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	PERSONAL DATA AND INFORMATION PROCESSING AUTHORIZATION	VERSION: 0P1
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1.0 OBJECTIVE

Set forth the conditions of organization, obligations of those involved and participants in the treatment and use of personal information, and the applicable procedures for the treatment of personal data that LABORATORIOS ECAR S.A. must request, use, store, correct, transfer or delete in the development of its own functions as a Pharmaceutical Laboratory.

2.0 SCOPE


This policy on personal data and information processing authorization will apply to all personal data registered in databases and/or files susceptible to treatment by LABORATORIOS ECAR S.A. Personal data also includes images, recordings, and/or sounds captured by video surveillance cameras located within the company's facilities and will receive the same treatment. For all legal purposes, LABORATORIOS ECAR S.A. adopts the definitions contained under Article 3 of Law 1266 of 2008, Law 1581 of 2012, and Decree 1377 of 2013. This procedure applies to all employees of LABORATORIOS ECAR S.A.

3.0 DEFINITIONS


- 3.1 **Authorization:** A prior, express, and informed consent of the owner to conduct the processing of personal data.
- 3.2 **Privacy Notice:** A verbal or written communication generated by the responsible party, addressed to the owner for the processing of their personal data, through which they are informed about the existence of the information treatment policies that will be applicable to them, the way to access them, and the purposes of the treatment intended for personal data.
- 3.3 **Database:** An organized set of personal data subject to processing.
- 3.4 **Personal Data:** Any information linked or that can be associated with one or more identified or identifiable natural persons.
- 3.5 **Data Processor:** A natural or legal person, public or private, who, by themselves or in association with others, conducts the treatment of personal data on behalf of the data controller. In cases where the controller does not function as the data processor, the data processor will be expressly identified.
- 3.6 **Data Controller:** A natural or legal person, public or private, who, by themselves or in association with others, decides on the Database and/or the Processing of data.
- 3.7 **Terms and Conditions:** A general framework that sets forth the conditions for participants in promotional or related activities.
- 3.8 **Owner:** A natural person whose personal data is subject to processing.
- 3.9 **Treatment:** Any operation or set of operations on personal data, such as collection, storage, use, circulation, or deletion.
- 3.10 **Transfer:** A transfer of data takes place when the data controller and/or data processor, based in Colombia, sends information or personal data to a recipient, who in turn is responsible for the treatment and is located inside or outside the country.
- 3.11 **Transmission:** A personal data processing that involves the communication of such data within or outside the territory of the Republic of Colombia when its purpose is the performance of processing by the data processor on behalf of the data controller.

4.0 GENERAL CONDITIONS

- 4.1 The data controller for personal data is LABORATORIOS ECAR S.A., with address at Carrera 44 # 27-50, Medellin (Antioquia), Colombia. e-mail: protecciondedatos@ecar.com.co; telephone: +604 448-3227, under the responsibility of the Legal and Collections Department.
- 4.2 LABORATORIOS ECAR S.A.S, in compliance with the regulatory framework, guarantees the comprehensive protection of fundamental rights of Habeas Data and other rights contained

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- under TITLE IV, Law 1581 of 2012, to all owners of personal information for which it is responsible and/or in charge of its processing.
- 4.3 The company acts as a guarantor of fundamental rights to a good name and privacy, within the framework of its commitment to the values of respect, compliance with the law, confidentiality, availability, integrity, and proper handling of information.
 - 4.4 LABORATORIOS ECAR S.A. is directly responsible for the processing of personal data; however, it reserves the right to delegate such processing to a third party, demanding from the processor the proper attention and implementation of guidelines and procedures suitable for the protection of personal data and strict confidentiality thereof.
 - 4.5 The company adopts and applies this internal procedure of policies and procedures for the processing and protection of personal data, under which, acting as the data controller, it will seek the proper development of its commercial activities and the strengthening of its relationships with third parties, being authorized to collect, store, use, circulate, and/or delete personal data corresponding to natural persons with whom it has or has had any type of commercial and/or labor relationship, including, without limitation, its employees and their families, shareholders, consumers, customers, distributors, suppliers, creditors, and debtors.
 - 4.6 Personal data is processed by LABORATORIOS ECAR S.A., for the following purposes:
 - For sending information to its employees and chemists;
 - For the provision of health services to LABORATORIOS ECAR S.A. employees;
 - For the recognition, protection, and exercise of the rights of LABORATORIOS ECAR S.A. shareholders;
 - For strengthening relationships with its consumers and customers, through the sending of relevant information, order taking, and the handling of Requests, Complaints, Claims, and Suggestions (PQRS) by the customer service department, the evaluation of the quality of its customer service, and the invitation to events organized or sponsored by LABORATORIOS ECAR S.A., among others;
 - 4.6.1 For interaction with its distributors, for the verification of compliance with distribution standards, their legal obligations to their employees, and the invitation to events organized or sponsored by LABORATORIOS ECAR S.A., among others;
 - 4.6.2 To consolidate timely and quality supply with its suppliers, through the invitation to participate in selection processes, the evaluation of compliance with their obligations, and the invitation to events organized or sponsored by LABORATORIOS ECAR S.A., among others;
 - 4.6.3 For the verification of balances of its debtors and creditors;
 - 4.6.4 For the determination of pending obligations, requests and suggestions for financial information and credit history, and reporting to information centers on non-compliant obligations regarding its debtors;
 - 4.6.5 To improve, promote, and develop its products.
 - 4.6.6 For marketing activities, statistics, research, and other commercial purposes that do not contravene current legislation in Colombia.
 - 4.6.7 For the attention of judicial or administrative requirements and compliance with judicial or legal mandates;
 - 4.6.8 To eventually contact, via e-mail or any other means, natural persons with whom it has or has had a relationship, without the enumeration implying limitation, employees and their families, shareholders, consumers, customers, distributors, suppliers, creditors, and debtors, for the aforementioned purposes;
 - 4.6.9 For the recognition, exercise, or defense of a right in a judicial process.
 - 4.6.10 The processing has a historical, statistical, or scientific purpose or, within the framework of improvement processes; the latter, provided that measures are taken to suppress the identity of the data subjects or the data itself.
 - 4.7 All contractual and legal adjustments will be made so that compliance by employees, members, directors, suppliers, linked contractors, and other third parties is incorporated into contracts, confidentiality agreements, contractual clauses, and other documents, in addition to seeking express authorization from each data subject for the handling of personal data and habeas data.

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- 4.8 Natural persons whose personal data is processed by LABORATORIOS ECAR S.A. have the following rights, which they can exercise at any time:
- 4.8.1 To know the Personal Data that LABORATORIOS ECAR S.A. is processing. Likewise, the data subject may request at any time that their data be updated or rectified; for instance, if they find that their data is partial, inaccurate, incomplete, fragmented, misleading, or if its processing is expressly prohibited or has not been authorized.
 - 4.8.2 To request proof of the authorization granted to LABORATORIOS ECAR S.A. for the processing of their Personal Data.
 - 4.8.3 To be informed by LABORATORIOS ECAR S.A., upon request, regarding the use it has made of their Personal Data.
 - 4.8.4 To file complaints with the Superintendence of Industry and Commerce for infringements of the provisions of the Personal Data Protection Law.
 - 4.8.5 To request from LABORATORIOS ECAR S.A. the deletion of their personal data and/or revoke the authorization granted for their processing, by submitting a claim, following the procedures established under numeral 11 herein. Nevertheless, information deletion and authorization revocatory shall not be applicable when the owner of the information has a legal or contractual obligation to remain in the database and/or files, nor while the relationship between the Owner and LABORATORIOS ECAR S.A. is in force, by virtue of which their data was collected.
 - 4.8.6 Access their personal data subject to processing for free. When the queries exceed one per month, LABORATORIOS ECAR S.A. may charge the owner for shipping, reproduction, and, if applicable, certification of documents.

5.0 RESPONSIBILITIES

- 5.1 The Legal area of LABORATORIOS ECAR S.A. is responsible for the development, implementation, training, and compliance with this Policy.
- 5.2 It is the responsibility of account executives to request authorization from the customer for the processing of their personal data.
- 5.3 It is the responsibility of the Logistics and Purchasing area to send the authorization for the processing of personal data to the supplier.
- 5.4 All officials who process Personal Data in the different areas of LABORATORIOS ECAR S.A. are obliged to report these databases to the legal area and to immediately forward to it all requests, complaints, or claims received from the owners of personal data.
- 5.5 It is the responsibility of the Integrated Management area to manage requests, complaints, claims, and suggestions, in which the Information Holder can exercise their rights to know, update, rectify, and delete the data, and revoke the authorization.
- 5.6 It is the responsibility of the Human Resources area to ensure that at the time of the incorporation of a new employee, the knowledge of this internal procedure of policies and procedures for the processing and protection of personal data, as well as the accompanying documents, is socialized and verified.

6.0 DESCRIPTION OF ACTIVITIES

- 6.1 The Human Resources area, once it requests the necessary documents from the applicant for entry into the company, must also request the completion of the JCAG-00002-2 Prior Authorization for Employee Information Processing Form.
- 6.2 When collecting documents for customer creation, account executives must also request the completion of the JCAG-00002-1 Prior Authorization for Customer and/or Supplier Information Processing Form. Applies to cash and credit customers.
- 6.3 The Logistics and Purchasing area will send the JCAG-00002-1 Prior Authorization for Customer and/or Supplier Information Processing Form to the third party along with the other necessary documents for their registration as a supplier of the company.

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6.4 Data subjects whose personal data is being collected, stored, used, and circulated by LABORATORIOS ECAR S.A. may exercise their rights to know, update, rectify, and delete information, and revoke the authorization at any time. For this purpose, the following procedure will be followed in accordance with the personal data protection law:

6.4.1 **Attention and Response to Requests and Suggestions:** Data owner, or his/her successors, may request from LABORATORIOS ECAR S.A., through the means indicated below:

Update and rectify their personal data as the data subject.

Information about their rights as the data subject.

Information about the personal data of the data owner that is subject to processing.

6.4.1.1 Access to images, recordings, and/or sounds captured by video surveillance cameras located in the company's facilities. When the image or recording shows one or more data owner, LABORATORIOS ECAR S.A. must have the prior authorization of said third parties for the delivery of the personal data to the requesting party; if the authorization of the third parties to disclose the requested personal data is not obtained, LABORATORIOS ECAR S.A. will guarantee the anonymization of the data of the third parties and will blur or fragment the images or recordings when such third parties appear, avoiding their maximum exposure.

6.4.1.2 In this case, the person responsible for the processing of personal data may request the requesting person to provide a personal identification document in order to verify their status as the data owner, which in any case must coincide with the information contained in the attached forms as applicable.

6.4.1.3 Request proof of the authorization granted to LABORATORIOS ECAR S.A. for the processing of their personal data.

6.4.1.4 Information regarding the use that LABORATORIOS ECAR S.A. has given to the personal data.

6.4.1.5 Deletion of Personal Data, provided that there is no legal or contractual obligation preventing it.

6.4.1.6 Revocation of the authorization for the processing of their personal data when constitutional and legal principles, rights, and guarantees are not respected.

6.4.1.7 **Means Enabled for the Submission of Requests and Suggestions:** LABORATORIOS ECAR S.A. has made available the following means for the reception and attention of requests and suggestions, all of which allow for the preservation of evidence thereof:

Communication addressed to LABORATORIOS ECAR S.A., Carrera 44 # 27-50 in the city of Medellin.

Request submitted to the e-mail address: protecciondedatos@ecar.com.co.

Requests may be submitted once per month or when there are substantial modifications to the information processing policies that warrant new inquiries.

6.4.1.8 **Attention and Response by LABORATORIOS ECAR S.A.:** Requests and suggestions will be addressed within a maximum period of ten (10) business days from the date of receipt. If it is not possible to address the request and suggestions within said period, the interested party will be informed, stating the reasons for the delay and indicating the date on which their request and suggestions will be addressed, which in no case may exceed five (5) business days following the expiration of the initial period.


6.4.1.9 **Attention and Response to Complaints and Claims:** Data owner or their successors may request LABORATORIOS ECAR S.A., through a complaint or claim submitted through the channels indicated below:

The correction or updating of information.

The deletion of their personal data or the revocation of the authorization granted for its processing.

The rectification or correction of the alleged non-compliance with any of the duties contained in the personal data protection law.

The request must contain a description of the facts giving rise to the complaint or claim, the address and contact information of the applicant, and must be accompanied by the documents that they wish to assert.

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6.4.1.10 **Means Enabled for the Submission of Complaints and Claims:** LABORATORIOS ECAR S.A. has made available the following means for the reception and attention of complaints and claims, all of which allow for the preservation of evidence of their submission: Communication addressed to LABORATORIOS ECAR S.A., Carrera 44 #. 27-50 in the city of Medellin.

Request submitted to the e-mail address: protecciondedatos@ecar.com.co.

6.4.1.11 **Attention and Response by LABORATORIOS ECAR S.A.**

If the complaint or claim is submitted incomplete, LABORATORIOS ECAR S.A. must request the interested party to remedy the deficiencies within five (5) days following the receipt of the complaint or claim. If two (2) months have elapsed since the date of the request without the applicant submitting the requested information, it will be understood that they have withdrawn the complaint or claim.

If the recipient of the complaint or claim is not competent to resolve it, it will be forwarded to the legal department within a maximum period of two (2) business days, and the interested party will be informed of the situation.

Once the complaint or claim is received in its entirety, a legend stating, "claim in process" and the reason for it will be included in the Database, within a period not exceeding two (2) business days. Said legend must be kept until the complaint or claim is decided.

The maximum period for addressing the complaint or claim will be fifteen (15) business days from the day following the date of its receipt. If it is not possible to address the complaint or claim within said period, the interested party will be informed of the reasons for the delay and the date on which their complaint or claim will be addressed, which in no case may exceed eight (8) business days following the expiration of the initial period.

6.5 Term and updates:

This personal data protection policy has been in effect since September 2016 and will have the same validity as the period during which the purpose or purposes of the processing are maintained in each database, or the validity period indicated by a specific legal, contractual or jurisprudential cause.

Updates to the policy: LABORATORIOS ECAR S.A. may modify the terms and conditions of this document of policies and procedures as part of our effort to comply with the obligations set forth by Law 1581 of 2012, its regulatory decrees and other rules that complement, modify or repeal the content of this document, in order to reflect any changes in our operations or functions. In such cases, the new document of policies and procedures will be published on our website: www.ecar.com.co.

7.0 RECORDS

7.1 JCAG-00002-1 Prior Authorization for the Processing of Customer and/or Supplier Information Form

7.2 JCAG-00002-2 Prior Authorization for the Processing of Employee Information Form.

8.0 BIBLIOGRAPHY

8.1 Political Constitution (Arts. 15 and 20)

8.2 Law 1266 of 2008

8.3 Statutory Law 1581 of 2012

8.4 Decree 1377 of 2013


8.5 Decree 1074 of 2015

8.6 Other regulatory and complementary decrees on the subject.

9.0 ANNEXES

9.1 NA

CHANGE CONTROL

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CODE AND PREVIOUS VERSION	CHANGES	DATE OF CHANGE
POLICY MANUAL FOR TREATMENT AND PROTECTION OF PERSONAL DATA Version 01	<p>Change from manual to procedure and remove the word "manual" from the document title.</p> <p>Assign the code JCAG-00002.</p> <p>The numbering is changed to the structure defined in GIMD-00001-1 as follows:</p> <p>1.0 OBJECTIVES 2.0 SCOPE 3.0 DEFINITIONS 4.0 GENERAL CONDITIONS 5.0 RESPONSIBILITIES 6.0 DESCRIPTION OF ACTIVITIES 7.0 RECORDS 8.0 BIBLIOGRAPHY 9.0 ANNEXES</p> <p>In section 2.0 of the manual, add that images, recordings, and/or sounds captured by video surveillance cameras located in company facilities will have the same processing of personal data. Adopt the definitions contained in some regulations.</p> <p>Modify the section regarding the processing and purpose of personal data, now in section 4.0.</p> <p>Regarding the rights of data subjects, replace the word "company" with "LABORATORIOS ECAR S.A."</p> <p>Modify the company's phone number in section 4.1.</p> <p>Add the responsibility of the Human Resources department, Account Executives, and the Logistics and Purchasing department to the procedure.</p> <p>In the description of activities, include the corresponding information for the Human Resources department, Logistics and Purchasing department, and Account Executives.</p> <p>Remove the content of sections 8, 9, 10, 12, 13, 14, and 15 from the manual.</p> <p>Remove the manual annexes, which will now be JCAG-00002-1 Form (previously Annex 1) and JCAG-00002-2 Form (previously Annex 2).</p>	10-04-2022

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Date: 10/04/2022	Date: 10/04/2022	Date: 10/10/2022