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## I. OBJECTIVE

SQDM S.A.S., during its commercial activities, collects, stores, uses, circulates, and deletes personal information from its clients, suppliers, employees, and natural persons who may have a contractual or legal relationship with the company.

SQDM S.A.S. is aware of the implications of Personal Data Processing; therefore, it carries out such activity following the principles and guidelines contained in the Statute for the Protection of Personal Data - Law 1581 of 2012, the Decrees that regulate it, and the Guide for the Implementation of the Principle of Demonstrated Responsibility of the Superintendence of Industry and Commerce.

The Personal Data Processing Policy of SQDM S.A.S. seeks to guarantee the right to Habeas Data of natural persons who have provided their personal data to the company for proper processing (use, collection, deletion, storage, and circulation) according to the purpose informed in the authorization for the processing of personal data, which will be communicated through the SQDM S.A.S. website and will be available to anyone who wishes to consult it.

## II. OBLIGATIONS

This policy is mandatory and strictly enforced for SQDM S.A.S.

## III. IDENTIFICATION OF THE RESPONSIBLE PARTY FOR THE PROCESSING OF PERSONAL DATA

SQDM S.A.S., a Colombian company domiciled at Calle 31 # 13A-51 | Office 112, with email address [info@sqdm.com](mailto:info@sqdm.com) and phone number 3208661008, as the responsible party for the processing of personal data, is a company established by private document dated July 26, 2005, registered with the Bogotá Chamber of Commerce on November 17, 2006, under number 01090709 of Book IX, identified with NIT 900038222-8 and Commercial

Registry 01653082 dated November 17, 2006.

SQDM S.A.S. has designated within its structure a Personal Data Protection Officer in accordance with the provisions of the Guide for the Implementation of the Principle of Demonstrated Responsibility of the Superintendence of Industry and Commerce. The Personal Data Protection Officer assumes the function of protecting personal data within the company, in compliance with the regulations governing the matter, as well as the policies established for this purpose within SQDM S.A.S.

#### IV. SCOPE OF THE INFORMATION PROCESSING POLICY

In accordance with Law 1581 of 2012, the data subject is understood to be the 'Natural person whose personal data is subject to processing.' Therefore, SQDM S.A.S.'s policy focuses on personal data originating from natural persons.

The coverage of these policies applies to all employees, clients, suppliers, as well as potential clients with whom the company communicates, SQDM S.A.S., acting as the data processing controller.

Within the company, there is no processing (collection, storage, use, circulation, or deletion) of sensitive data (understanding sensitive data as those that affect the privacy of the Data Subject or whose misuse could lead to discrimination, such as racial or ethnic origin, political orientation, religious beliefs, among others) of the data subjects.

#### V. RECIPIENTS

This policy will apply to all databases, both physical and digital, that contain personal data and that are subject to Processing by SQDM S.A.S., acting as the Controller.

The coverage of these policies applies to all clients, suppliers, and employees of SQDM S.A.S., as well as to potential individuals with whom the Company communicates.

#### VI. PROCESSING AND PURPOSE

SQDM S.A.S. processes the personal data listed below according to the database and the purposes indicated in the following table:

	PERSONAL DATA	OBJECTIVE
CLIENTS	Names, surname, type of identification, identification number, date and place of issuance, marital status, signature, nationality, electronic signature, position held, telephone numbers, office address, email address, other identification documents, place and date of birth, age.	<ol style="list-style-type: none"> <li>1. Carry out the relevant procedures for the development of the company's business related to compliance with the purpose of the contract entered with the information holder.</li>   <li>2. Contact the Data Subject through telephone means, electronic means - SMS, chat, or via email for the marketing of all products and services offered by the company, for the sending of invoices related to the obligations derived from the contract entered between the parties, and to conduct surveys, studies, and/or confirmation of personal data necessary for the execution of a contractual relationship.</li> </ol>

		<p>3. Invitations to all kinds of events related to the promotion of products and services of the company (technical, advertising, and commercial information), as well as launches of new services.</p> <p>4. Conduct satisfaction surveys regarding the goods and services offered by SQDM S.A.S.</p> <p>5. Provide the services offered by SQDM S.A.S. and accepted in the signed contract.</p>
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<p>VENDORS</p>	<p>Names, surname, type of identification, identification number, date and place of issuance, marital status, signature, electronic signature, position held, telephone numbers, office address, email address, other identification documents, place and date of birth, age, etc.</p>	<ol style="list-style-type: none"> <li>1. Contact for the submission and payment of invoices and other documents related to contractual obligations within the relationship with the company.</li> <li>2. Preparation of internal reports on the compliance with obligations by the vendor.</li> <li>3. Transfer personal data outside the country to comply with anti-money laundering regulations applicable to them.</li> <li>4. Provide information to third parties with whom SQDM S.A.S. has a contractual relationship and to whom it is necessary to deliver it to fulfill the contracted object.</li> <li>5. In addition to the legal and contractual obligations that SQDM S.A.S. may have acquired.</li> </ol>
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<p>EMPLOYEES</p>	<p>Names, surnames, type and number of identity document, gender, city and home address, landline and mobile phone, email, marital status, nationality, fingerprint, photo, personal and commercial location data, blood type, photo, resume, work and/or family references, medical fitness concept, disciplinary/judicial records.</p>	<ol style="list-style-type: none"> <li>1. Fulfill the obligations contracted by SQDM S.A.S. with the Data Subject, regarding the payment of salaries, social benefits, and other remunerations established in the employment contract or as provided by law.</li> <li>2. Promotion of social welfare activities within the company (Information about loans, credits, and other promotions that the company may offer to its employees).</li> <li>3. Offer corporate wellness programs and plan business activities for the data subject and their beneficiaries (children, spouse, domestic partner, etc.).</li> <li>4. Use of image by the company for social welfare, marketing, or social responsibility activities, both internally and externally, including on social media.</li> </ol>
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## VII. RIGHTS OF THE DATA SUBJECTS

1. *Free access to the provided data that has been subject to processing.*
2. *Know, update, and rectify their information regarding partial, inaccurate, incomplete, fragmented data, which may lead to error, or those whose processing is prohibited or has not been authorized.*
3. *Request proof of the granted authorization.*
4. *Be informed by the data controller or the data processor, upon request, regarding the use given to the data subject's personal data.*
5. *Lodge complaints with the Superintendence of Industry and Commerce (SIC) for violations of the provisions of current regulation.*
6. *Revoke the authorization and/or request the deletion of the data, provided that there is no legal or contractual obligation preventing their elimination.*
7. *Refrain from answering questions about sensitive data. Responses regarding sensitive data or data about children and adolescents will be optional.*

## VIII. RESPONSIBLE AREA FOR HANDLING INQUIRIES AND COMPLAINTS

At SQDM S.A.S., the responsible area for handling requests, inquiries, and complaints will be the Data Protection Officer through the following channel of attention to the data subject:

ATTENTION VIA EMAIL



Our personal data protection officer will address any inquiries, concerns, complaints, or claims at the following address: [HabeasData@sqdm.com](mailto:HabeasData@sqdm.com) according to the parameters established in the following chapter.

## IX. CONSULTATION PROCEDURE

In compliance with the regulations on personal data protection, SQDM S.A.S. presents the procedure and minimum requirements for the exercise of your rights: For the submission and attention to your request, we ask you to provide the following information:

1. Full name and surname Contact information (Physical and/or electronic address and contact telephone numbers).
2. Means to receive a response to your request.
3. Reason(s)/fact(s) that give rise to the complaint with a brief description of the right you wish to exercise (know, update, rectify, request proof of the authorization granted, revoke it, delete, access the information).
4. Signature (if applicable) and identification number.

The maximum term established by law to resolve your complaint is fifteen (15) business days, counted from the day following the date of its receipt. If it is not possible to address the complaint within this term, SQDM S.A.S. will inform the interested party of the reasons for the delay and the date on which their complaint will be addressed, which in no case may exceed eight (8) business days following the expiration of the initial term.

If the complaint is incomplete, SQDM S.A.S. will request the interested party to remedy the deficiencies within five (5) business days following the receipt of the complaint. Two (2) months after the date of the request, if the requester has not provided the required information, SQDM S.A.S. will consider that the data subject or their assignee has withdrawn the complaint.

Once the terms established by Law 1581 of 2012 and other regulations or complementary norms have been fulfilled, the Data Subject to whom the exercise of the rights of access, updating, rectification, deletion, and revocation is denied, either totally or partially, may bring their case to the attention of the Superintendence of Industry and Commerce -Delegation for the Protection of Personal Data-

Data subjects are informed that the deletion or revocation of authorization for data processing will not proceed when the data subject has a legal or contractual obligation to remain in SQDM S.A.S.'s database.

**X. VALIDITY**

This personal data processing policy is dated December 27, 2021, and its last update is dated February 21, 2024. Its validity is indefinite.

PREPARED BY	REVIEWED BY	APPROVED BY
<p><i><u>Carlos Heredia</u></i> Carlos Heredia (02/21/2024 - 15:18 EST)</p> <p><b>Carlos Andres Heredia</b> Contract Analyst</p>	<p><i><u>Jenny Vallejo Af</u></i> Jenny Vallejo (02/21/2024 - 19:05 CST)</p> <p><b>Jenny Vallejo Afanador</b> Legal Representative</p>	<p><i><u>Jenny Vallejo Af</u></i> Jenny Vallejo (02/21/2024 - 19:05 CST)</p> <p><b>Jenny Vallejo Afanador</b> Legal Representative</p>











# CDE\_Política tratamiento de datos\_2024-02-21\_V04

Informe de auditoría final

2024-02-22

Fecha de creación:	2024-02-21
Por:	SQDM SAS (compras@sqdm.com)
Estado:	Firmado
ID de transacción:	CBJCHBCAABAA4liINWuoculmd8awnQ3LCNv2EEbqdPYvG

## Historial de “CDE\_Política tratamiento de datos\_2024-02-21\_V04”

-  SQDM SAS (compras@sqdm.com) ha creado el documento.  
2024-02-21 - 20:15:28 GMT- Dirección IP: 181.58.141.215.
-  El documento se ha enviado por correo electrónico a Jenny Vallejo (jennyvallejo@sqdm.com) para su firma.  
2024-02-21 - 20:15:33 GMT
-  El documento se ha enviado por correo electrónico a Carlos Heredia (carlosheredia@sqdm.com) para su firma.  
2024-02-21 - 20:15:33 GMT
-  Carlos Heredia (carlosheredia@sqdm.com) ha visualizado el correo electrónico.  
2024-02-21 - 20:17:24 GMT- Dirección IP: 181.58.141.215.
-  Carlos Heredia (carlosheredia@sqdm.com) ha firmado electrónicamente el documento.  
Fecha de firma: 2024-02-21 - 20:18:40 GMT. Origen de hora: servidor.- Dirección IP: 181.58.141.215.
-  Jenny Vallejo (jennyvallejo@sqdm.com) ha visualizado el correo electrónico.  
2024-02-22 - 1:05:49 GMT- Dirección IP: 107.200.230.147.
-  Jenny Vallejo (jennyvallejo@sqdm.com) ha firmado electrónicamente el documento.  
Fecha de firma: 2024-02-22 - 1:05:57 GMT. Origen de hora: servidor.- Dirección IP: 107.200.230.147.
-  Documento completado.  
2024-02-22 - 1:05:57 GMT