

PERSONAL DATA PROTECTION POLICY

ZENSAR COLOMBIA SAS Version 1.

1. INTRODUCTION

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

Likewise, Law 1581 of October 17, 2012, regulated the protection of personal data, also regulated by Decrees 1377 of 2013 and 886 of 2014 which are part of the Single Decree 1074 of 2015, among others.

2. PURPOSE

The purpose of this data policy adopted by **ZENSAR COLOMBIA SAS** is to provide the necessary and sufficient information to the different stakeholders, as well as to establish the guidelines that guarantee the protection of the personal data that are subject to personal data processing in order to comply with the law, the policies and procedures for the attention of the rights of the owners and the collection criteria. Storage, use, circulation and deletion that will be given to personal data in the development of the commercial and administrative activity carried out by the company.

3. SCOPE

This policy will be applicable to all databases, both physical and digital, that contain personal data and that are subject to Processing by **ZENSAR COLOMBIA SAS**, considered as responsible. Likewise, also in those cases in which **ZENSAR COLOMBIA SAS** operates as a processor of personal data.

This policy aims to offer the owners of the information, as well as their successors or other person who has the due authorization, a fast, simple and free procedure through which they can raise their queries or complaints regarding the protection of personal data.

To comply in a comprehensive manner with the regulations on the protection of personal data, as well as any requirement arising from the principle of demonstrated responsibility (accountability).

4. RECIPIENTS

The design of this policy aims to make available to the public, customers, suppliers, employees and collaborators of the company, the necessary and sufficient information on the different treatments and purposes for which their personal information is collected, as well as the rights that they, as owners of personal data, can exercise against **ZENSAR COLOMBIA SAS** when it has the role of controller of your personal data.

This policy is mandatory for the individual or legal entities responsible for the administration of personal databases in charge of **ZENSAR COLOMBIA SAS**, especially the administrators of the company's database management and by those employees,

collaborators or contractors of the company who receive, They attend and respond directly or indirectly to requests (queries or complaints) for information related to the Personal Data Protection Law.

5. GLOSSARY

RESTRICTED ACCESS: Level of access to information limited to previously defined parameters. **ZENSAR COLOMBIA SAS** will not make Personal Data available for access through the Internet or other means of mass communication, unless technical measures are established to control access and restrict it only to Authorized persons.

AREA RESPONSIBLE FOR DATA PROTECTION: It is the area or individual or legal entity designated by the company whose function is the monitoring and control of the application of the Personal Data Protection Policy and the implementation of the Comprehensive Personal Data Protection Program.

AREA RESPONSIBLE FOR THE ATTENTION TO REQUESTS, COMPLAINTS, CLAIMS AND QUERIES: The requests, complaints, claims and queries made by the data subjects will be attended by **ZENSAR COLOMBIA SAS** through the following service channel: **dpo@zensar.com**

DATABASE: Organized set of Personal Data that are subject to processing. It includes physical and electronic files.

DATA QUALITY: The personal data submitted to processing must be truthful, complete, accurate, updated, verifiable and understandable. When you are in possession of partial, incomplete, fragmented or misleading personal data, **ZENSAR COLOMBIA SAS** will refrain from submitting it to Processing until it requests from its Owner the completeness or correction of the information.

RESTRICTED CIRCULATION: Personal data will only be processed by the personnel of **ZENSAR COLOMBIA SAS** or those who, within their functions within the organization, are in charge of carrying out such activities. Personal Data may not be delivered to those who do not have authorization or have not been authorized by **ZENSAR COLOMBIA SAS** to process them.

CONFIDENTIALITY: An element of information security that allows establishing who and under what circumstances it can be accessed.

PERSONAL DATA: Any information linked to or that can be associated with one or more specific or determinable natural persons. "*Personal data*" must therefore be understood as information related to a natural person (person considered individually).

PUBLIC DATA: It is the data that is not semi-private, private or sensitive. Public data includes, but is not limited to, data relating to the marital status of persons, their profession or trade and their status as a merchant or public servant. By their nature, public data may be contained, inter alia, in public registers, public documents, official gazettes and gazettes, and duly enforceable court judgments that are not subject to confidentiality.

SEMI-PRIVATE DATA: It is information that is not of an intimate, reserved or public 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, as is the case with financial, credit or commercial activities

SENSITIVE DATA: That data that affects the privacy of the owner or whose improper use may generate discrimination, such as those that reveal racial or ethnic origin, political orientation, religious or philosophical convictions, membership of trade unions, social or human rights organizations or 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 the health, sex life and biometric data.

RIGHTS OF CHILDREN AND ADOLESCENTS: In the treatment, respect for the prevailing rights of children and adolescents will be ensured. Only data that is of a public nature may be processed.

DATA PROCESSOR: individual or entity, public or private, that by itself or in association with others, carries out the Processing of personal data on behalf of the Data Controller.

DIGITAL INFORMATION: All information that is stored or transmitted by electronic and digital means such as e-mail or other information systems.

DATA CONTROLLER: Individual or legal entity, public or private, who, by itself or in association with others, decides on the data database and/or the processing of the data.

ZENSAR COLOMBIA SAS acts as responsible for the processing of personal data with respect to all personal data on which it directly decides, which are associated with the ordinary course of its administrative activities for the employment of personnel, information requested from suppliers and/or collaborators of the company.

Data Subject/OWNER: Natural person whose personal data are subject to Processing.

PROCESSING: It is any operation or set of operations on Personal Data carried out by **ZENSAR COLOMBIA SAS** or the Data Processors, such as collection, storage, use, circulation or deletion.

6. GUIDING PRINCIPLES

Principle of Legality in Data Processing: Processing is a regulated activity that must be subject to the provisions of Law 1581 of October 17, 2012, regulatory decrees and other provisions that develop it.

Principle of Purpose: The Processing must obey a legitimate purpose in accordance with the Constitution and the Law, which must be informed to the Owner.

Principle of Freedom: The Processing may only be exercised with the prior, express and informed consent of the ~~Data Controller~~ Data owner. Personal data may not be obtained or disclosed without prior authorization, or in the absence of a legal or judicial mandate that relieves consent.

Principle of Truthfulness or Quality: The information subject to Processing must be truthful, complete, accurate, updated, verifiable and understandable. The Processing of partial, incomplete, fractional or misleading Data is prohibited.

Principle of Transparency: In the Processing, the right of the Data Controller to obtain from the Data Controller or the Data Processor, at any time and without restrictions, information about the existence of data concerning him/her, must be guaranteed.

Principle of Access and Restricted Circulation: The Processing is subject to the limits that derive from the nature of the personal data, the provisions of the law and the

Constitution. In this sense, the Processing may only be carried out by persons authorised by the Owner and/or by the persons provided for by law. Personal data, except for public information, may not be available on the Internet or other means of dissemination or mass communication, **unless access is technically controllable to provide restricted knowledge only to the Owners or authorized third parties.**

Security Principle: The information subject to Processing by the Data Controller or Data Processor referred to by law, must be handled with the technical, human and administrative measures that are necessary to provide security to the records, preventing their adulteration, loss, consultation, use or unauthorized or fraudulent access.

Principle of Confidentiality: All employees and contractors of the company who intervene in the Processing of Personal Data that are not of a public nature, are obliged to guarantee the confidentiality of the information, even after the end of their relationship with any of the tasks included in the Processing, being able to only provide or communicate personal data when this corresponds to the development of the activities authorized by law and in the terms of the same.

ZENSAR COLOMBIA SAS undertakes to treat the personal data of the owners as defined in paragraph g) of article 3 of Law 1581 of 2012 in an absolutely confidential manner, making use of these, exclusively, for the purposes indicated in the previous section, provided that the owner has already provided the consent for such processing.

ZENSAR COLOMBIA SAS informs that it has implemented the necessary technical and organizational security measures to guarantee the security of your personal data and prevent its alteration, loss, processing and/or unauthorized access.

Principle of temporality: Personal data will be kept only for the reasonable and necessary time to comply with the purposes that justified the processing, in accordance with the provisions applicable to the matter in question and the administrative, accounting, fiscal, legal and historical aspects of the information. The data will be kept when this is necessary for compliance with a legal or contractual obligation. Once the purpose of the processing and the terms established above have been fulfilled, the data will be deleted.

Comprehensive interpretation of constitutional rights: Rights shall be interpreted in harmony and in a balanced manner with the right to information provided for in Article 20 of the Constitution and with the applicable constitutional rights.

Principle of Necessity: The personal data processed must be those strictly necessary for the fulfillment of the purposes pursued with the database

7. SPECIAL CATEGORIES OF DATA

7.1 SENSITIVE DATA

Data that affect the privacy of the Data subject or whose improper use may lead to discrimination, such as data that reveal racial or ethnic origin, political orientation, religious or philosophical convictions, membership of trade unions, social or human rights organizations or that promotes the interests of any political party or that guarantees the rights and guarantees of opposition political parties as well as data related to health, sex life and biometric data.

7.1.1 PROCESSING OF SENSITIVE DATA



ZENSAR COLOMBIA SAS will not process sensitive data, **except when:**

- a) The Data subject/Owner has given its explicit authorization to such Processing, except in cases where the granting of such authorization is not required by law.
- b) The Processing is necessary to safeguard the vital interest of the Data subject/Owner and the Data subject/Owner is physically or legally incapacitated. In these events, the legal representatives must grant their authorization.
- c) The Processing refers to data that are necessary for the recognition, exercise or defense of a right in a judicial process.
- d) The Processing has a historical, statistical or scientific purpose. In this event, measures must be adopted to suppress the identity of the Holders.

7.1.2 SPECIAL AUTHORIZATION OF SENSITIVE DATA

ZENSAR COLOMBIA SAS will inform all its owners through the various means of obtaining authorization, that by virtue of Law 1581 of 2012 and regulatory standards that they are not obliged to grant authorization for the processing of sensitive data.

In the event of processing of health-related data, **ZENSAR COLOMBIA SAS** will implement the necessary measures to protect the confidentiality of the information. The purpose of the biometric sensitive data processed is to identify people, security, comply with legal obligations and provide the IT services offered by the company.

7.1.3 RIGHTS OF CHILDREN AND ADOLESCENTS

The processing of personal data of children and adolescents is prohibited, except when it is 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.
- That their fundamental rights are respected.

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

8. PROCESSING AND PURPOSES

In accordance with the provisions of Law 1581 of 2012 and in accordance with the authorizations given by the data subject/owners of the information, **ZENSAR COLOMBIA SAS** will carry out operations or set of operations that include data collection, storage, use, circulation and/or deletion. This Data Processing will be carried out exclusively for the purposes authorized and provided for in this Policy and in the specific authorizations granted by the owner.

In the same way, Personal Data Processing will be carried out when there is a legal or contractual obligation to do so, always under the guidelines of the Information Security policies implemented by the company.



In accordance with the corporate purpose of **ZENSAR COLOMBIA SAS**, personal data will be processed in accordance with the interest group and in proportion to the purpose or purposes of each processing, as described below:

8.1. CUSTOMERS/USERS IN GENERAL

Monitor requests related to the services provided by the company

To send the answers to the queries and/or complaints submitted by the holders.

To carry out the procedures, services and other administrative procedures that are requested by the clients to guarantee the correct and efficient provision of the services offered by **ZENSAR COLOMBIA SAS**, such as the design, development, sale, commercialization of computer systems, technological solutions and software among other computer services.

Carry out campaigns and dissemination activities of the commercial services offered by the company.

Management of information by suppliers and/or contractors for procedures related to procedures and services defined in their respective relationships with the company and whenever strictly necessary.

Prepare studies, statistics, surveys, trend analysis, related to the goods and services marketed by the company

Manage the information necessary for compliance with tax, contractual, commercial obligations and commercial, corporate and accounting records.

Transmit the information to national or international managers with whom it has an operational relationship who provide the services necessary for the proper operation of the company.

To provide information services through the different means of contact.

Evaluate the quality of the services provided.

Recording of images or any other record for the purposes of security controls.

Improve promotional initiatives for the company's service provision and product updates.

Operate and improve the websites and related services offered by **ZENSAR COLOMBIA SAS**

Understand and analyze information related to the number and type of visitors who browse and use the Company's website.

Verify the user's ownership and authorization to enter the company's website.

Respond to comments, inquiries, questions, and provide customer service.

Participate in social activities, including commenting on our blog or on our social media platforms such as LinkedIn, Instagram, and Facebook

Send administrative information to you, such as information regarding the Websites and changes to our terms, conditions, and policies.



Provide information, products or services that customers request or that may be of interest to them.

Register for webinars and/or events and communicate with the client regarding such events.

Link or combine with other personal data information we obtain from third parties, to help understand your needs and provide you with better information about the websites of interest to you.

To allow the submission of job applications with **ZENSAR COLOMBIA SAS**

The other purposes that are determined in processes of obtaining Personal Data for processing, and in any case in accordance with the Law and within the framework of the commercial activities carried out by **ZENSAR COLOMBIA SAS**.

8.2. COMPANY EMPLOYEES

Carry out the activities necessary to comply with legal obligations in relation to employees and former employees of the company.

To monitor compliance with requirements related to the General Social Security System.

Publish the corporate directory for the purpose of contacting employees.

In the case of biometric data captured through video surveillance or recording systems, their processing will be for the purpose of identification, security and the prevention of internal and external fraud.

The personal data of minors will be processed in order to comply with legal obligations.

For applicants to jobs called by the company, the personal data processed will be used to advance the management of the selection processes; The resumes will be managed guaranteeing the principle of restricted access.

To inform and communicate campaigns or events related to the company's activities by the means and in the ways deemed appropriate.

Manage the company's budget chain: **(i)** company payments, **(ii)** issuance of income and withholding certificates (individual and legal entities) and **(iii)** payment relationships and **(iv)** manage the company's accounting process.

8.3. SUPPLIERS/CONTRACTORS/EXTERNAL COLLABORATORS

The personal information obtained from suppliers, contractors or collaborators of the company is limited to all purposes that arise from the object of the contracts signed with the company.

To manage internal procedures and ensure compliance with accounting, tax and legal obligations

To attend to the company's budgetary and accounting procedures, such as: **(i)** payments made by the company, **(ii)** issuance of income and withholding certificates (individual and legal entities) and **(iv)** payment list.

Manage the Accounting process of **ZENSAR COLOMBIA SAS**.



Issue the contractual certifications required by contractors or collaborators linked by **ZENSAR COLOMBIA SAS** or to respond to requests from control entities.

Maintain a digital file that allows you to have the information corresponding to each contract.

The other purposes that are determined in processes of obtaining Personal Data for processing, and in any case in accordance with the Law and within the framework of the commercial, administrative and financial activities carried out by **ZENSAR COLOMBIA SAS** in the development of its commercial purpose.

9. TRANSFER AND TRANSMISSION OF PERSONAL DATA

ZENSAR COLOMBIA SAS may transfer and transmit personal data to third parties with whom it has an operational relationship that provide it with the services necessary for its proper operation. To carry out such transfer, the company will adopt the necessary measures so that the persons who have access to the personal data submitted comply with this Policy and with the principles of protection of personal data and obligations established in Colombian Law and international regulations on the protection of personal data.

In order to carry out the transmission of personal data to one or more processors residing outside the Colombian territory, **ZENSAR COLOMBIA SAS** will establish the necessary contractual conditions or sign a contract for the transmission of personal data that will indicate at least the following aspects:

Treatment Scopes

The activities that the processor will carry out on behalf of the controller for the processing of personal data.

The obligations of the Processor towards the owner and the person in charge.

ZENSAR COLOMBIA SAS as the Data Controller, must keep proof of compliance with the provisions of this section and, when the Data Controller so requests, provide a copy thereof.

10. RIGHTS AND LEGAL CONDITIONS FOR DATA PROCESSING

10.1 RIGHTS OF THE OWNERS

The Processing of personal data carried out by **ZENSAR COLOMBIA SAS** will respect at all times and throughout the life cycle of personal information the rights of the owners of personal data, which correspond to the following:

- a)** Know, update and rectify the data in front of the Data Processor or the Data Processors.
- b)** Request proof of the authorization granted, or any other that the owner of the Personal Data subscribes for this purpose, except when expressly exempted as a requirement for the Processing of data in accordance with the law.
- c)** To be informed by the Entity or the Data Processor, upon request, regarding the use that has been given to the data.
- d)** To file complaints with the Competent Authority for violations of the provisions of the law and other regulations that modify, replace or add to it.

e) Revoke the authorization and/or request the deletion of the data when the Processing does not respect the constitutional and legal principles, rights and guarantees.

In this regard, it is specified that the revocation and/or deletion will proceed when the Competent Authority has determined that the Processing carried out by **ZENSAR COLOMBIA SAS** or Persons in Charge of the Processing of Personal Data, have incurred in conduct contrary to the law and the Constitution.

f) To access, free of charge, the Personal Data that has been subject to Processing.

10.2 AUTHORIZATION OF THE OWNER

Without prejudice to the exceptions provided for by law, the Prior and Informed Authorization of the Owner is required in the Processing, which must be obtained by any means that may be subject to subsequent consultation. The authorization will be understood to comply with these requirements when it is recorded in writing, orally or through unequivocal conduct by the holder that allows it to be reasonably concluded that the authorization was granted.

10.2.1 CASES WHERE AUTHORISATION IS NOT REQUIRED

ZENSAR COLOMBIA SAS will not require authorization from the owner of the information in the following cases:

a) Information required by public authorities in the exercise of their legal functions or when there is a court order.

b) Data of a public nature.

c) Cases of medical or health emergency, which must be previously declared by the national government

d) Processing of information authorized by law for historical, statistical or scientific purposes.

c) Data related to the Civil Registry of Persons.

10.3 PROVISION OF INFORMATION

ZENSAR COLOMBIA SAS has provided electronic means to guarantee the provision of the information required by the owners of the information. The service channels provided by the company do not have technical barriers that prevent free and simple access, and it is free and allows the user to file their request and follow up on it by assigning a case number. The information provided by the company regarding the personal data requested will be delivered in its entirety in a clear and precise manner.

10.4 DUTY TO INFORM THE OWNER

ZENSAR COLOMBIA SAS, at the time of requesting authorization from the Owner, must clearly and expressly inform the Owner of the following:

a) The processing to which your personal data will be subjected and the purpose thereof.

b) The optional nature of the answer to the questions asked, when they deal with sensitive data or the data of children and adolescents.

c) The rights that assist you as the Owner.

d) The identification, physical or electronic address and telephone number of the Data Controller.

10.5 PERSONS TO WHOM THE INFORMATION MAY BE PROVIDED

Information that meets the conditions established by law may be provided to the following persons:

- a) To the Holders, their successors or their legal representatives.
- b) To public or administrative entities in the exercise of their legal functions or by court order.
- c) To third parties authorized by the Owner or by law
- d) To third party appointed by Zensar for data processing.**

11. DUTIES OF ZENSAR COLOMBIA SAS AS THE CONTROLLER OF PERSONAL DATA

- a) To guarantee to the Owner, at all times, the full and effective exercise of the right of habeas data.
- b) Request and keep, under the conditions provided by law, a copy of the respective authorization granted by the Owner.
- c) Duly inform the Owner about the purpose of the collection and the rights that assist him by virtue of the authorization granted.
- d) Keep the information under the necessary security conditions to prevent its adulteration, loss, consultation, use or unauthorized or fraudulent access.
- e) Ensure that the information provided to the Data Processor is truthful, complete, accurate, up-to-date, verifiable and understandable.
- f) Update the information, communicating in a timely manner to the Data Processor, all the news regarding the data that has previously been provided to them and adopt the other necessary measures to ensure that the information provided to them is kept up to date.
- g) Rectify the information when it is incorrect and communicate the pertinent information to the Data Processor.
- h) Provide the Data Processor, as the case may be, only data whose Processing is previously authorized in accordance with the provisions of the law.
- i) To require the Data Processor at all times to respect the security and privacy conditions of the Data Controller's information.
- j) To process the queries and claims formulated in the terms indicated in the law.
- k) Adopt specific procedures to ensure adequate compliance with the law and, in particular, for the attention of queries and complaints.
- l) Inform the Data Processor when certain information is under discussion by the Data Controller, once the complaint has been filed and the respective procedure has not been completed.
- m) Inform at the request of the Owner about the use of his/her data.

n) Inform the data protection authority when there are violations of security codes and there are risks in the management of the Data Subjects' information.

11.1 DUTIES OF ZENSAR COLOMBIA SAS AS A PROCESSOR OF PERSONAL DATA

a) To guarantee to the Owner, at all times, the full and effective exercise of the right of habeas data.

b) Keep the information under the necessary security conditions to prevent its adulteration, loss, consultation, use or unauthorized or fraudulent access.

c) Carry out the timely updating, rectification or deletion of the data in the terms of Law 1581 of 2012 and other concordant and current regulations.

d) Update the information reported by the Data Controllers within five (5) business days from its receipt.

e) To process the queries and claims made by the Holders in the terms indicated in this policy.

f) Adopt an internal manual of policies and procedures to ensure adequate compliance with the law and, in particular, for the attention of queries and complaints by the Data Controllers.

g) Register in the databases the legend "*claim in process*" in the form regulated by law.

h) Insert in the database the legend "*information under judicial discussion*" once notified by the competent authority about judicial proceedings related to the quality of personal data.

i) Refrain from circulating information that is being disputed by the Owner and whose blocking has been ordered by the Superintendence of Industry and Commerce.

j) Allow access to information only to people who can have access to it.

k) Inform the Superintendence of Industry and Commerce when there are violations of security codes and there are risks in the management of the information of the Holders.

l) Comply with the instructions and requirements issued by the Superintendence of Industry and Commerce (SIC).

m) Verify that the Data Controller has the authorization for the processing of the Owner's personal data

12. INFORMATION STORAGE

ZENSAR COLOMBIA SAS guarantees that the storage of digital and physical information is carried out through technical and technological solutions that have adequate controls for data protection. This involves physical and computer security, technological and environmental controls in restricted areas, in own facilities and/or computer centers or document/data centers managed by third parties.

13. INFORMATION DESTRUCTION

At the end of the life cycle of the personal information, the destruction of this information if necessary, and only in cases in which it does not constitute a disregard of any legal or contractual rule, always leaving the respective traceability of the action will be carried out through mechanisms that do not allow its reconstruction

14. PROCEDURE FOR MANAGING INCIDENTS WITH PERSONAL DATA

In compliance with national and international regulations on the protection of personal data, **ZENSAR COLOMBIA SAS** implements the following procedure for managing incidents with personal data, as part of the development of actions aimed at guaranteeing demonstrated responsibility in terms of personal protection.

This procedure aims to establish the protocol defined by the company to deal with any incident or anomaly that could affect the security of the databases or physical or digital information contained therein.

I. In case of learning of any incident that has occurred, the collaborator and/or user of the services offered must report it to the area or individual or legal entity designated by **ZENSAR COLOMBIA SAS**, which will adopt the appropriate measures in the face of the reported incident.

II. If the company considers that the incident may affect or have affected databases with personal information, it will inform the area or the individual or legal entity designated by the company to manage the corresponding report in the National Registry of Databases administered by the Superintendence of Industry and Commerce.

III. Employees, contractors, suppliers and other collaborators linked to **ZENSAR COLOMBIA SAS** have the duty to report the occurrence of any suspicious event, weakness or violation of policies that may affect the confidentiality, integrity and availability of the company's assets and personal information.

IV. If suspicious or abnormal circumstances or events are identified, which allow it to be considered that the reduction or loss of reserve or confidentiality of information is occurring within the organization, an internal evaluation process must be initiated in order to establish whether there is a security incident and consequently whether or not it should be carried out. Inform senior management.

Any decision involving the investigative and judicial authorities must be made jointly between the area or the individual or legal entity designated by the company to ensure compliance with the regulation on personal data protection and the Legal Advisory Office or the external Legal Advisor, as the case may be. Communication with these authorities will be carried out by them

V. All suspicious incidents and events should be reported as soon as possible through the internal channels established by **THE SUPERINTENDENCE OF INDUSTRY AND COMMERCE**.

If sensitive or confidential information is lost, disclosed to unauthorized personnel or any of these events is suspected, the individual or legal entity designated by the company to ensure compliance with the regulation on the protection of personal data, must be notified immediately.

The company's employees, contractors or collaborators must report to their direct supervisor and to the individual or legal entity designated by the company to ensure compliance with the regulation on the protection of personal data any damage or loss of computers or any other device, when they contain personal data in the possession of the company.



No employee, contractor or collaborator of **ZENSAR COLOMBIA SAS** is authorized to disclose information about computer systems and networks that have been affected by a computer crime or system abuse, unless there is a duly reasoned and justified request from the competent authority.

This procedure is integrated into the corporate protocols and procedures established by **ZENSAR COLOMBIA SAS** at a global level in terms of information security policy and in particular the information contained in the **Zensar Privacy Notice document**

VI. PROCEDURE FOR THE PROVISION OF INFORMATION BY ORDER OF JUDICIAL OR ADMINISTRATIVE AUTHORITY

For the delivery of information or data by virtue of an order of authority, it is necessary to have the intervention of the Legal Advisory Office or External Legal Advisor in order to provide appropriate advice.

The individual or legal entity designated by the company to ensure compliance with the regulation on the protection of personal data must guarantee that actions are taken to investigate and diagnose the causes that generated the incident, as well as guarantee that the entire incident management process is duly documented, supported by the Office of Technology and Informatics.

VII. PROCESS TO MANAGE ALLEGED COMPUTER CRIMES

In the event that a computer crime is identified, under the terms established in Law 1273 of 2009, the individual or legal entity designated by the company to ensure compliance with the regulation on the protection of personal data and the Legal Advisory Office or External Legal Advisor, will report such information to the competent authorities.

During the investigation processes, the "Chain of Custody" must be guaranteed in case it is required for the initiation of a judicial and/or administrative investigation.

VIII. ACTIONS TO CONTAIN AND PREVENT FUTURE INCIDENTS

The company's Technology and IT Office, as well as any compromised area and those directly responsible for the management of personal data, must prevent the security incident from occurring again, correcting all existing vulnerabilities.

The Office of Technology and Informatics, in coordination with the individual or legal entity designated by the company to ensure compliance with the regulation on the protection of personal data and the areas that use or require the information, will initiate and document all the tasks of reviewing the actions that were executed to remedy the security incident.

The individual or legal entity designated by the company to ensure compliance with the regulation on the protection of personal data will prepare an annual analysis of the reported incidents.

The findings of this report will be used in the development of awareness campaigns that help minimize the likelihood of future incidents

IX. REPORT OF INCIDENTS TO THE SUPERINTENDENCE OF INDUSTRY AND COMMERCE



Security incidents affecting the database will be reported as news, which will be reported by the company to the control authority, in accordance with the following rules:

- a) For the violation of security codes.
- b) For the loss, theft and/or unauthorized access of information from a database managed by the Data Controller or its Processor.

Incidents must be reported to the National Registry of Databases (RNDB) within fifteen (15) working days following the time they are detected and brought to the attention of the person or area in charge of dealing with them. Process leaders and/or owners of information assets will internally report incidents associated with personal data to the individual or legal entity designated by the company to ensure compliance with the regulation on personal data protection, who will report them to the National Registry of Databases within the legal period

15. PROCEDURE FOR THE ATTENTION OF PETITIONS, QUERIES AND COMPLAINTS

Requests, queries and claims made by the owners of Personal Data under Processing by **ZENSAR COLOMBIA SAS** to exercise their rights to know, update, rectify and delete data, or revoke authorization must be addressed to the following e-mail address: dpo@zensar.com

15.1. PROCEDURE FOR THE MANAGEMENT OF CONSULTATIONS

ZENSAR COLOMBIA SAS, in its capacity as data processor, guarantees the owners of personal data contained in its databases or their successors or authorized persons, the constitutional and legal right to consult all the information contained in their individual record or all that is linked to their identification under the terms established in this Personal Data Processing Policy

The individual or legal entity designated by **ZENSAR COLOMBIA SAS** to ensure compliance with the regulation on the protection of personal data will be responsible for receiving and processing the requests submitted, under the terms, deadlines and conditions established in Law 1581 of 2012 and in these policies.

Inquiries addressed to **ZENSAR COLOMBIA SAS** must contain at least the following information:

- a. Names and surnames of the Owner and/or his/her representative and/or successors;
- b. What is intended to be consulted
- c. Physical and electronic address and contact telephone number of the Owner and/or his/her successors or representatives, signature and identification of the applicant.
- d. Have been submitted by the digital or physical means of consultation enabled by **ZENSAR COLOMBIA SAS**, that is, to the email address dpo@zensar.com

Once the request for CONSULTATION of information is received by the Data Owner or his/her representative or duly authorized third party, through the channels provided by **ZENSAR COLOMBIA SAS**, it will be transferred to the responsible area, which will proceed to verify that the request COMPLIES with the minimum information set forth in the section indicated above.

RESPONSE TIME TO QUERIES

Requests received through the service channels provided by **ZENSAR COLOMBIA SAS** will be attended to within a maximum term of ten (10) business days from the date of receipt, in accordance with the provisions of the Personal Data Protection Law.

EXTENSION FOR THE ATTENTION OF QUERIES

In the event of situations that do not allow the query to be addressed within said term, **ZENSAR COLOMBIA SAS** will inform the interested party before the expiration of the ten (10) days, expressing the reasons for the delay and indicating the date on which the query will be addressed, which in no case may exceed five (5) business days following the expiration of the first term.

15.2 PROCEDURE FOR THE MANAGEMENT OF COMPLAINTS

Through this procedure, **ZENSAR COLOMBIA SAS** guarantees the owners of the information and/or their successors or authorized persons to exercise the right to claim in relation to the following aspects:

- **Correction or Update:** **ZENSAR COLOMBIA SAS** and/or the company's data processor, will guarantee the owners of personal data contained in their databases or their successors, the right to correct or update the personal data that resides in their databases, by filing a complaint, when the parameters established by law or those indicated in this Privacy Policy are complied with. Processing of Personal Data for its origin
- **Revocation of authorization or Deletion of Personal Data:** **ZENSAR COLOMBIA SAS** and/or the company's data processor, will guarantee the owners of personal data contained in their databases or their successors, the right to Request the Revocation of authorization or request the deletion of the information contained in their individual record or all that is linked to their identification when they consider that the parameters established by law or those indicated in this Personal Data Processing Policy are met.

Likewise, the right to file claims is guaranteed when they notice the alleged non-compliance with Law 1581 of 2012 or this Personal Data Processing Policy.

RESPONSIBLE FOR ATTENTION TO COMPLAINTS:

The individual or legal entity designated by **ZENSAR COLOMBIA SAS** to ensure compliance with the regulations on the protection of personal data, will be responsible for receiving and processing the requests submitted, in the terms, deadlines and conditions established in Law 1581 of 2012 and in these policies. The complaints submitted must contain at least the following information:

- a. Names and surnames of the Owner and/or his/her representative and/or successors;
- b. What does the complaint consist of (correction, updating, revocation of authorization or deletion of personal data)
- c. Physical and electronic address and contact telephone number of the Owner and/or his/her successors or representatives, signature and identification of the applicant.



d. Have been submitted by the digital or physical means of consultation enabled by **ZENSAR COLOMBIA SAS**, that is, to the email address dpo@zensar.com

Upon receipt of the request for UPDATE or RECTIFICATION of information by the Data Subject or his/her representative or duly authorized third party, through the channels established by **ZENSAR COLOMBIA SAS**, it shall be forwarded to the individual or legal entity designated by the Owner of the Data Subject. who will proceed to verify that the application COMPLIES with the minimum information set forth in the section indicated above.

CLAIMS NOT COMPLYING WITH LEGAL REQUIREMENTS

In the event that the claim is filed without complying with the above legal requirements, the claimant will be requested within five (5) days following receipt of the claim, to correct the defects and submit the missing information or documents.

Withdrawal of the Claim:

If two (2) months have elapsed since the date of the request without the applicant submitting the required information, it will be understood that the claim has been withdrawn.

RECEIPT OF CLAIMS THAT DO NOT CORRESPOND TO THE COMPANY

In the event that **ZENSAR COLOMBIA SAS** receives a complaint addressed to another organization, it will notify the appropriate party within a maximum period of two (2) business days and will inform the claimant of the situation.

INCLUSION OF LEGEND IN THE DATABASE

Once the claim has been received in its entirety, within a maximum period of two (2) business days from receipt, **ZENSAR COLOMBIA SAS** will include in the database where the Owner's personal data is located, a legend that says "**claim in process**" and the reason for it.

This legend must be maintained until the claim is decided.

DEADLINES FOR RESPONDING TO COMPLAINTS

The maximum term for dealing with the claim will be fifteen (15) business days from the day following the date of receipt.

EXTENSION OF THE RESPONSE DEADLINE

When it is not possible to address the claim within said term, the interested party will be informed of the reasons for the delay and the date on which their claim will be addressed, which in no case may exceed eight (8) business days following the expiration of the first term.

PROCEDURE FOR DELETION OF PERSONAL DATA

In the event that the deletion of the personal data of the owner of the database is appropriate in accordance with the claim presented, **ZENSAR COLOMBIA SAS**, will proceed to operationally carry out the deletion in such a way that the deletion does not allow the

recovery of the information, however, the Owner must take into account that in some cases certain information must remain in historical records in compliance with the legal duties of the organization that their suppression will deal with the active treatment of the same and in accordance with the request of the owner.

16. ACCESS CONTROL AND VIDEO SURVEILLANCE

Areas where processes related to confidential or restricted information are carried out must have access controls that only allow authorized collaborators to enter and that allow the traceability of entries and exits to be maintained.

17. VIDEO SURVEILLANCE

ZENSAR COLOMBIA SAS has video surveillance cameras that are intended to comply with physical security policies, complying with the parameters established in the Guide for the Protection of Personal Data in Video Surveillance Systems, issued by the Superintendence of Industry and Commerce as the control authority. The images must be kept for a maximum time of 90 days. In the event that the respective image is the object or support of a claim, complaint, or any judicial process, until the moment it is resolved.

18. TRAINING OF EMPLOYEES, CONTRACTORS OR COLLABORATORS

ZENSAR COLOMBIA SAS will develop annual training and awareness programs in Personal Data Protection and Information Security.

ZENSAR COLOMBIA SAS undertakes to make these policies known by the means it deems appropriate and thereby train its employees, contractors or collaborators in the management of personal data at least annually, in order to measure their knowledge in this regard.

New employees, contractors or collaborators, when joining the company, must receive training on Personal Data Protection and Information Security, stating their attendance and knowledge.

From the Human Talent Management process, together with the individual or legal entity designated by the company to ensure compliance with the regulations on personal data protection, the training and evaluation plans for employees will be defined in accordance with the regulatory changes that are presented.

19. DEVELOPMENT AND REVIEW OF CONTROL AUDITS IN THE DEVELOPMENT OF ACTIONS OF DEMONSTRATED RESPONSIBILITY IN THE FIELD OF PERSONAL DATA PROTECTION

ZENSAR COLOMBIA SAS will carry out review processes or audits in terms of personal data protection, verifying, directly or through third parties, that the policies and procedures have been properly implemented in the company.

Based on the results obtained, the necessary improvement plans (preventive, corrective and improvement) will be designed and implemented.

ZENSAR COLOMBIA SAS will carry out these review processes at least every year or extraordinarily in the event of serious incidents that affect the integrity of the personal databases.



The results of the review, together with any improvement plans, will be submitted by the individual or legal entity designated by the company to ensure compliance with the regulations on the protection of personal data to the company's senior management for assessment and approval.

20. VALIDITY OF THE DATABASES

The Databases of **ZENSAR COLOMBIA SAS** will have the period of validity that corresponds to the purpose for which their treatment was authorized and the special rules that regulate the matter, as well as those rules that establish the commercial exercise of the commercial activities carried out by the company, which includes its different lines of business.

21. NATIONAL DATABASE REGISTRY

In strict compliance with the provisions of Article 25 of Law 1581 and its regulatory decrees, **ZENSAR COLOMBIA SAS** and in case of being subject to such obligation, will register its databases together with this Personal Data processing policy, in the National Registry of databases administered by the Superintendence of Industry and Commerce, in accordance with the procedure established for this purpose.

22. VALIDITY

This personal data processing policy is in force from the moment it is signed and complements the associated policies, with indefinite validity.

Any substantial change in the policies of Processing of personal data will be communicated in a timely manner to the owners through the website: [Zensar Colombia S.A.S. Company Profile - Colombia | Finance & Key Executives | EMIS](#)