

POLICY ON PERSONAL DATA PROCESSING

PROQUIMCOL S.A., a company located in Barbosa and identified with NIT 811.027.846-3, situated at Autopista Norte Km 27, Barbosa, Antioquia, is committed and responsible for the privacy of information collected by the company in the course of its business activities. This information is obtained through administrative, commercial, civil, labor-related, and other relationships, in accordance with the terms of Law 1581 of 2012, Decree 1377 of 2013, and Decree 886 of 2014. The following "POLICY ON PERSONAL DATA PROCESSING" has been adopted to ensure that all individuals directly or indirectly associated with the company, currently handling personal data in our database or those that may be collected in the future through any of the information collection methods available to PROQUIMCOL S.A., are familiar with the procedure for collecting, storing, and processing personal data, as well as the rights, guarantees, and procedures to enforce them:

I. DEFINITIONS OF INTEREST:

- **Personal Data:** Any information linked or that can be associated with various specific or determinable natural persons.
- **Database:** A set of organized and systematized personal data for subsequent processing.
- **Authorization:** Express, prior, and informed consent of the data subject for processing.
- **Processing:** Operations or activities that can be carried out with personal data, including collection, use, copying, transfer, transmission, or deletion.
- **Sensitive Data:** Data that affects the privacy of the Data Subject or whose misuse could lead to discrimination, such as information revealing racial or ethnic origin, political orientation, religious or philosophical beliefs, membership in unions, human rights organizations, or promoting the interests of any political party. This also includes data related to health, sexual life, and biometric data.

II. PURPOSE OF PERSONAL DATA PROCESSING

1. The information provided by the data subject will be included in our database and used for the following purposes:

For Shareholders:

- Notification of Ordinary and Extraordinary General Assemblies or other types of communications to company shareholders.
- Notification of the declaration and distribution of company profits, as well as payment of dividends to shareholders.

For Suppliers:

- Purchase of goods and services.
- Notification of the cancellation of obligations to suppliers.
- Communication about invoice receipt dates.
- Various commercial communications.

- Execution of the existing contractual relationship with suppliers, including the payment of contractual obligations.
- Basic administration tasks.

For Customers:

- Provision of products and services required by customers.
- Notification, through any means (physical mail, email, mobile device, text messages), of promotions, news, current and future products and services related to events, contests, promotional activities, and other commercial purposes directly or indirectly related to the business.
- Sending commercial, advertising, or promotional information about products and services through any means (physical mail, email, mobile device, text messages). Information about commercial events and promotions to drive, invite, direct, execute, inform, and generally carry out commercial campaigns, promotions, or contests.
- Evaluation of the quality of our products and/or services.
- Information about the status of orders or requests.
- Addressing complaints and claims.
- Analyzing and measuring the quality of products and services offered.
- Granting credit limits, informing about account status.
- Basic administration tasks.
- Any other purpose resulting from the development of the contract or the relationship between you and the company.
- Carrying out collection activities related to obligations incurred by the data subject.

For Employees:

- Storing contact and profile information for all direct employees of the company.
- Sending communications related to labor and company-related matters of interest.
- Personnel selection purposes, contractual process, affiliations to the Social Security System, compensation process, payroll settlement process, compliance with Colombian or foreign law, and orders from judicial or administrative authorities.
- Supporting internal or external audit processes.
- Granting credit limits, informing about account status.
- Implementing the Occupational Health and Safety Management System (SGSST), including socio-demographic information, health conditions, and other required information.
- Basic administration tasks.
- Any other purpose resulting from the development of the contract or the relationship between you and the company.

In General:

- Sending information related to PROQUIMCOL S.A., in relation to its customers, suppliers, shareholders, employees, in accordance with the existing contractual relationship.
- Fulfilling obligations contracted by the data subject with the company.
- Other activities related to the development of the company's corporate purpose that necessarily require the use of personal data of the data subject.
- Complying with information duties imposed by legal mandate, court decision, or competent authority.
- Contacting the data subject in case there is a risk to the protection of their personal data.

III. PROCESSING OF PERSONAL DATA

PROQUIMCOL S.A. is responsible for the processing of personal data of its employees, shareholders, suppliers, customers, distributors, business partners, affiliated companies, and users. Therefore, it complies with the obligations arising from this condition.

The processing of personal data will be carried out in accordance with the authorization issued by the data subject or in accordance with the terms established in current legislation for this purpose.

IV. RESPONSIBLE FOR THE PROCESSING OF PERSONAL DATA

The internal manual of policies and procedures for the processing of personal data defines those responsible for complying with Data Protection Law and observing this Policy. In the case of PROQUIMCOL S.A., the responsible party is the Administrative Management.

Specific information about the Company is:

PROQUIMCOL S.A., identified with NIT 811.027.846-3, established by Deed No. 656 of March 29, 2001, from Notary 7th of Medellín, initially registered at the Chamber of Commerce of Medellín for Antioquia on April 19, 2001, in Book 9, Folio No. 537, under No. 3756.

Located at Calle 79 Sur # 47E – 62 Office 301, ACIC Building

Phone: (4) 4440402

Email: proquimcol@proquimcol.com

Responsible Party: Administrative Management

V. MANNER IN WHICH PERSONAL DATA IS OBTAINED

Activities related to the collection and storage of personal data can be carried out through physical mail, email, mobile devices, websites, or any digital or similar communication mechanism known or through the voluntary and direct provision of personal data by the data subject to PROQUIMCOL S.A. through various aforementioned means.

VI. PERSONAL DATA STORED

The personal data stored by PROQUIMCOL S.A. depends on the direct or indirect relationship that the data subject has with the company. For this purpose, it may be necessary to obtain the data subject's name, address, phone number, residence address, email, date of birth, professional activity, among others. This information will be used for the purposes described in this privacy and personal data protection policy.

VII. DUTIES OF THE RESPONSIBLE PARTY FOR PERSONAL DATA

- Effectively guaranteeing the data subject's rights to exercise their rights in accordance with Law 1581 of 2012, Decree 1377 of 2013, and Decree 886 of 2014.
- Requesting and retaining proof of the data subject's authorization for the processing of their data.
- Informing the data subject about the purpose of processing their data and the protection policies adopted for it.
- Retaining personal data according to the purpose for which it was collected and under appropriate security conditions, aiming to prevent alteration, loss, consultation, use, or unauthorized access by third parties.
- Updating personal data in accordance with the instructions or requests that will be required by the data subject.
- Rectifying personal data when supplied or described incorrectly.
- Processing and responding to inquiries and claims within the terms indicated by Law 1581 of 2012 and Decree 1377 of 2013.
- Adopting an internal manual of policies and procedures to ensure the proper processing of personal data.
- Keeping the data subject informed of the status of personal data when certain information is under discussion by the data subject.
- Implementing personal data security measures, following the instructions given by the Superintendence of Industry and Commerce on the matter.
- Complying with instructions and requirements issued by the Superintendence of Industry and Commerce.
- In general, processing personal data in accordance with the authorization given by the data subjects and addressing the purposes and objectives established in Law 1581 of 2012, Regulatory Decree 1377 of 2013, and Decree 886 of 2014.

VIII. RIGHTS OF THE DATA SUBJECT AND THEIR ABSOLUTE LACK, TO THEIR HEIRS

In terms of Law 1581 of 2012 and Decree 1377 of 2013, the rights of the data subject and, in their absolute absence, their heirs, are as follows:

- Right to consult their personal data free of charge and to know if they are being processed by the responsible party.
- Right to request the update, rectification, and deletion of their personal data at any time.
- Right to revoke the authorization given to the responsible party for the processing of their personal data at any time.
- Right to request proof at any time that proves the existence of the authorization given to the responsible party for the processing of their personal data.
- Right to file complaints with the Superintendence of Industry and Commerce for violations of Law 1581 of 2012 and other regulations that modify, add, or complement it.
- Right to be informed by PROQUIMCOL S.A. about the use of their personal data.
- Other rights provided by national legislation.

IX. MEANS BY WHICH THE DATA SUBJECT AUTHORIZES THE PROCESSING OF THEIR PERSONAL DATA

Data subjects may authorize or not authorize the responsible party to process their data through the authorization given in the communication sent.

In case of not receiving an expression from the data subject, within 30 business days after receiving the communication, including the respective authorization form for the processing of personal data, PROQUIMCOL S.A. will understand that it is authorized to continue processing their personal data until the data subject expressly expresses otherwise.

X. HOW THE DATA SUBJECT CAN EXERCISE THEIR RIGHTS

The data subject, who hereby authorizes the use of their personal data, may access the provided data at any time, as well as request the correction, updating, deletion, or revocation of this authorization, in terms of Law 1581 of 2012, Decree 1377 of 2013, and Decree 886 of 2014. The interested party may go to the offices of PROQUIMCOL S.A., located at Calle 79 Sur # 47E – 62 Office 301, ACIC Building, or send an email to proquimcol@proquimcol.com. The request will be processed within the terms established by law.

The request must contain, at least, the following information:

- Identification of the data subject.
- Description of the facts that give rise to the consultation, suggestion, claim, or complaint.
- Terms of the request.
- Address for notification.

XI. TRANSFER AND INTERNATIONAL TRANSMISSION OF PERSONAL DATA

Transfer and international transmission of personal data will comply with the provisions of Article 24 of Decree 1377 of 2013.