

PERSONAL INFORMATION HANDLING POLICY

Interested in protecting the information and privacy of those visiting its webpage and protecting those who have voluntarily delivered their personal information, **PARRA GONZÁLEZ ABOGADOS SAS.** has developed the following Personal Information Handling Policy, which it is hereby disclosing together with rights and procedures established for proper and effective exercise of rights held by its owners.

The purpose of this policy is setting forth terms and conditions for handling and managing personal information, describing the type of information obtained from its website www.parranietoabogados.com, as well as information that personally and in development of its activity it obtains from its clients, including the manner in which such information is to be used and to whom and in which cases it will be disclosed. These guidelines will apply to **PARRA GONZÁLEZ ABOGADOS SAS** and to its entrepreneurs, employees, and contractors.

The information handling and privacy policies are included in the following clauses:

ONE - RESPONSIBLE PERSON

The only legal person responsible for personal information obtained through the various channels is:

PARRA GONZÁLEZ ABOGADOS SAS.

Tax identification number 900.438.181-0

Maine address: Av. Carrera 15 No. 88 – 64 Oficina 619

Telephone: (57 1) 7460660

Headquarters: Bogotá D.C

Webpage: www.parranietoabogados.com

email: gerencia@parranietoabogados.com

TWO - OBJECT

Guaranteeing the constitutional right every natural or legal person has to know, update, and rectify information obtained, stored, corrected, deleted, and updated regarding them and contained in the **PARRA GONZÁLEZ ABOGADOS SAS** databases or files, obtained for the following purposes indicated in the respective authorizations:

INFORMATION COLLECTION. Personal information authorized by the user.

PARRA GONZÁLEZ ABOGADOS SAS may obtain information related to its clients as follows:

- Information obtained directly.
- Information obtained whenever clients visit the www.parranietoabogados.com website.

- Information obtained whenever the client visits the **PARRA GONZÁLEZ ABOGADOS SAS** offices.

The information obtained is limited to the following:

Full Name

Landline

Mobile phone number

ID number

Email

Neighborhood

Address (house or apartment)

City

THREE - REGARDING THE NATURE AND FUNCTIONS TYPICAL OF PARRA GONZÁLEZ ABOGADOS SAS

According to Law 1581 of 2012 and Decree 1377 of 2013, Circular 002 of November 3 of 2015 from the Industry and Trade Superintendence, and according to authorizations given by the information owners, personal information will be handled in order to perform any legal economic activity, both in Colombia and abroad, according to conditions established for such purpose, among others those contained in the May 20 of 2011 assembly's private document, registered on May 25 of 2011 under number 1481816 of Book IX of the Bogotá DC Chamber of Commerce, and other norms amending, appending, replacing, or supplementing them.

Regarding the **PARRA GONZÁLEZ ABOGADOS SAS** operation:

- **Human Resources:** The information will be handled for hiring purposes, performance of responsibilities, provision of services, or termination, depending on the type of legal relationship existing with **PARRA GONZÁLEZ ABOGADOS SAS** (among others, this includes officials, former officials, trainees, and those applying to a company position).
- **PARRA GONZÁLEZ ABOGADOS SAS suppliers and contractors:** The information will be handled for purposes related to development of the contractual management process of legal services **PARRA GONZÁLEZ ABOGADOS SAS** provides to its clients.
- There are four categories for **PARRA GONZÁLEZ ABOGADOS SAS**: employees, service provision, clients, and suppliers.

FOUR - ACCEPTANCE

The human resources user in the company, client, supplier, contractor, accepts that the information provided upon registering or delivering the information will be handled by **PARRA GONZÁLEZ ABOGADOS SAS** in the manner and with the purposes indicated above. Should the information be delivered for administrative, accounting, or legal purposes through any of the mechanisms offered to the client or user, it will be understood

that upon being registered or delivering the information it explicitly approves the sending of such type of contents.

FIVE - AUTHORIZATIONS

The manner in which **PARRA GONZÁLEZ ABOGADOS SAS** handles personal information, as indicated in clause 2, requires of the free, explicit, prior (or at least concurrent), and informed authorization of the information owner. In its condition of party responsible for handling personal information, **PARRA GONZÁLEZ ABOGADOS SAS** has implemented the necessary mechanisms to obtain the authorization from the information owners, in any case guaranteeing that it will be possible to confirm that such authorization has been given.

PARAGRAPH: MANNER AND MECHANISMS TO PROVIDE THE AUTHORIZATION

The authorization may be given in hard copy or electronically, depending on the manner in which it was obtained, always guaranteeing its subsequent availability. To this effect, **PARRA GONZÁLEZ ABOGADOS SAS** has implemented the necessary mechanisms to keep proper technical or technological records or mechanisms and describe the manner in which it obtained the authorization from the personal information owners for its handling.

SIX - COMMITMENT

Without prejudice to the above authorizations by the user/client, **PARRA GONZÁLEZ ABOGADOS SAS** undertakes to meet its obligation of keeping secret personal information, confirming the obligation it has to treat it confidentially, for this purpose implementing the technical, organizational, and security measures required to prevent its altering, loss, or unauthorized handling or access, according to the law and international treaties Colombia subscribes to and applicable to this issue.

SEVEN - USER RESPONSIBILITY

The user, client, supplier, or contractor will in any case respond for the accuracy of the information provided, **PARRA GONZÁLEZ ABOGADOS SAS** reserving the right to exclude from registered services any user/client having provided false information.

EIGHT - INFORMATION OWNER RIGHTS

In its condition of information owner and according to Law 1581 of 2012, the user, client, supplier, or contractor will have the following rights:

1. Knowing, updating, and rectifying its personal information before **PARRA GONZÁLEZ ABOGADOS SAS**. This right may be exercised, among others, regarding partial, inaccurate, incomplete, or fractioned information possibly leading to errors, or information whose handling is explicitly prohibited or has not been authorized.

2. Request evidence regarding the authorization given by **PARRA GONZÁLEZ ABOGADOS SAS**, unless this has been explicitly excepted as being a requirement for such handling, according to article 10 of Law 1581 of 2012.
3. Be informed by **PARRA GONZÁLEZ ABOGADOS SAS**, subject to prior request, of the use given to its personal information.
4. File complaints to the Superintendence of Industry and Trade regarding violations of conditions contained in this law and in other norms amending, appending, or supplementing it.
5. Revoke the authorization and/or request deleting the information should upon it being handled legal and constitutional principles, rights, and guarantees not be respected. Such rescission and/or suppression will apply once the Superintendence of Industry and Trade has established that, upon handling the information, **PARRA GONZÁLEZ ABOGADOS SAS** has failed to follow conditions contained in this law and in the Constitution.
6. Freely access personal information being handled.

NINE - PROCEDURE FOR EXERCISING THE INFORMATION OWNER'S RIGHTS

The right to know, update, correct, and delete personal information handled by **PARRA GONZÁLEZ ABOGADOS SAS**, and to revoke the authorization or request evidence regarding same, may be exercised with a written notice addressed to the **PARRA GONZÁLEZ ABOGADOS SAS** Manager, responsible for handling such requests, complaints, claims, and/or questions, sent to the following address: Av. Carrera 15 No. 88 – 64 Oficina 619, Bogotá D.C., calling (571) 746-0660, or sending an email to gerencia@parranietoabogados.com.

The information owner will provide his/its full name and ID number, together with the physical and/or electronic address where the reply will be received. The issue will be handled within the 10 business days following its receipt. Should it not be possible to meet the above deadline, the respective information owner will be informed, explaining the reasons for the delay and indicating the expected delivery date, without ever exceeding 5 business days after the end of the first deadline.

The procedure contained in article 15 of Law 1581 of 2012 will apply to claims, deletions of personal information, and/or requests for rescission of the authorization given for handling of such information.

TEN - GENERAL PROHIBITION

No **PARRA GONZÁLEZ ABOGADOS SAS** client may obtain personal information related to other users for commercial purposes or purposes contrary to the law. The use of any automatic devices, bots, trackers, data compromising tools, or similar elements to unload information from our web portal (subject to supplementing) is prohibited.

ELEVEN - REQUIREMENTS FROM THE AUTHORITIES

PARRA GONZÁLEZ ABOGADOS SAS will cooperate with the competent authorities in order to ensure compliance with laws related to industrial property protection, copyrights, fraud prevention, and other issues.

The information owners explicitly authorize **PARRA GONZÁLEZ ABOGADOS SAS** to provide personal information regarding them, in order to comply with any requirement from the competent authorities and cooperate with them inasmuch as discretionally considered necessary and proper with respect to any investigation carried out regarding an illegal act, a violation of the Consumer Statute norms, a violation of intellectual or industrial property rights, or other activities being illegal or subjecting **PARRA GONZÁLEZ ABOGADOS SAS** to any legal liability.

TWELVE - SPECIAL CONSIDERATIONS FOR HANDLING CHILDREN AND YOUNGSTERS' INFORMATION

According to article 7 of Law 1581 of 2012, **PARRA GONZÁLEZ ABOGADOS SAS** declares that it will not in any way handle personal information of children and youngsters not considered being public persons.

Regarding information of children and youngsters considered being public persons, **PARRA GONZÁLEZ ABOGADOS SAS** will in all cases meet the following parameters and requirements: i) respond and respect the higher interest of children and youngsters and ii) guarantee the respect of their fundamental rights. Regarding the authorization, it will be given previously, explicitly, and in a properly informed manner by the legal representative of the child or youngster, first allowing the minor to exercise his/her right to be listened. Access by minors to the www.parranietoabogados.com webpage is not allowed. Should the above conditions not be followed, **PARRA GONZÁLEZ ABOGADOS SAS** will not be held liable for legal consequences arising from such default.

In no case will the **PARRA GONZÁLEZ ABOGADOS SAS** services provision depend on the information being supplied should the owner be a minor.

THIRTEEN - INFORMATION SECURITY

PARRA GONZÁLEZ ABOGADOS SAS undertakes to protect its clients' personal information. It has thus implemented adequate physical, administrative, and technical procedures to protect such personal information against loss, improper use, or changes, guaranteeing that only those being properly authorized will have access to it.

PARRA GONZÁLEZ ABOGADOS SAS guarantees that access to personal information will only be allowed to persons related to the purposes indicated in this policy.

FOURTEEN - ACCEPTANCE OF THE POLICY TERMS AND CONDITIONS

Upon visiting www.parranietoabogados.com or giving your approval to handle your personal information in any other manner, you are hereby accepting conditions described in this document. **PARRA GONZÁLEZ ABOGADOS SAS** will not be held liable for

policies, the contents, and the practices of other companies accessed through our web portal.

FIFTEEN - CHANGES IN THE INFORMATION HANDLING POLICY

PARRA GONZÁLEZ ABOGADOS SAS reserves the right to amend these information handling policies. It will timely notify the information owners before such changes are made, including any substantial change to the information handling policies and using mechanisms currently used with **PARRA GONZÁLEZ ABOGADOS SAS** during the normal course of our relationship. In case of non-substantial changes, **PARRA GONZÁLEZ ABOGADOS SAS** will publish such circumstance in its ww.parranietoabogados.com webpage.

A substantial change is any change involving the ID of the responsible party or the purpose of the personal information handling.

SIXTEEN - EFFECTIVE DATE OF THIS PERSONAL INFORMATION POLICY AND DATABASE TERM

This policy will be in effect as of October 1 of 2016. The database object of the handling associated to this policy will be in effect during the maximum time authorized by the national laws, indefinitely in case of their silence.

SEVENTEEN - CONTACT INFORMATION OF THE PERSON RESPONSIBLE FOR THE INFORMATION

Responsible person: PARRA GONZÁLEZ ABOGADOS S.A.S.

Tax identification number 900.438.181-0

Main address: Av. Carrera 15 No. 88 – 64 Of. 619

Telephone: (57 1) 7460660

Headquarters: Bogota D.C

webpage: www.parranietoabogados.com

email: gerencia@parranietoabogados.com