

PERSONAL DATA TREATMENT POLICY

INNODE recognizes the importance of protecting the privacy and rights of individuals whose personal data is processed by the company.

Therefore, this personal data processing policy establishes the principles and guidelines that INNODE follows when collecting, processing, storing and protecting the personal data of its users, clients, customers, employees, contractors and any other person whose data is processed by the company in the exercise of its activities, in accordance with Law 1581 of 2012, Decree 1074 of 2015 and other applicable regulations.

Below is the company's general information:

- E-mail: contacto@innodedata.com
- Web site: <https://innodedata.com/>

1. Scope:

This policy applies to all databases and/or files that include personal data of clients, collaborators, suppliers and other interested parties, which include personal data that are subject to custody and/or treatment by INNODE as responsible for its treatment.

2. Principles:

- Legality: The processing of personal data will be carried out in accordance with applicable laws and regulations.
- Purpose: Personal data will be collected for specified and legitimate purposes and will not be processed in a manner incompatible with those purposes.
- Data Minimization: Only personal data necessary for the purpose for which it is processed will be collected.

- Accuracy: Personal data will be accurate and, where necessary, updated. All reasonable steps will be taken to ensure that inaccurate data is rectified or deleted.
- Storage Limitation: Personal data will be stored for the time necessary to fulfill the purpose for which it was collected, and will be deleted when no longer needed, in accordance with the laws and regulations governing the retention of records according to the economic activity and type of information.
- Integrity and Confidentiality: Appropriate technical and organizational measures shall be implemented to ensure the security of personal data and protect against unauthorized or unlawful access, disclosure, loss, alteration or destruction.
- Accountability: Clear responsibilities shall be assigned to ensure compliance with the data processing policy.

3. Informed consent:

Explicit consent will be obtained from individuals before collecting and processing their personal data, unless the processing is justified by another legal basis.

4. Rights of Data Owners:

Data owners have the right to access, rectify, delete or oppose the processing of their personal data, for which INNODE guarantees the exercise of these rights.

5. Data transfers:

INNODE will ensure, where applicable, that any transfer of personal data complies with applicable laws and regulations and will provide adequate safeguards.

When for business reasons, it is required to make international transfer of data, INNODE will ensure an adequate level of protection of personal data, finding that in effect the numeral 3.2 of Chapter Three, Title V of the Sole Circular 005 of August 10, 2017 of the Superintendence of Industry and Commerce includes that country in the list of safe countries. In any case, in addition to having the express and unequivocal authorization by the data controller and INNODE will ensure that the action provides adequate levels of data protection and meets the requirements set in Colombia by the Habeas Data Regime.

6. Cookies Policy:

INNODE will inform users about the use of cookies and obtain their consent prior to their use, as required.

7. National Database Registry:

When necessary, INNODE shall register the databases it manages with the Superintendence of Industry and Commerce.

8. Protocol for the attention of requests to execute the rights of the owners.

The Data owner and/or data controller may exercise his/her rights by contacting INNODE through written communication sent to the following e-mail address: contacto@innodedata.com.

The requests submitted by the data owner or data controller in order to make a query or complaint about the use and handling of their personal data, must contain minimum specifications, in order to provide the owner with a clear and consistent response to the request.

The requirements of the request are:

- Be addressed to INNODE.
- Contain the identification of the owner or responsible party (full names and identification document).

- Contain the description of the facts that motivate the consultation or claim.
- The object of the request.
- Indicate the address of notification of the owner or responsible, physical and/or electronic (e-mail).
- Attach the documents to be asserted (especially for claims).

The owner or the person responsible for the data, or whoever is determined by stipulation in favor of another; may only file a complaint before the Superintendence of Industry and Commerce for the exercise of their rights once they have exhausted the process of Consultation or Claim directly before INNODE..

Queries:

The personal information of the Owner that is contained in INNODE's databases may be consulted and the organization will be responsible for providing all the information contained in the individual record or that is linked to the identification of the applicant.

The consultation, once received by INNODE, will be answered within a maximum term of 10 working days from the date of its receipt. When it is not possible to attend the consultation within said term, the interested party will be informed, stating the reasons for the delay and indicating when the request or consultation will be attended, which in no case may exceed five (5) working days following the expiration of the first term.

Claims:

When it is considered that the information contained in an INNODE database should be corrected, updated or deleted, or when there is an alleged breach of any of the duties contained in the Habeas Data Law, claims may be filed with INNODE, following the guidelines of the previous point.

Request for update and/or rectification:

INNODE will have to rectify and update, at the request of the owner or the person responsible for the data, the information that is inaccurate or incomplete, according to the procedure and terms indicated above, for which the owner or the person responsible for the data must submit the request to the e-mail address provided, indicating the update and rectification of the data and in turn must provide the documentation supporting such request.

Revocation of authorization and/or deletion of data

The owner or the person responsible for the data may revoke at any time the consent or authorization given for the processing of their personal data, provided that there is no impediment enshrined in a legal or contractual provision.

Likewise, the owner or the person responsible for the data has the right to request INNODE to delete or eliminate the personal data at any time when:

- Consider that they are not being treated in accordance with the principles, duties and obligations set forth in the regulations in vigor.
- They are no longer necessary or relevant for the purpose for which they were obtained.
- The time necessary for the fulfillment of the purposes for which they were obtained has expired.

Such deletion implies the total or partial elimination of the personal information, as requested by the owner in the records, files, databases or treatments carried out by INNODE.

The right of cancellation is not absolute and therefore INNODE may deny revocation of authorization or deletion of personal data in the following cases:

- The owner has a legal or contractual duty to remain in the database.
- The deletion of data hinders judicial or administrative proceedings related to tax obligations, the investigation and prosecution of crimes or the updating of administrative sanctions.
- The data is necessary to protect the legally protected interests of the owner; to carry out an action in the public interest, or to comply with an obligation legally acquired by the owner.

9. Review and Update:

policy will be reviewed periodically and updated as necessary to comply with changes in legislation or business practices.

This personal data processing policy is effective as of January 10, 2024 and applies to all INNODE activities related to the processing of personal data.

