the data protection authority when there are violations of its security and when there are risks in the administration of the information; **(i)** Comply with the instructions and requirements issued by the Superintendence of Industry and Commerce.

II) As Managers of the processing of personal data, when it arrives to carry out the treatment on behalf of another entity or organization (Responsible for the treatment) it must: **a)** Guarantee the Owner, the exercise of the right of habeas data; **b)** Keep the information under the necessary security conditions to prevent its adulteration, loss, consultation, use or unauthorized or fraudulent access; **c)** Timely update, rectify or delete the data under the terms of this law; The updating of the information reported by the Treatment Managers, must be made within five (5) business days from its receipt; **d)** Process the queries and claims made by the Holders in the terms indicated in the applicable legislation; **e)** Register in the database the legend "claim pending" in the form in which it is regulated in the applicable regulations; **f)** Insert in the database the legend "information in judicial discussion" once notified by the competent authority about judicial processes related to the quality of personal data; **g)** Refrain from circulating information that is being controversial by the Holder and whose blocking has been ordered by the Superintendency of Industry and Commerce; **h)** Allow access to information only to people who may have access to it; **i)** Inform the Superintendency of Industry and Commerce when there are violations of security codes and there are risks in the administration of the information of the Holders; **j)** Comply with the instructions and requirements issued by the Superintendence of Industry and Commerce.

9. REQUEST FOR AUTHORIZATION TO THE PERSONAL DATA HOLDER: Previously and/or at the time of collecting personal data, LIDARIT will request authorization from the owner of the data, for its collection and treatment, communicating the purpose of obtaining it, through means automated technicians, oral or written, that allow proof of authorization and/or unequivocal conduct described in article 7 of Decree 1377 of 2013.

10. RESPONSIBLE AREA AND PROCEDURE FOR THE EXERCISE OF THE RIGHTS OF THE PERSONAL DATA HOLDERS: The Administrative Area will be responsible for attending to the requests, complaints, and claims of the data holders, according to the rights that correspond to them according to the number 7 of this policy and applicable legislation.

The owner of the personal data or whoever represents him may submit his request, complaint or claim from Monday to Friday from 8:00 am to 5:00 pm to the email hello@lidarit.com or communicate to the LIDARIT telephone line, or file it at our office at the address: CALLE 36 # 128 321 ZF ZONAMERICA de Cali.

This complaint will be resolved by the person in charge of the area, who is in charge of handling the data of the owner, according to the quality in which he acts against the company, according to its different lines of business.

The petition, complaint or claim must contain the identification of the Holder, the detailed facts on which it is based, contact details, such as an address, telephone, and email, along with the documents (attachments) that it considers important. If incomplete or inaccurate information is presented, the interested party will be required within five (5) business days after receipt of the request, complaint or claim to correct or complete it. If after two (2) months from the date of the request, the applicant does not rectify or submit the required information, it will be understood that he has withdrawn from the request. Once the complete request has been received, the legend "claim pending" and the reason for it will be included in the database, within a term not to exceed three (3) business days. Said legend must be kept until the claim is resolved. The maximum term to meet the request will be fifteen (15) business days from the day after the date it was received with complete and correct information. When it is not possible to attend the claim within the said period, the interested party will be informed of the reasons for the delay and the date on which their request will be addressed, which, in no case, may exceed eight (8) business days after expiration. of the first term mentioned above.

11. SECURITY MEASURES: In the development of the security principle established in Law 1581 of 2012, LIDARIT will adopt the technical, human and administrative measures that are necessary to grant security to the records, avoiding their adulteration, loss, consultation, use or access. authorized or fraudulent. The personnel who carry out the processing of personal data will execute the established protocols to guarantee the security of the information. Additionally, audits will be established to monitor compliance with the policy and the procedures derived from its implementation.