

Personal Data Handling Policy

2025

Business Risk Management



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Organizational Improvement and Projects Directorate

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1. Introduction

The Political Constitution of Colombia established in Article 15 the right to protection of personal data, as the right of every person to know, update, rectify and/or cancel the information and personal data collected and/or processed in public or private databases.

Through Statutory Law 1581 of 2012, the Congress of the Republic regulated the aforementioned right by establishing the General Provisions for the Protection of Personal Data in Colombia, likewise regulated by the Single Regulatory Decree 1074 of 2015 of the Commerce, Industry and Tourism Sector, Title V of the Single Circular of the Superintendence of Industry and Commerce, among others.

In compliance with the above provisions, Sociedad Administradora de Fondos de Pensiones y Cesantías Porvenir S.A. (hereinafter PORVENIR), a financial services company under the terms of Article 3 of Decree Law 663 of 1993 - Organic Statute of the Financial System -, identified with N.I.T. 800.144.331-3, proceeds to establish this document in accordance with the parameters set forth in Article 2.2.2.25.3.1 "Information Processing Policies" of the Sole Regulatory Decree 1074 of 2015 of the Commerce, Industry and Tourism Sector (regulation originally established in the repealed Article 13 of Regulatory Decree 1377 of 2013, by virtue of Article 3.1.1 of the Sole Regulatory Decree 1074 of 2015).

2. Subject Matter

Establish and communicate the guidelines that PORVENIR carries out for the processing of personal data over which it acts as Data Controller, mechanisms for the exercise of the right of habeas data, as well as the purposes, security measures, and other aspects related to the protection of personal information, in accordance with current regulations.

3. Scope

This policy applies to the personal information contained in the databases and/or files that contain personal data, and that in accordance with the regulations in force, are susceptible to processing by PORVENIR, in its capacity as Data Controller.

4. Recipients

This policy shall apply to all databases, both physical and digital, that contain personal data and that are subject to Processing within the Republic of Colombia by PORVENIR, who in this case is considered the Data Controller.

The policy is addressed to the Data Subjects over which PORVENIR has the quality of Data Controller, so that they have at their disposal the necessary and sufficient information about the different processing and purposes over which their personal data will be the object, as well as the rights that they, as owners of personal data, can exercise against PORVENIR.

5. Mandatory Nature

The provisions contained herein are of mandatory compliance by employees, interns, suppliers, contractors, and in general, any third party that treats/uses or has access to databases containing personal information on which PORVENIR acts as Data Controller.

6. Information of Porvenir as data controller for the processing of personal data

PORVENIR, as the data controller for the Processing of Personal Data contained in its Databases, proceeds to present its contact and location information, in the terms indicated in numeral 1 of Article 2.2.2.2.25.3.1 of the Sole Decree 1074 of 2015, in which the Data Subjects may submit their requests and complaints:

- Company name: Sociedad Administradora de Fondos de Pensiones y Cesantías Porvenir S.A. (PORVENIR).
- Tax ID: 800.144.331-3.
- Main domicile: Carrera 13 No. 26 A - 65 of the city of Bogotá D.C., Republic of Colombia.
- Phone: Bogotá D.C.: (601) 7447678; in Medellín: (604) 6,041,555 in Barranquilla: (605) 3855151; in Santiago de Cali: (602) 4,857,272 or rest of the country, 01 8000 510 800.
- Virtual Window: contacto.porvenir.com.co
- WEB page: www.porvenir.com.co

7. Legal framework

- **Article 15 of the Political Constitution of Colombia**

It corresponds to the highest standard of the Colombian legal system, which establishes the fundamental right to privacy of all persons. From this standard and through various rulings of the Constitutional Court, the right to habeas data began to develop nationally.

This right is currently a fundamental and autonomous right, in accordance with the rulings of the Constitutional Court, and therefore no longer needs to be invoked subsidiarily within the protection of privacy (e.g., Constitutional Court, rulings SU-082 of 1995, M.P. Jorge Arango Mejía; T-176 of 1995, M.P. Eduardo Cifuentes Muñoz; T-729 of 2002, M.P. Eduardo Montealegre Lynett; C-1011 of 2008, M.P. Jaime Córdoba Triviño, etc.).

- **Statutory Law 1581 of 2012, <Whereby general provisions are issued for the protection of personal data>**

Regulation of the Congress of the Republic, which outlines the general conditions for the regulation of the handling of personal information in Colombia. It establishes the rights that individuals have as Data Subjects of personal information and the duties of those who use and collect such personal information in databases.

Likewise, Article 19 of said law establishes the Superintendence of Industry and Commerce (hereinafter SIC) as the country's authority for the protection of personal data.

- **Constitutional Court, Ruling C-748 of 2011, M.P. Jorge Pretelt Chaljub**

Corresponds to the judicial review conducted on Statutory Law 1581 of 2012 in order to validate its constitutionality. In this case, the Court carries out an in-depth analysis of personal data and brings as support elements from previous Colombian jurisprudence and international norms on the subject. This ruling helps to understand the legal elements that regulate data protection in Colombia.

- **Sole Decree 1074 of 2015 <whereby the Sole Regulatory Decree of the Commerce, Industry and Tourism Sector is issued> (which compiled and repealed Decrees 1377 of 2013 <whereby Law 1581 of 2012 is partially regulated>) and 886 of 2014 <Whereby Article 25 of Law 1581 of 2012 is regulated, related to the National Database Registry>**

Standard of the National Government that regulates to the Statutory Law 1581 of 2012, at first the same was independently in the decrees 1377 of 2013 and 886 of 2014, but was later incorporated in the Single Decree 1074 of 2015 of the Commerce, Industry and Tourism Sector. This standard added issues that must be taken into account when guaranteeing the protection of personal data.

- **Chapter Three of Title V of the Sole Circular of the SIC <PROTECTION OF PERSONAL DATA>.**

SIC Standard, in which the personal data protection authority establishes, among others, the list of countries that have adequate levels of personal data protection and incorporates the procedure before the SIC to be carried out by the interested party, in case the country is not in the list of countries with adequate level.

8. Glossary

For the purposes of this policy, the following definitions of the law, regulations and standards in force apply, which are incorporated in this document for the didactic ease and understanding of the Data Subjects:

- **Area Responsible for Data Protection:**

This is the area within PORVENIR whose function is to monitor and control the application of the Personal Data Protection Policy and the implementation of the Comprehensive Personal Data Protection Program. This area is led by PORVENIR's Personal Data Protection Officer.

- **Comprehensive Customer Care (AIC)/Customer Experience Management:**

Area of PORVENIR whose function is the reception and attention of the petitions, complaints, claims and consultations formulated by the Personal Data Subjects through the different channels provided by PORVENIR.

- **Authorization:**

Prior, express and informed consent of the Data Subject to carry out the Processing of personal data.

PORVENIR may obtain the authorization through the means it has provided for such purpose, so that the data subject grants its prior, express and informed consent to the treatment to which its personal data are subject, preserving the evidence in physical and/or digital media.

- **Privacy Notice:**

Verbal or written communication generated by PORVENIR, addressed to the Data Subject for the processing of his/her personal data, through which he/she is informed about the existence of the Personal Data Processing Policy that will be applicable to him/her, the way to access it and the purposes of the processing that is intended to be given to the personal data.

- **Database:**

Organized set of personal data that is susceptible to processing.

- **Personal Data:**

Any information linked or that can be associated to one or several natural persons, determined or determinable.

- **Public Data:**

It is data that is not semi-private, private or sensitive. Data related to the marital status of individuals, their profession or trade and their status as merchants or public servants, among others, are considered public data. By their nature, public data may be contained, among others, in public records, public documents, official gazettes and bulletins and duly executed court rulings that are not subject to confidentiality.

- **Semi-private Data:**

Concept taken from Statutory Law 1266 of 2008, which, for the purposes of definitions, is valid in accordance with the Constitutional Court's ruling C-748 of 2011; semi-private data refers to data that is not intimate, confidential, or public in nature and whose knowledge or disclosure may be of interest not only to its owner but also to a certain sector or group of people or to society in general.

- **Sensitive Data:**

Sensitive data are understood as those that affect the privacy of the Data Subject or whose improper use may generate discrimination, such as those that reveal racial or ethnic origin, political orientation, religious or philosophical convictions, membership in trade unions, social organizations, human rights organizations or those that promote the interests of any political party or that guarantee the rights and guarantees of opposition political parties, as well as data related to health, sex life, and biometric data.

- **Biometric Data:**

Biometric data are data of a sensitive nature, which are understood in accordance with the SIC in its concept 18-171259-1 of 2018, in the following manner, by way of example but not limited to: "(...) Biometric information includes data on the physical (face, fingerprint, palm print, retina, DNA) and 'behavioral' (manner of signing, tone of voice) characteristics of individuals. The use of other, so-called second-generation biometrics, such as neural wave analysis, skin luminescence, remote iris scanning, advanced facial recognition and body odor, is beginning to be explored, with major advances in system interfaces and behavioral biometrics (...)"

- **Data Processor:**

Natural or legal person, public or private, which by itself or in association with others, performs the processing of personal data on behalf of the controller.

- **Authorized Entities:**

It refers to those companies that make up the Aval Financial Conglomerate (listed in Resolution No. 0155 of 2019 of the Superintendency of Finance) and also the entities that are part of the Grupo Empresarial Sarmiento Angulo - GESA -, the latter listed in PORVENIR's Chamber of Commerce certificate. The Data Subjects may consult who these companies are on PORVENIR's website, where they are listed for ease of reference.

PORVENIR may only deliver such Personal Data to these companies if the Data Controllers previously and expressly authorize it. PORVENIR hereby clarifies to the Data Subject that the Transfer to these Authorized Entities will be perfected by virtue of eventual agreements, contracts or agreements that PORVENIR enters into with any of said entities.

- **Data Controller:**

Natural or legal person, public or private, who alone or in association with others, decides on the database and/or the processing of data. For the purposes of this document and as previously referred to in different sections, PORVENIR shall be understood as the Data Controller.

- **Data Subject:**

Natural person whose personal data are subject to processing. It is the person who authorizes the processing of your data.

- **Transfer:**

The transfer of data takes place when PORVENIR, sends the information or personal data to a recipient, which in turn is the Data Controller, which is located within or outside the territory of the Republic of Colombia.

- **Transmission:**

Processing of personal data that involves the communication of such data within or outside the territory of the Republic of Colombia when the purpose of the processing is to be carried out by the Data Processor on behalf of PORVENIR. The Data Subjects may consult who are the Data Processors in charge of PORVENIR's web page.

- **Processing:**

Any operation or set of operations on personal data, such as collection, storage, use, circulation or deletion.

9. Guiding Principles

PORVENIR supports the processing of personal data that it manages as the Data Controller, based on the following principles established in Article 4 of the Statutory Law 1581 of 2012:

- Restricted access and circulation:** The processing may only be carried out by persons authorized by the Data Subject and/or by the persons provided for in the regulations in force. PORVENIR will not make personal data, except for public information, available on the Internet or other means of dissemination or mass communication, unless access is technically controllable to provide restricted knowledge only to the Data Subjects or authorized third parties in accordance with the law.
- Confidentiality:** PORVENIR and all persons involved in the processing of personal data have the obligation to keep and maintain the confidentiality of such information, an obligation that subsists even after the end of the contractual relationship. To this effect, PORVENIR shall implement clauses to this effect.
- Purpose:** PORVENIR will treat personal data for legitimate purposes, in accordance with the Political Constitution and the law, which will be informed to the Data Subject.
- Legality:** PORVENIR recognizes that the processing of personal data is a regulated activity, which must be subject to the provisions of current regulations.

- e. **Freedom:** PORVENIR will process the personal data by virtue of the prior, express and informed authorization of the Data Subject and/or the enabling rules that apply to it as a Pension and Severance fund management company. Personal data may not be obtained or disclosed without prior authorization, or in the absence of a legal or judicial mandate that relieves consent.
- f. **Security:** PORVENIR will adopt the technical, human and administrative measures that are necessary to provide security to the personal data bases that are administered by it, avoiding their adulteration, loss, consultation, use or unauthorized or fraudulent access. As a financial institution, PORVENIR will implement and control all information security and cybersecurity requirements.
- g. **Transparency:** PORVENIR shall guarantee the right of the Data Subject to obtain and know from PORVENIR, or from the data processor(s), at any time and without restrictions, the existence of personal data concerning him/her.
- h. **Truthfulness or quality:** PORVENIR shall ensure that the personal data collected are truthful, complete, accurate, updated, verifiable and understandable.

10. Special categories of data

10.1 PROCESSING OF PERSONALLY SENSITIVE DATA

In general terms, Article 6 of the Statutory Law 1581 of 2012 states that the Processing of Sensitive Personal Data is prohibited. Notwithstanding the foregoing, the Congress of the Republic establishes five exceptions in the same article. PORVENIR will refer in this general document to the exception established in paragraph a) of article 6 of the aforementioned law, which corresponds to cases in which the following cases are considered as exceptions: "(...) The Data Subject has given his/her explicit authorization to such Processing, except in those cases where by law the granting of such authorization is not required (...)".

In development of the above, the National Government in Article 2.2.2.2.25.2.3 of the Sole Regulatory Decree 1074 of 2015, provided as follows: "... In the Processing of sensitive personal data, when such Processing is possible in accordance with the provisions of Article 6 of Law 1581 of 2012, the following obligations must be complied with:

1. To inform the data subject that since it pertains to sensitive data, he/she is not obliged to authorize its processing.

2. Inform the data subject explicitly and in advance, in addition to the general requirements of authorization for the collection of any type of personal data, which of the data to be processed are sensitive and the purpose of the processing, as well as obtain their express consent (...)"

102 PROCESSING OF PERSONAL DATA OF CHILDREN AND ADOLESCENTS

The Processing of Personal Data of children and adolescents is prohibited, except in the case of data of a public nature and when such processing complies with the following parameters and/or requirements:

- That they respond to and respect the best interests of children and adolescents.
- To ensure respect for their fundamental rights.

Once the above requirements have been met, the legal representative of the children or adolescents will grant the authorization, after the minor has exercised his or her right to be heard, an opinion that will be assessed taking into account the maturity, autonomy and capacity to understand the matter.

11. Enabling standards

PORVENIR, as a pension and severance fund management company, is obliged to comply with a series of social security regulations, which establish that it must have the necessary information for the fulfillment of the financial service it offers.

The following is a list of some of these standards:

- Law 828 of 2003, Article 8. "REQUEST OF INFORMATION. The (...) the Pension Fund Administrators (...) may request (...) both from contributing affiliates and beneficiaries, as well as from employers, the documentation they require to verify the veracity of their contributions or the accreditation of the quality of beneficiaries, without prejudice to the reserve that by law some documents have (...)"
- Decree 656 of 1994, Article 17. "The management companies must obtain and keep updated all the pension information of the affiliates, in such a way that they are able to accurately determine the moment at which each one of them meets the requirements to access an old-age pension."

12. Double protection

PORVENIR, as a financial institution, in addition to ensuring that the personal data it manages is processed in accordance with the provisions of Statutory Law 1581 of 2012 and other regulations that complement, regulate, or modify it, has the obligation to comply with its affiliates with the provisions established by the financial activity it carries out and those issued by the Financial Superintendency of Colombia (SFC) in the course of its activities.

In view of this situation, it declares that the financial information of its affiliates is subject to the obligations and duties of the banking reserve. For the above, reference is made to the corresponding regulations:

- **Article 7, literal i., of Law 1328 of 2009:**

"The duty to keep confidential the information provided by the financial consumer and which is of a reserved nature under the terms established in the corresponding regulations, without prejudice to its provision to the competent authorities".

- Basic Legal Circular of the SFC, P1, Tit. IV, Ch. I - Special Obligations:

"(...) those supervised [by the SFC] must protect the confidential information of their clients, adopting procedures and control mechanisms that must be incorporated in the code of good governance or code of ethics of the institutions, in order to avoid leaks of the aforementioned information."

13. Processing and purposes

PORVENIR will process personal data in accordance with the following purposes that correspond to the following types of Data Subjects whose personal information is processed by PORVENIR, which are listed below:

13.1. AFFILIATES OF PORVENIR:

Essential purposes for the provision of financial services (mandatory pension, voluntary pension and severance pay) by PORVENIR:

I. Essential purposes for the provision of financial services (mandatory pension, voluntary pension and severance pay) by PORVENIR:.

- For the linking and/or transfer to the financial services of PORVENIR and contracted by me (all these as part of the main corporate purpose and its related activities). Therefore, PORVENIR will collect, incorporate and update my personal data so that they can be

incorporated for the following purposes into PORVENIR's current or future personal databases, which may be directly managed within PORVENIR's technological infrastructure or through cloud infrastructure services or other technologies that may exist.

- Access, consult, compare, monitor and report these databases to comply with legal duties of PORVENIR, or to facilitate communication with its affiliates and/or perform security validations regarding the identity of the affiliate, or when the affiliate wishes to perform operations with PORVENIR, or to have knowledge of the client (affiliate). Such steps shall be carried out with different public databases (i) such as, for example, the National Civil Registry, National Police, Comptroller's Office, Attorney General's Office, Financial Superintendence, DIAN or other entities and/or (ii) public: such as, for example, the National Registry of Civil Status, the National Police, Comptroller's Office, Attorney General's Office, Prosecutor's Office, Financial Superintendence, DIAN or other entities and/or (ii) private, such as, for example, social security and severance pay entities, ASOFONDOS, PILA information operators, credit risk centers (information operators of the Statutory Law 1266 of 2008), compensation funds, and any other that may be required for the compliance of legal obligations and information duties of PORVENIR.
- To be used as evidence.
- Transmit the information to third parties contracted to carry out the provision of PORVENIR's services in the development of its main and related corporate purpose. Such transmissions will always be subject to the fulfillment of the duties that correspond to these Third Parties as Data Processors of my personal data according to the purposes herein authorized. A list of Data Processors may be consulted on PORVENIR's web page <https://www.porvenir.com.co>
- Carry out the pertinent steps for the development of the pre-contractual, contractual and post-contractual stages.
- Send messages, notifications or alerts via telephone (through calls and/or text messages such as SMS and/or MMS), physical or electronic mail or digital media.
 - Send statements.
 - Disclose legal information, requirements and regulatory changes.
 - Security notifications for financial transactions or substantial changes to registered information.
 - Sharing financial information or financial education.
 - Responses to requests, questions, complaints and claims.
 - Investment news.
 - Inform me about innovations and changes made to my products and/or services.
 - Publicize improvements, momentum or changes in service channels.
 - Contact me to update my information; to conduct service satisfaction surveys; campaigns aimed at promoting the product and retaining customers.

I. Commercial purposes and offering of products or services:

The Data Subject may choose which of these commercial purposes he/she grants to PORVENIR as Data Controller and may also decide to extend my authorization, as Data Controller, to the Authorized Entities.

- To send promotions, information about other products and/or services, commercial, advertising, marketing, institutional campaigns, sweepstakes, events, corporate social responsibility events or other benefits. Communications may be made by telephone (through calls and/or text messages such as SMS and/or MMS) or physical or electronic mail and my digital media; and will be made within the following hours: (i) Monday through Friday from 7:00 a.m. to 7:00 p.m., and/or (ii) Saturdays from 8:00 a.m. to 7:00 p.m.
a.m. to 3:00 p.m.
- Sharing and marketing my personal data under the Open Finance regime, Decree 1297 of 2022 and regulatory rules.
- For the purposes of my right as Data Subject (affiliate) to financial portability established in the current regulations.

13.2 APPLICANTS TO BE EMPLOYEES OF PORVENIR

PORVENIR requires the hiring of personnel to provide the different activities developed by the company for the development of its corporate purpose. With this in mind, PORVENIR receives resumes, conducts psycho-technical examinations or other tests necessary to ensure the recruitment of the best talent. Therefore, the Personal Data contained in documents will be treated for the following purposes:

- Direct contact between the Data Subject (applicant to be an employee) and PORVENIR
- Evaluate their suitability according to the characteristics of the vacancy to be hired.
- Verification of the information contained in the résumé, either directly or through the selection company hired by PORVENIR, which also has personal data protection policies.
- Conducting selection tests, interviews, home visits, medical examinations and security studies, either directly or through the selection company hired by PORVENIR.
- Sending of PORVENIR's institutional information.

- Sending text messages (SMS) and e-mails.
- Retain personal data for future selection processes.

13.3. PORVENIR EMPLOYEES:

As a consequence of the above, when PORVENIR links people as collaborators/employees, it will treat their Personal Data for the following purposes:

- To enable THE EMPLOYER to comply with its obligations and exercise its rights, and in general, for the processing of all activities arising from its status as an employer and its main and related corporate purpose, applicable to former or current employees.
- Promotion of labor welfare.
- Manage and control training and education processes.
- Delivery of work elements.
- Risk prevention and health promotion in the workplace and health emergencies.
- Competency measurement and performance evaluation.
- Issuance of labor certificates and income certificates.
- For the capture of biometric data through video surveillance or recording systems, taking photos for ID cards or in the entry system, the purpose of processing this data will be to identify employees, control entry and stay in the facilities, ensure security, and prevent irregular behavior. It will also be used to perform statistical analysis on the control of people flow.
- Manage the updating of data and information.
- Send messages, notifications or alerts through physical or digital media, to disseminate information about financial education and PORVENIR University.
- To elaborate and report statistical information, reports, satisfaction surveys and studies, for which I authorize the possibility of contacting me for such purposes. This authorization for the processing of my personal data is extended to the entities that make up the Aval Financial Conglomerate listed in Resolution 0155 of 2019 issued by the Financial Superintendence of Colombia, as well as to the entities that are part of the

Sarmiento Angulo Business Group, listed in the Certificate of Existence and Legal Representation of PORVENIR issued by the Chamber of Commerce of Bogota (collectively "The Authorized Entities").

- To share your personal data with national and/or foreign authorities when the request is based on legal or procedural reasons, for the convenience of the Data Subject or to collaborate with national and/or foreign governments that require the information based on legitimate reasons such as legal or tax issues.
- To use its image on photographs and audiovisual productions or corporate videos disclosed on social networks such as Twitter® (now X Corp), Instagram®, YouTube®, Facebook®, TikTok®, LinkedIn® or others known or to be known, the institutional website of PORVENIR and even for publication in print media and / or advertising, ceding any rights on documents and images obtained for such purposes.
- So that for the purposes of the main and related corporate purpose of the Authorized Entities, statistical, commercial and risk control purposes, they may consult and/or report to the following types of information databases: (i) Personal, such as the one managed by the National Civil Registry Office regarding the civil registry. (ii.) to financial and credit institutions, such as information operators, this power entails the reporting of the birth, development, modification, extinction and fulfillment of obligations contracted or to be contracted, the existence of unpaid debts or the improper use of contracted services and (iii) in general to those public and private information files, such as the Single Registry of Affiliates (Registro Único de Afiliados -RUAF).
- To process the personal data of its beneficiaries, whether they are adults or minors, for the purpose of affiliation to the comprehensive social security system, as well as for each and every one of the benefits that are established and that are established by PORVENIR.
- For personal data to be transmitted and transferred, in cases where it is necessary on the part of the EMPLOYER, for purposes of compliance with labor welfare activities, and in general, for the fulfillment of the aforementioned labor activities.

134. SOCIAL RESPONSIBILITY AND MARKETING PROGRAMS:

PORVENIR will process for these purposes, in a generic manner, duly authorized Personal Data for the following purposes:

- Generate internal communications and publications, email marketing, branding, social networks, among others, aimed at publicizing PORVENIR's corporate social responsibility activity to be carried out upon signing the authorization.
- Use the videos and photographs in corporate publications disclosed in social networks such as social networks such as Twitter® (now X Corp), Instagram®, YouTube®, Facebook®, TikTok® or others known or to be known, PORVENIR's institutional website and even for publication in print media and / or advertising. These personal data may be processed in material format or support, in printed editions or in electronic, optical, magnetic, networks (Intranet and Internet), data messages or similar and in general for any medium or support known or to be known in the future.
- In addition to the above, to reproduce in all its forms, adapt, distribute and communicate publicly in any written, analog or digital media and/or in any platform or institutional publications, the image and personal data.

13.5. PORVENIR SUPPLIERS (NATURAL PERSONS):

PORVENIR, for the development of its corporate purpose, is empowered to enter into contracts of different nature with suppliers that guarantee the supply or delivery of goods, services, civil works, among others. By virtue of the foregoing, in the event that suppliers are natural persons, it will use the personal data provided by them for the following purposes:

- In order to serve as support for the structuring of possible commercial and/or service relationships with such entities.
- Carry out due diligence processes, verification of commercial and reputational background and possible relationship risks associated with money laundering and financing of terrorism, and exercise the right to know the supplier sufficiently.
- To assess the present or future risk of the contractual relationship, as well as to administer, manage and monitor the contractual relationship.
- Comply with operational, legal and/or safety processes, such as registration in supplier systems, updates and evaluation visits.
- The information may also be used for statistical purposes.

Note: The following pronouncements issued by the Superintendence of Industry and Commerce (SIC) must be taken into account for the personal data of employees/collaborators of PORVENIR's suppliers that are companies, which are used by PORVENIR for the development of any negotiation, contract or execution thereof:

- **SIC CONCEPT 18-216299:** "(...) the corporate data of a legal entity such as institutional emails, corporate cell phones, bank accounts, landlines and extensions, contact address, among others, escape the orbit of protection of law 1581 of 2012 and the legal representative or employees of the same, must in any case, provide the relevant data that allow commercial interaction with other subjects of law without the effect, it is necessary to grant the authorization of processing that deals with the law in mention (...).
- **SIC RESOLUTION 33267 of 2020:** "(...) of e-mail addresses as personal data and of the classification of this kind of information (...) not all information is personal data, nor that all personal data requires authorization to be processed. An e-mail address is not, per se, personal data and some e-mail addresses are personal data of a public nature. (...) Data that is not semi-private, private or sensitive. Data related to the marital status of individuals, their profession or trade and their status as merchants or public servants, among others, are considered public data. By their nature, public data may be contained, among others, in public records, public documents, official gazettes and bulletins and duly executed court rulings that are not subject to confidentiality."

13.6. ACCESS CONTROL AND VIDEO SURVEILLANCE

PORVENIR for visitors, video surveillance recordings and security of its facilities, may process Personal Data for the following purposes:

- Identify and maintain control of persons entering the facilities in order to ensure both their safety and mine.
- Perform statistical processing to control the flow of people and thus offer a better service.
- Check-in, check-out and check-in of the facilities.
- Administrative procedures.

13.7. SENSITIVE DATA:

PORVENIR may process Sensitive Data, in addition to the reference of social responsibility and marketing programs and / or video surveillance, for various purposes, some of which are presented below:

- Consult and reproduce sensitive data such as fingerprint, image or voice for the development of the corporate purpose.
- To preserve the safety of people visiting PORVENIR's facilities.
- To process the opening and/or linking of products and/or services.
- So that identity validation through biometric data can be used as a means of proof.
- So that through an entity certified as biometric operator or directly, perform the validation of the identity against the database produced and managed by the National Civil Registry ("RNEC").

In any case, it is reiterated that PORVENIR will not condition any activity to the delivery of sensitive data.

14. TEMPORARY LIMITS ON THE PROCESSING OF PERSONAL DATA

The personal data contained in PORVENIR's databases shall be determined by the purpose of such processing. In this sense, once the purpose for which the data was collected has been exhausted. PORVENIR will proceed to destroy or return them, as the case may be, or keep them under the terms established by law, adopting adequate measures to prevent inappropriate processing. All this is done in compliance with the provisions of Article 2.2.2.2.25.2.8 of the Sole Regulatory Decree 1074 of 2015.

Among the cases in which PORVENIR will keep the data even if the relationship with the individuals has been exhausted, occur, for example, in the case of documentary retention duty of the information that makes up the pension file in accordance with Agreement No. 006 of 2011 of the General Archive of the Nation, or some provisions contained in the Sole Regulatory Decree 1833 of 2016 <Sole Decree General Pension System>, among others.

15. TRANSMISSION AND TRANSFER OF PERSONAL DATA

PORVENIR may use Personal Data:

(a) Transfer (from PORVENIR as Data Controller to another Data Controller) and/or **(b)** Transmit (from PORVENIR as Data Controller to third parties with whom it has an operational relationship that provide it with the services necessary for its proper operation, or in accordance with the functions established in its charge in the regulations in force (these will be PORVENIR's Data Processors). In all the above cases, PORVENIR will only do so if it has either a previous, express and informed Authorization from the Data Subject or if the regulations generate any obligation (for example, the sending of product statements to the physical addresses of the affiliates).

In such cases, the necessary measures will be adopted so that the persons who have access to their personal data comply with this Policy and with the principles of personal data protection and obligations established in the current regulations.

All this will be done in accordance with Article 2.2.2.2.25.5.2 of the Sole Regulatory Decree 1074 of 2015, safeguarding the security of the databases in which personal data is contained and keeping confidentiality regarding the processing of the same.

PORVENIR, as data controller for the personal information stored in its Databases and in accordance with the purposes described in this policy, may carry out the transmission and/or transfer of personal data of the Data Subject, taking into consideration the following requirements:

- The transmission and/or transfer must be for the fulfillment of a legitimate purpose.
- The personal data to be transmitted or transferred is relevant and necessary and not excessive in relation to the purpose for which it is being transmitted or transferred.
- When there is prior, express and informed authorization from the Data Subject.
- When there is an administrative or judicial order to do so.
- When the third party guarantees security measures that prevent destruction, loss or unauthorized or fraudulent access.
- When there is an agreement that regulates in detail the obligations and duties in the exchange of information, or, if applicable, data protection clauses within broad contracts.

16. RIGHTS AND CONDITIONS OF LEGALITY OF THE PROCESSING OF PERSONAL DATA.

16.1. RIGHTS OF THE DATA SUBJECT

In the Processing of Personal Data by PORVENIR, the rights of the Personal Data Subjects will be respected at all times, which are:

- Access free of charge to the data provided that have been processed.
- To know, update and rectify their personal data in front of PORVENIR or its Data Processors. This right may be exercised, among others, against partial, inaccurate, incomplete, fractioned, misleading data, or data whose processing is expressly prohibited or has not been authorized.
- Request proof of the authorization granted, or any other that the Personal Data Subject subscribes for that purpose, except when expressly exempted as a requirement for the processing of data in accordance with the regulations in force.
- To be informed by PORVENIR, upon request, regarding the use that has been made of their Personal Data.
- To revoke the authorization and/or request the deletion of personal data when the treatment does not respect the principles, rights and constitutional and legal guarantees. The revocation and/or suppression will proceed when the SIC has determined that in processing PORVENIR has incurred in conducts contrary to the law and the Constitution. The revocation will proceed as long as there is no legal or contractual obligation to keep the personal data.
- To file before the SIC, as the competent authority, complaints for violations to the provisions of the law and other regulations that may modify, substitute or add to it. For such right, in any case, the Data Subject must have exhausted the consultation or claim process before PORVENIR, in accordance with Article 16 of the Statutory Law 1581 of 2012.

16.2. AUTHORIZATION OF PERSONAL DATA

Notwithstanding the exceptions provided for in the regulations in force, the Processing of Personal Data requires the prior, express and informed authorization of the Data Subject, which must be obtained by any means that may be subject to subsequent consultation. It shall be understood that the authorization complies with these requirements when it is manifested (i) in writing, (ii) orally or (iii) through unequivocal conducts of the data subject that allow the reasonable conclusion that he/she granted the authorization, such as when, for example, a resume is sent to PORVENIR to participate in selection processes or when entering the facilities knowing the existence of the privacy notices and video-surveillance systems.

16.3. PERSONS TO WHOM THE INFORMATION MAY BE PROVIDED

The exercise of the aforementioned rights and those established by law may be exercised by the following persons, in accordance with Article 13 of the Statutory Law 1581 of 2012 and Article 2.2.2.2.25.4.1 of the Sole Regulatory Decree 1074 of 2015:

- By the Data subject, who must prove his identity sufficiently by the different means made available to him by the controller.
- By their successors in title, who must prove their status as such.
- By the representative and/or attorney-in-fact of the Data Subject, upon accreditation of the representation or power of attorney.
- By stipulation in favor of or for another.
- The rights of children or adolescents shall be exercised by the persons who are empowered to represent them.

17. PROCEDURES TO ENABLE DATA SUBJECTS TO EXERCISE THEIR RIGHTS

The area responsible for answering queries or claims and, in general, any request from the Data Subject regarding the processing of his/her personal data, within the framework of the Statutory Law 1581 of 2012 and its regulatory decrees, is the Comprehensive Customer Care Area (AIC)/Customer Experience Management of PORVENIR. Within these cases, the Personal Data Protection Officer and the corresponding areas of PORVENIR may participate according to the request.

For the filing and attention of the consultation and/or claim, the Data Subject must provide the following information:

- Names and identification of the Data Subject and his/her representatives, if applicable.
- Physical and/or electronic address for notifications.
- Reason(s)/fact(s) giving rise to the claim 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).

- Documents supporting your request, if applicable.
- Have been submitted through the channels enabled by PORVENIR.

171 TIME LIMITS FOR RESPONSE TO THE RIGHT OF HABEAS DATA

Procedure for consultation: If it is a consultation by the Data Subject of the data contained in PORVENIR's database, the legitimacy of this will be verified and the consultation will be answered within a period not exceeding ten (10) working days from the day following its receipt.

In cases that cannot be attended within the stipulated time, the Data Subject will be informed before the expiration of the initial term, stating the reasons for the delay and indicating the date on which the consultation will be attended, which in no case may be more than five (5) business days after the expiration of the first term.

Claim processing: If, as a Data Subject, you consider that the information contained in a database should be corrected, updated or deleted, or when you notice the alleged breach of any of the duties contained in Law 1581 of 2012.

If the claim is incomplete, the interested party will be required to correct the information within five (5) days of receipt of the claim. After two (2) months from the date of the claim, without the interested party submitting the required information, it will be understood that the claim has been withdrawn.

The maximum term provided by law to resolve your claim is fifteen (15) business days, counted from the day following the date of receipt.

When it is not possible to handle the claim within said term, PORVENIR will inform the interested party the reasons for the delay and the date on which the claim will be attended, which in no case may exceed eight (8) working days following the expiration of the first term.

Once the terms set forth in the Statutory Law 1581 of 2012 and the other rules that regulate or complement it have been complied with, the Data Subject who is denied, totally or partially, the exercise of the rights of access, updating, rectification, suppression and revocation may bring the case to the attention of the Superintendence of Industry and Commerce - Delegation for the Protection of Personal Data.

172 PERSONAL DATA PROTECTION OFFICER

PORVENIR informs you that in order to comply with its duties of demonstrated accountability in the terms of Articles 2.2.2.25.6.1 and following of the Sole Regulatory Decree 1074 of 2015, it has welcomed the non-binding recommendations of the SIC, issued in its "Guide for the implementation of the Principle of Demonstrated Accountability (Accountability)" of 2016. By virtue of this, the Company's Board of Directors has appointed the Personal Data Protection Officer and the administration has provided him with a team of collaborators to assist him in his management, this being the Area Responsible for Personal Data Protection.

18. SECURITY AND CONFIDENTIALITY OF INFORMATION

PORVENIR has adopted the technical, technological, legal, human and administrative measures possible and necessary for the protection of the data of the data subjects, in order to guarantee the attributes of confidentiality, availability, integrity and privacy of the information, avoiding its adulteration, loss, consultation, use or unauthorized or fraudulent access.

19. SANCTIONS

IMPORTANT

Failure to comply with Statutory Law 1581 of 2012 will result in personal and institutional fines of up to the equivalent of two thousand (2,000) SMMLV.

Non-compliance with any of the numerals of this policy or Law 1581 of 2012, of the Single Decree 1074 of 2015 (compiling Decree 1377 of 2013) and other rules that modify it, is considered to represent not only a clear breach of PORVENIR's internal regulations, but also gives rise to the imposition of sanctions by the Superintendence of Industry and Commerce, indicated in Article 23 of Law 1581 of 2012, among these: fines of a personal and institutional nature.

The offense contemplated in Article 269F of the Penal Code should also be taken into account, according to which:

"PERSONAL DATA BREACH: Any person, without being authorized to do so, for his own benefit or that of a third party, obtains, compiles, subtracts, offers, sells, exchanges, sends, buys, intercepts, discloses, modifies or uses personal codes, personal data contained in files, archives, databases or similar means, shall incur a prison sentence of forty-eight (48) to ninety-six (96) months and a fine of 100 to 1,000 legal monthly minimum wages in force".

It is reiterated that the authorization signed by the Data Subject for the processing of his/her data is granted to PORVENIR as a company and not to its employees, so only PORVENIR is authorized to treat the personal data (and cannot be subtracted or used by its employees for any purpose other than the one established in the authorization given by the Data Subject).

20. NATIONAL DATA BASE REGISTRY OF THE SUPERINTENDENCE OF INDUSTRY AND COMMERCE

PORVENIR has the obligation to register and update the databases along with this policy in the National Registry of Databases (RNBD) administered by the Superintendence of Industry and Commerce in accordance with the provisions of the law. The RNBD is the public directory of databases that can be processed; it will be freely available for consultation by citizens, in accordance with the provisions of current regulations.

21. SUMMARY OF CHANGES OVER PREVIOUS VERSION

This new version No. 2 of the personal data processing policy is adjusted in attention to the fact that version No. 1 of the same was issued in the year two thousand thirteen (2013) following the guidelines established for that time in the Regulatory Decree 1377 of 2013. For the year 2023, PORVENIR seeks that the version is updated in accordance with the current regulations on the subject, as well as the best practices of proven responsibility and additionally incorporates the current purposes of the different personal data processing of the No.

13. "PROCESSING AND PURPOSES" of this document. It is also reported that the Financial Superintendency of Colombia, as the financial authority, requested Porvenir to make some updates and adjustments to its existing policy.

22. VALIDITY OF THE POLICY

The present Personal Data Processing Policy came into effect as of the twenty-seventh (27) June 2013.

The entry into force of version 3.0 of the Personal Data Processing Policy will be from the approval of this document.

23. MODIFICATIONS TO POLICY

PORVENIR, reserves the right to make modifications or updates to the Personal Data Processing Policy in consideration of changes of a legal or technical nature, and in general, when necessary to provide a better service.

In the event of substantial changes, they will be previously communicated to the Holders through the

usual means of contact and/or through the website: www.porvenir.com.co.

REGISTRY UPDATE

No.	Numeral / Title	Description of the Update	Date of Update
1.0	Entire document	Guide is created at the request of the area	July 2013
2.0	Entire document	<p>The document is modified in accordance with the following changes:</p> <ol style="list-style-type: none"> 1. The sections corresponding to Objective, Scope, Legal Framework, Principles, Definitions, Data Controller, Rights of the owners, Processing to which the data will be submitted and purposes of such processing, Security of the information, Procedures for the owners to exercise their rights, Sanctions, Validity of the policy are updated, in accordance with new guidelines. 2. In addition to the changes mentioned above, new guidelines are included according to the following reference: Obligatory nature, Enabling Standards, Period of validity of the bases, Double protection, Transmission and transfer of personal data, Modifications to the policy. 	May 2022

3.0	Entire document	<p>The document is modified according to the following changes:</p> <ol style="list-style-type: none"> 1. Chapters of Introduction (1), Recipients (4), Special categories of personal data (10), Summary of changes from previous version (21) are included. 2. Updates are made on each of the chapters of the policy, according to current legal regulations and the instructions given by the Financial Superintendency of Colombia as the financial authority. 	August 2023
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