



PERSONAL DATA PROCESSING POLICY

COMPANY AERO AGRÍCOLA INTEGRAL SAS- CAAISA

I. GENERAL CONSIDERATIONS

In compliance with the provisions of Statutory Law 1581 of 2012 and its Regulatory Decree 1377 of 2013, THE COMPANY adopts this policy for the processing of personal data, which will be informed to all owners of the data collected or that in the future are obtained in the exercise of commercial, contractual or labor activities.

In this way, THE COMPANY states that it guarantees the rights of privacy, intimacy, good name, in the processing of personal data, and consequently all its actions will be governed by the principles of legality, purpose, freedom, truthfulness or quality, transparency, restricted access and circulation, security and confidentiality.

All people who, in the development of different contractual, commercial or labor activities, among others, whether permanent or occasional, who will provide THE COMPANY with any type of information or personal data, will be able to know it, update it and rectify it when they consider it pertinent. . .

THE COMPANY recognizes the importance of proper management of the collection, storage and use of personal data based on the premise that the information of its workers, clients, suppliers and third parties is a fundamental tool for the development of its corporate purpose.

CAAISA
COMPAÑÍA AERO AGRÍCOLA INTEGRAL S.A.S

NIT. 860.011.246-2

Contiguo al Aeropuerto Antonio Roldán Betancourt
Km 7. Vía Zungo embarcadero. Predio San Sebastian

Carepa, Antioquia

3214250058 | administracion@caaisa.com





II. IDENTIFICATION OF THE RESPONSIBLE FOR THE TREATMENT

COMPANY NAME AND IDENTIFICATION : COMPAÑÍA AERO AGRÍCOLA INTEGRAL SAS-CAAISA, which from now on will be called THE COMPANY or CAAISA, Commercial Company identified with NIT. 860.011.246-2, registered in the Urabá Chamber of Commerce.

ADDRESS AND ADDRESS: THE COMPANY is domiciled in the municipality of Carepa, and its main headquarters are located at Kilometer 7 via Zungo Embarcadero Predio San Sebastián, Carepa-Antioquia.

EMAIL: administracion@caaisa.com.

PHONE: (+57) 321 425 0058

III. AIM

With the implementation of this Policy, it is intended to guarantee the confidentiality of information and the security of the treatment that will be given to it to all clients, suppliers, employees and third parties from whom THE COMPANY has legally obtained information and personal data in accordance with. to the guidelines established by the law regulating the right to Habeas Data. Likewise, through the issuance of this policy, the provisions of literal K of article 17 of the aforementioned law are complied with.

The processing of the personal data of the person with whom THE COMPANY has established or establishes a relationship, permanent or occasional, will be carried out within the legal framework that regulates the matter. In any case, personal data may be collected and processed to:

- to. Develop the corporate purpose of THE COMPANY in accordance with its legal statutes.
- b. Comply with applicable tax, commercial and aeronautical regulations.
- C. Comply with the provisions of the Colombian legal system on labor and social security matters, among others, applicable to former employees, current employees and candidates for future employment.

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d. Conduct surveys related to the services or goods of THE COMPANY. Send commercial information about THE COMPANY.

F. Develop programs in accordance with its statutes. Fulfill all your contractual commitments.

IV. DEFINITIONS

For the purposes of this policy and in accordance with current regulations on the protection of personal data, the following definitions will be taken into account:

- **AUTHORIZATION:** prior, express and informed consent of the owner to carry out the processing of personal data.
- **PRIVACY NOTICE :** verbal or written communication generated by the person responsible, addressed to the owner 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.
- **DATABASE:** organized set of personal data that are subject to processing.
- **CAUSEAGRENT:** person who has succeeded another due to the latter's death (heir).
- **PERSONAL DATA:** any piece of information linked to one or more specific or determinable persons or that can be associated with a natural or legal person.
- **PUBLIC DATA:** is data that is not semi-private, private or sensitive. Public data are considered, among others, data relating to the marital status of people, their profession or trade, and their status as a merchant or public servant. By its nature, public data may be contained, among others, in registries,

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public documents, public documents, official gazettes and bulletins and duly executed judicial rulings that are not subject to reservation.

- **SENSITIVE DATA:** Sensitive data is understood to be data that affects the privacy of the owner or whose improper use may lead to discrimination, such as data that reveals racial or ethnic origin, political orientation, religious or philosophical convictions, membership in unions, social organizations, human rights organizations or that promote the interests of any political party or that guarantee the rights and guarantees of opposition political parties, as well as data related to health, sexual life, and biometric data.
- **ESSENTIAL DATA:** are understood as those personal data of the owners that are essential to carry out the activity of the entity. Data of an essential nature must be provided by their owners or those authorized to exercise these rights.
- **OPTIONAL DATA:** are those data that the entity requires to offer promotional, training or information services, etc.
- **DATA PROCESSOR:** natural or legal person, public or private, who, by themselves or in association with others, carries out the Processing of personal data on behalf of the Data Controller.
- **DATA PROTECTION LAW:** is Law 1581 of 2012 and its regulatory Decrees or the rules that modify, complement or replace them.
- **HABEAS DATA:** right of any person to know, update and rectify the information that has been collected about them in the data bank and in files of public and private entities.

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- **RESPONSIBLE FOR THE TREATMENT:** natural or legal person, public or private, who, by themselves or in association with others, decides on the database and/or Data Processing.
- **OWNER:** natural person whose personal data is the subject of Treatment.
- **PROCESSING:** any operation or set of operations on personal data, such as collection, storage, use, circulation or deletion.
- **TRANSFER:** the transfer of data takes place when the person responsible 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 responsible for the treatment and is located inside or outside from the country.
- **TRANSMISSION:** processing of personal data that involves the communication thereof within or outside the territory of the Republic of Colombia when its purpose is to carry out processing by the person in charge on behalf of the person responsible.

V. BEGINNING

For purposes of guaranteeing the protection of personal data, THE COMPANY The following principles will be applied in a harmonious and comprehensive manner, in light of which the processing, transfer and transmission of personal data must be carried out:

- **Principle of legality regarding data processing:** Data processing is a regulated activity, which must be subject to the current and applicable legal provisions that govern the subject.
- **Purpose principle:** the personal data processing activity carried out by THE COMPANY or to which it has access, will obey a legitimate purpose in line with the Political Constitution of Colombia, which must be informed to the respective owner of the personal data.

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- **Principle of freedom:** the processing of personal data can only be carried out 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, statutory, or judicial mandate that reveals consent.
- **Principle of truthfulness or quality:** the information subject to Personal Data Processing must be truthful, complete, exact, updated, verifiable and understandable. The Processing of partial, incomplete, fragmented or error-inducing data is prohibited.
- **Principle of transparency:** In the processing of personal data, THE COMPANY will guarantee the Owner their right to obtain, at any time and without restrictions, information about the existence of any type of information or personal data that is of interest or ownership.
- **Principle of restricted access and circulation:** The processing of personal data is subject to the limits that derive from their nature, the provisions of the law and the Constitution. Consequently, the treatment can only be carried out by people authorized by the owner and/or by the people provided for by law. Personal data, except public information, may not be available on the Internet or other means of dissemination or mass communication, unless access is technically controllable to provide knowledge restricted only to the owners or third parties authorized in accordance with the law. For these purposes, THE COMPANY 's obligation will be medium.
- **Security principle:** the information subject to processing by THE COMPANY must be managed with the technical, human and administrative measures that are necessary to provide security to the records, avoiding their adulteration, loss, consultation, unauthorized or fraudulent use or access.
- **Principle of confidentiality:** All people who, in THE COMPANY, administer, manage, update or have access to information of any type found in Databases, are obliged to guarantee the confidentiality of the information, so they undertake to keep. and keep strictly confidential and not reveal to third parties, all the information that they come to know in the execution and exercise.

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- of its functions; except when these are activities expressly authorized by the data protection law. This obligation persists and will continue even after the end of your relationship with any of the work that includes the Treatment.

VI. RIGHTS OF THE INFORMATION HOLDER

In accordance with the provisions of the current applicable regulations on data protection, the owners of personal data have the right to:

to. Access, know, update and rectify your personal data before the COMPANY in its capacity as data controller. This right may be exercised, among others, against partial, inaccurate, incomplete, fragmented, misleading data, or data whose processing is expressly prohibited or has not been authorized.

b. Request proof of the authorization granted to the COMPANY for data processing, by any valid means, except in cases where authorization is not necessary.

C. Be informed by THE COMPANY, upon request, regarding the use it has given to your personal data.

d. Submit complaints to the Superintendency of Industry and Commerce for violations of the provisions of Law 1581 of 2012 and other regulations that modify, add or complement it, after processing a consultation or request before THE COMPANY.

my. Revoke the authorization and/or request the deletion of the data.

F. Access free of charge to your personal data that has been processed, at least once every calendar month, and each time there are substantial modifications to this policy that motivate new queries.

These rights may be exercised by:

- The owner, who must prove his identity sufficiently by the different means made available to him by THE COMPANY.
- The successors in title of the owner, who must prove such quality.
- The representative and/or attorney-in-fact of the owner, prior accreditation of the representation or power of attorney.
- Another in favor or for which the owner has stipulated.

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VII. DUTIES OF THE COMPANY AS THE CONTROLLER IN CHARGE OF THE PROCESSING OF PERSONAL DATA

THE COMPANY recognizes the ownership of personal data held by individuals and, consequently, they can exclusively decide on it. Therefore, THE COMPANY will use personal data to fulfill the purposes expressly authorized by the owner or by current regulations.

In the treatment and protection of personal data, THE COMPANY will have the following duties, without prejudice to others provided for in the provisions that regulate or come to regulate this matter:

to. Guarantee the holder, at all times, the full and effective exercise of the right of habeas data.

b. Request and keep a copy of the respective authorization granted by the owner for the processing of personal data.

C. Duly inform the owner about the purpose of the collection and the rights granted to him by virtue of the authorization granted.

d. Maintain the information under the security conditions necessary to prevent its adulteration, loss, consultation, use or unauthorized or fraudulent access.

my. Guarantee that the information is true, complete, accurate, up-to-date, verifiable and understandable.

F. Timely update the information, thus addressing all new developments regarding the owner's data. In addition, all necessary measures must be implemented so that the information is kept up to date.

gram. Correct information when it is incorrect and communicate what is pertinent.

h. Respect the security and privacy conditions of the owner's information.

Yo. Process queries and claims made in the terms established by law.

j. Identify when certain information is under discussion by the owner.

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k. Inform at the request of the owner about the use given to their data.

l. Inform the data protection authority when violations of security codes occur and there are risks in the administration of the owners' information.

meter. Comply with the requirements and instructions issued by the Superintendency of Industry and Commerce on the particular topic.

north. Only use data whose processing is previously authorized in accordance with the provisions of Law 1581 of 2012.

either. Ensure the appropriate use of the personal data of children and adolescents, in those cases in which the processing of their data is authorized.

p. Register in the database the legends "claim in process" in the way regulated by law.

q. Insert in the database the legend "information under judicial discussion" once notified by the competent authority about judicial processes related to the quality of personal data.

r. Refrain from circulating information that is being controversial by the owner and whose blocking has been ordered by the Superintendency of Industry and Commerce

s. Allow access to information only to people who can have access to it.

t. Use the personal data of the owner only for those purposes for which it is duly authorized and respecting in all cases the current regulations on the protection of personal data.

VIII. RESPONSIBLE AND IN CHARGE OF PERSONAL DATA PROCESSING

THE COMPANY will be responsible for the processing of personal data. The administrative department will be in charge of processing personal data. Any communication on the matter must be made through the email comunicacion@caaisa.com

IX. AUTHORIZATION AND CONSENT OF THE OWNER

THE COMPANY requires obtaining free, prior and express consent from the Owners in order to process their personal data. For this purpose, THE COMPANY must have the necessary mechanisms to obtain this authorization from the Owners, guaranteeing its verification at all times.

The authorization by the Owner can be made in a physical, electronic document or in any other format, whether completed by the owner or by a third party under the responsibility of the Owner, which allows its subsequent consultation to be guaranteed, or through a technical, technological or procedural mechanism. . through which it can be concluded unequivocally that if the owner's conduct had not occurred, the data would never have been collected and stored in the databases.

X. PROCEDURE FOR ATTENDING QUERIES, CLAIMS, REQUESTS FOR RECTIFICATION, UPDATE AND DELETION OF DATA

The owners or their successors may consult the personal information of the owner that resides in THE COMPANY, who will provide all the information contained in the individual record or that is linked to the identification of the Owner. Likewise, THE COMPANY provides the mechanism through which the owner can raise claims for the purposes of updating, rectifying, deleting the data or definitively revoking the authorization.

In any case, regardless of the mechanism implemented to respond to consultation requests, they will be responded to within a maximum period of ten (10) business days from the date of receipt. When it is not possible to attend to the query within said period, the interested party will be informed before the expiration of the (10) days, expressing the reasons for the delay and indicating the date on which their query will be attended to, which in no case may exceed. the following five (5) business days after the expiration of the first term.

Queries can be made to the email comunicacion@caaisa.com

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XI. INFORMATION SECURITY MEASURES


In compliance with the security principle established in Law 1581 of 2012, THE COMPANY will adopt the techniques, human and administrative measures that are necessary to provide security to the records, preventing their adulteration, loss, consultation, unauthorized or fraudulent use or access.

XII. VALIDITY

This policy applies as of May 10, 2017.
Version 2 (February 2023)



IGNACIO A. JIMÉNEZ CADAVID
CC15.501.003
Legal Representative - Manager



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