

INEXMODA'S PERSONAL DATA TREATMENT POLICY

1. OBJECT:

Establish the criteria for the collection, storage, use, circulation and suppression of personal data treated by the INEXMODA FOUNDATION, identified with NIT 800.028.458-3 in the development of its commercial activities, in order to guarantee the rights of habeas data of the respective holders of personal data, which was recognized by the Political Constitution of Colombia in its article 15, whose protection was regulated by the 1581 law of 2012 and the unique Decree 1074 of 2015.

The Treatment Policy aims to protect the constitutional right of Habeas Data that all people have to know, update, and rectify the information that has been collected and stored by INEXMODA, as well as the other rights, liberties and constitutional guarantees to those referred to in articles 15 and 20 of the National Constitution of Colombia.

2. TREATMENT OF PERSONAL DATA:

INEXMODA, subject to the constitutional and legal provisions, will be ruled in its role as responsible for the treatment of personal data by the guiding principles that the Colombian legal system has provided in this matter, these are, according to article 4 of law 1581 of 2012:

-LEGALITY PRINCIPLE IN DATA PROCESSING: INEXMODA will administer its databases for which it is responsible with full subjection to the constitutional and legal postulates that regulate the matter.

-PRINCIPLE OF PURPOSE: The purpose for which personal data is managed and processed will be completely in accordance with the law; they will be legitimately used for the development of the commercial, operational and / or administrative activities of the company.

-PRINCIPLE OF FREEDOM: INEXMODA will only treat those data of which it has consent or those that without the consent, the law enables them for its treatment.

-VERACITY OR QUALITY PRINCIPLE: The storage and treatment of truthful, current and exact information will be constantly watched over; Likewise, permanent measures will be implemented that tend to update the data that is stored, trying not to process partial, incomplete, fractional or misleading data, which is expressly prohibited by the Colombian law.

-TRANSPARENCY PRINCIPLE: INEXMODA will have a communication mechanism where the holders of the data may come at any time with the aim of obtaining information about the personal data that is

being processed by this company and exercising the rights that assist it, according to article 15 of the Political Constitution of Colombia (Right to Habeas Data).

-PRINCIPLE OF ACCESS AND RESTRICTED CIRCULATION: Control and restriction of stored data is guaranteed, especially those data that by their nature, require special treatment (sensitive data, of children and adolescents.), so that only those with the proper authorization will be accessible.

-SECURITY PRINCIPLE: The necessary and appropriate measures will be taken for the protection of the stored data not only by INEXMODA as the person responsible for data processing, but also by any person in charge of data treatment.

-PRINCIPLE OF CONFIDENTIALITY: INEXMODA will guarantee the confidentiality of the stored information and will supply or communicate it, only when it corresponds to the development of activities authorized by law.

To this extent, INEXMODA will only process the data stored for the exercise and development of activities pertaining to its corporate purpose and the administrative development of the foundation, as well as the purpose pursued by its website, events, workshops and training, especially for the purposes of perform statistical analysis of the behavior of the data holders to make reports and recommendations to their CUSTOMERS, to corroborate the references and reputation of the person who is linked, to carry out analytical processes of customer behavior in order to define consumption habits; have a record of active and inactive customers; contacting clients or future clients through different channels (email, physical mail, through call center, etc.) for advertising, statistical or sales purposes; receive, attend and resolve the requests, complaints, claims and / or suggestions presented by clients or future clients. For which, eventually and only for the purposes described, Inexmoda may share the information with allied companies, in addition to those companies that will act as data processors and that will treat the inexmoda databases under the parameters that the law imposes.

3. RIGHTS THAT ASSIST THE DATA HOLDERS:

In full development of the provisions of article 15 of the Political Constitution of Colombia and its regulatory norms, the holder of the personal data has the following Rights:

Right to know: The owner of the data is assisted by the Right to know what personal data is held by those responsible and / or in charge of data treatment.

Right to update: The owner of the data is assisted by the Right to permanently update the data that is processed by the person responsible and / or in charge of data treatment, in order that they are adjusted to reality and allow optimal quality of information.

Right to rectify: The owner of the data is assisted by the Right to rectify the personal data that the person responsible and / or in charge of the treatment are trying to find wrong.

Right to delete: The owner of the data is assisted by the right to unsubscribe from the databases processed by the person responsible and / or in charge of the data at the time he/she/it so wishes.

Right to revoke the authorization: The holder of the personal data has the right to revoke the authorization that was initially granted for the data processing by the controller. This revocation can be total or partial depending on the owner, if such situation is reported in a timely manner.

The owner of the personal data will have the power to decide whether or not to answer the questions that are asked when they are about sensitive data or about data on girls, boys and teenagers, as provided in literal "b" of article 12 of law 1581.

4. DUTIES OF INEXMODA.

INEXMODA recognizes the ownership of personal data and therefore will use personal data for the fulfillment of the purposes expressly authorized by the owner or by current regulations. In the treatment and protection of personal data, INEXMODA will have the following duties, without prejudice to others provided for in the provisions that regulate or come to regulate this matter:

- a. Guarantee the holder, at all times, the full and effective exercise of the right of habeas data.
- b. Request and keep a copy of the respective authorization granted by the owner for the treatment of personal data.
- c. Properly inform the owner about the purpose of the collection and the rights that assist him/she/it under 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. Guarantee that the information is truthful, complete, exact, updated, verifiable and understandable.
- f. Update the information in a timely manner, attending to all the news regarding the owner's data. Additionally, all necessary measures must be implemented so that the information is kept up to date.
- g. Rectify the information when it is incorrect and communicate the pertinent.
- h. Respect the security and privacy conditions of the owner's information.
- i. Process inquiries and claims formulated in the terms indicated by law.

- j. Inform at the request of the owner about the use given to their data.
- k. Comply with the requirements and instructions issued by the Superintendency of Industry and Commerce on the subject in particular.
- l. Ensure the appropriate use of the personal data of children and adolescents, in those cases in which the processing of their data is authorized.
- m. Allow access to information only to people who can access it.
- n. Use the personal data of the owner only for those purposes for which it is duly empowered and in any case, fulfilling current regulations on the protection of personal data.

5. MANDATORY:

This policy is mandatory and requires strict compliance by all people related to INEXMODA, whether they are users of the website, both anonymous and with personal account, marketers, employees, contractors or third parties working on behalf of INEXMODA. Failure to comply with them will lead to labor-type sanctions or contractual liability depending on the case. The foregoing, without prejudice to the duty to respond patrimonially for the damages caused to the holders of the data or to INEXMODA for the breach of these policies or the improper treatment of personal data.

6. SCOPE:

This policy applies to all personal information registered in the databases from the INEXMODA website, www.inexmoda.org.co, who acts as the responsible for the treatment of personal data.

7. RESPONSIBLE FOR THE TREATMENT:

The person in charge of the treatment of the data established here, will be FUNDACIÓN INEXMODA, a non-profit entity identified with the NIT 800.028.458-3, with main address at Carrera 43 No 9 sur 195 Torre Inexmoda Piso 15, in the city of Medellin, Antioquia, Republic of Colombia. Page www.inexmoda.org.co, telephone 6043700 in the city of Medellin.

8. DEFINITIONS:

Database: Organized set of personal data that is subject to treatment and can be physical or electronic.

Anonymous user: The person who makes use of the INEXMODA website without registering, which allows him to access its free content.

Registered user: The person, of legal age, who makes use of the INEXMODA website through a personal account.

Client: The natural or legal person with whom INEXMODA has a contractual relationship or commercial alliance for the development of its corporate purpose.

Personal Data: This is any information that is linked or that can be associated with a specific person, such as their name or identification number, or that can make it determinable, such as their physical features.

Public Data: It is one of the existing types of personal data. Public data is considered, among others, related to the civil status of people, their profession or trade and their status as a merchant or public servant. By their nature, public data may be contained, among others, in public records, public documents, gazettes and official gazettes and duly executed judicial decisions that are not subject to reservation.

Private data: It is that personal data, that due to its intimate or reserved character is relevant to the Owner.

Semi-Private Data: It is that personal data known and of interest to both the owner and a certain sector of people or to society in general, so it is not intimate, reserved or public.

Sensitive Data: They are those that affect the privacy of the owner or may give rise to discrimination, that is, those who reveal their racial or ethnic origin, their political orientation, religious or philosophical convictions, membership of unions, social organizations, of human rights, as well as data related to health, sexual life, and biometric data, among others.

Personal data holder: Natural person whose data is processed. In the context of this personal data treatment policy, the holders may be: (a) Anonymous users; (ii) Registered Users; (iii) Clients (iv) all those people not related to INEXMODA from whom personal data is processed.

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

Transfer: This is the operation carried out by the person responsible or the person in charge of the treatment of personal data, when he sends the information to another recipient, who, in return, becomes responsible for the treatment of that data.

9. WAY OF COLLECTING DATA:

Way of collecting personal data of users:

The collection of personal data from anonymous and registered USERS of INEXMODA will be carried out in the following ways:

- Through the automatic storage of the data of the users who access the INEXMODA platform through the use of cookies.
- By exchanging emails.
- By accessing the INEXMODA website as an Anonymous User without a registered account.
- Accessing the INEXMODA website as a Registered User by creating a user, upon payment, which will have a password as the method of authentication, and in which you can enter your personal data.
- Through purchases, qualifications, comments and gifts that you make on the INEXMODA website.
- Through the purchase of ticket office and attendance at virtual events carried out by INEXMODA.

The collection of CLIENT personal data will be carried out in the following ways:

- By exchanging emails.
- By accessing the INEXMODA website as a CLIENT.
- Through the publications you make as a CLIENT on the INEXMODA website.
- Through the contract signed with INEXMODA for the use of its website or its participation in events of said foundation as a CLIENT.

10. PURPOSE OF THE TREATMENT:

10.1. TREATMENT TO WHICH PERSONAL DATA WILL BE SUBMITTED

The personal data of clients, suppliers, contractors, employees, ex-employees, that are stored, used, circulated, transferred, or that are in our databases from now on will be treated with the following purposes:

10.2. REGISTERED USERS: INEXMODA will use the information provided to:

1. Store, organize, classify and catalog the personal data entered by THE USER within INEXMODA's systems, files and databases.

2. Creation of an ENROLLED USER profile, as well as their respective password to identify themselves, allowing them to enter the INEXMODA platform.
3. Transmit personal data to external platforms or web pages so that they can authenticate or create a USER profile, as well as assign their respective password, when this is necessary for THE USER to attend or participate in virtual events carried out by INEXMODA .
4. Manage procedures (requests, requests, complaints, claims), carry out risk analysis, carry out satisfaction surveys regarding the services of the company, as well as of its commercial allies;
5. Carry out technical support, maintenance, development, improvement and surveillance of the USER's account on the INEXMODA website.
6. Provide contact information and relevant documents to the commercial force and / or distribution network, telemarketing, market research and any third party with which the company has a contractual link of any kind.
7. Give necessary and sufficient information to THE USER about the events, training, workshops and the like carried out by INEXMODA and by third parties, which allow them to register and access them.
8. Make known, transfer and / or transmit the personal data of the holders within and outside the country, to third parties as a result of a contract, law or lawful link that requires it, for the presentation of the respective services or under agreements or commercial alliances.
9. Provide the information to third parties with which INEXMODA has a contractual relationship and that it is necessary to provide it for the fulfillment of the contracted object.
10. Send information such as news, promotions, newsletters and advertising about INEXMODA or its allies with whom it has a signed contract, through text messages, emails, offers published on the platform and push notifications.
11. Carry out market strategies by studying user behavior regarding offers and thereby improving their content, personalizing presentation and service.
12. Carry out studies of the USER's behavior regarding offers, purchases and activity on the INEXMODA website and based on this, present reports and statistical analyzes for both INEXMODA and its allies with whom it has a signed contract.
13. Conduct studies of user behavior regarding offers and purchases, and activity on the INEXMODA website based on this, make improvements and changes to the website, as well as marketing strategies and the organization of events, training, workshops and the like carried out by INEXMODA, its allies or with whom it has a contractual relationship.
14. Preparation of commercial prospecting and market segmentation.
15. Perform through any means directly or through third parties, programming and provision of technical service, sale, purchase, billing, portfolio management, monitoring of product performance, collection, business intelligence, marketing activities, promotion or Advertising, service improvement, collection monitoring, verification, consultation and control, payment methods authorization as well as any other related to current and future products and services of INEXMODA or its allies, for the fulfillment of contractual obligations and the social object of the company.
16. Present reports to the inspection, surveillance and control authorities, and process the requests made by administrative or judicial entities.
17. Transfer or transmission of data nationally or internationally to providers with whom INEXMODA carries out activities in compliance with its corporate purpose. Likewise, transfers may be made to the



strategic allies of the company to carry out marketing, advertising, data analysis and promotions activities associated with the corporate purpose; all in accordance with the provisions of Colombian regulations.

18. Purchase and sale to third parties, both nationally and internationally, of the data or databases collected and stored by INEXMODA.

19. Control and prevent fraud in any of its forms.

10.3. CLIENTS: INEXMODA will use the information that the user provides, to:

1. Carry out analysis, evaluations and selection of potential suppliers and / or CUSTOMERS. Communication of our policies and procedures for linking suppliers.

2. Carry out the pertinent steps to guarantee compliance with any OFFER contract concluded between INEXMODA and THE CLIENT.

3. Analysis of information on quality and service levels provided by CLIENTS.

4. Legal compliance in tax, customs and commercial matters with administrative and judicial entities.

5. Initiate business agreements to acquire goods or services.

6. Control and payments for the goods and services received. Monitoring, control and accounting record of the obligations contracted with suppliers.

7. Consultations, audits and reviews derived from contracts with CLIENTS.

8. Control and prevent fraud in any of its forms.

10.4 EMPLOYEES, FORMER EMPLOYEES AND ASPIRANTS FOR LABOR VACANCIES:

The information collected is used to carry out a process of analysis, evaluation and selection of the personnel to work in the company. In specific cases, family data will be required, for procedures before compensation funds and affiliations to the general health system. The data collected from employees is intended to develop existing employment relationships with them; among them, to make them participants in the activities offered within INEXMODA. In particular, the purposes will be:

1. Evaluate the conditions of employability, sufficiency and relevance for a certain position.

2. Carry out safety studies (home visits, entry and exit medical examinations, referrals and others).

3. Comply with the obligations contracted by the company with the employees holding the information, in relation to payment of wages, social benefits and others enshrined in the employment contract.

4. Inform the modifications that are presented in development of the employment contract.
5. Evaluate the quality of the services offered by the employee.
6. Carry out internal studies on the habits of the employee holding the information for corporate wellness programs.

By virtue of the foregoing, the employee authorizes INEXMODA to process the personal data that is provided in the course of the employment relationship, during the entire period of permanence in the entity and after the relationship ends as long as there is a duty of legal or contractual conservation by IENXMODA. The authorization for the treatment of personal data is granted by the employee within what is described in this Personal Data Protection Policy, which is known and complies with the provisions of law 1581 of 2012. Some of these tasks are carried out in fulfillment of a legal and contractual duty and therefore the treatment of personal data is understood included in them. For people who are not selected, their information will be kept in order to be analyzed in the future in vacancies other than those initially applied.

Sensitive data: On the occasion of the treatment of data of employees, former employees and applicants for job vacancies, sensitive personal data may be processed, which will be managed under the conditions indicated in this Policy and under express authorizations of each of the holders in accordance with Law 1581 of 2012 and its regulatory norms.

Sensitive data is understood as those that affect the privacy of the Owner or whose improper use may generate their discrimination, such as those that reveal racial or ethnic origin, political orientation, religious or philosophical convictions, membership in 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, sexual life and biometric data.

Likewise, we guarantee the right to claim, to the databases for correction, updating or deletion, or when they notice the alleged breach of any of the duties contained in Law 1581 of 2012 and other applicable regulations. The claim will be processed under the following rules:

11. CONSULTATION AND CLAIMS PROCEDURE:

INEXMODA guarantees the right of consultation, supplying the people who act in exercise of this right, all the information contained in their individual registry or that is linked to the identification of the Owner. In order to establish a permanent channel of communication with the holders of the data, thus facilitating the timely and permanent attention to their queries, requests and claims, it has provided that whoever wants to exercise their right to know, rectify, delete or revoke authorization, can communicate clearly expressing the intention of your communication to the email datos.personales@inexmoda.org.co.

Once the mail has been received by the INEXMODA official, this company will have a term of 15 working days to respond to said query. INEXMODA has full freedom to enable new channels that facilitate the exercise of this right, which will be informed promptly. In case of impossibility to attend the query within said term, the interested party will be informed before the expiration of 15 days, stating the reasons for the delay and indicating the date on which his query will be answered, which in no case may exceed five (5) working days following the expiration of the first term.

Likewise, INEXMODA guarantees the right to claim, for the correction, updating or deletion of the information contained in the databases, or when they notice the alleged breach of any of the duties contained in Law 1581 of 2012 and other applicable regulations. The claim will be processed under the following rules:

If the claim received does not have complete information that allows it to be processed, such as, the identification of the owner, the description of the facts that give rise to the claim, the address, and accompanying the documents that you want to assert, the claimant will be required within five (5) working days of receipt to rectify faults. If two (2) months have elapsed from the date of the request without the applicant submitting the required information, it will be understood that the claim has been withdrawn.

1. If, for any reason, INEXMODA receives a claim addressed to another organization, it will transfer it to the appropriate person in said organization within a maximum term of two (2) working days and will inform the claimant of the situation.

2. Once the claim has been received in its entirety, it will include in the database maintained by INEXMODA a legend that says "claim in process" and the reason for it, within a term not exceeding two (2) working days. Said legend must be kept until the claim is decided.

3. The maximum term to attend the claim will be fifteen (15) working days counted from the day following the date of its receipt. When it is not possible to attend to it within said term, the interested party will be informed before the expiration of the aforementioned period of the reasons for the delay and the date on which his claim will be addressed, which in no case may exceed eight (8) days after the expiration of the first term.

11.1. Special rules for the exercise of the rights of the holders:

The request for rectification, update or deletion must be submitted through the channels enabled by INEXMODA, indicated in the privacy notice and in this document, and contain, as a minimum, the following information:

1. The name, address of the owner and means of contact to receive the response such as telephone, email, residence address.

2. Documents that prove the identity or representation of your representative.
3. The clear and precise description of the personal data with respect to which the owner seeks to exercise any of the rights.
4. If necessary, other elements or documents that facilitate the location of personal data.
5. INEXMODA, has the obligation to rectify and update at the request of the owner, the information of the latter that turns out to be incomplete or inaccurate, in accordance with the procedure and the terms indicated above. In this regard, the following will be taken into account:

11.2. Deletion of Data:

The owner has the right, at all times, to request INEXMODA, the deletion of their personal data when the user:

1. Consider that they are not being treated in accordance with the principles, duties and obligations set forth in Law 1581 of 2012.
2. They are no longer necessary or relevant for the purpose for which they were collected.
3. The period necessary for the fulfillment of the purposes for which they were collected has been exceeded.

This deletion implies the total or partial elimination of personal information in accordance with what is requested by the owner in the records, files, databases or treatments carried out by INEXMODA. The owner must warn that the right of cancellation is not absolute and the person responsible can deny the exercise of it when:

1. The owner has a legal or contractual duty to remain in the database.
2. Administrative actions related to tax obligations, the investigation and prosecution of crimes or the updating of administrative sanctions.
3. Are necessary to protect the legally protected interests of the owner; to carry out an action based on the public interest, or to fulfill an obligation legally acquired by the owner.

In case the cancellation of personal data is appropriate, INEXMODA must operatively perform the deletion in such a way that the deletion does not allow the information to be recovered.

11.3. Information security and security measures:

In development of the security principle established in the current regulations, INEXMODA has adopted the necessary technical, human and administrative measures to grant security to the registries avoiding their adulteration, loss, consultation, use or unauthorized or fraudulent access. These measures, their protocols and procedures are contained in the respective information security documents, which are reserved for the internal use of the organization.

11.4. INEXMODA's use and international transfer of personal data and personal information:

Depending on the nature of the permanent or occasional relationships that any person holding personal data may have with INEXMODA, all of their information may be transferred abroad, subject to applicable legal requirements, with the acceptance of this policy, authorizes expressly to transfer personal information. The information will be transferred, for all the relationships that may be established with INEXMODA, without prejudice to the obligation to observe and maintain the confidentiality of the information. INEXMODA will take the necessary measures so that these other parties know and commit to observe this Policy, with the understanding that the personal information they receive may only be used for matters directly related to their own relationship with INEXMODA and for the purposes expressly authorized by the owner, and may not be used or destined for a different purpose or purpose.

INEXMODA, may also exchange Personal Information with other governmental or public authorities (including, among other judicial or administrative authorities, tax authorities and criminal, civil, administrative, disciplinary and fiscal investigation bodies), and third parties participating in legal and civil proceedings, and their accountants, auditors, lawyers and other advisers and representatives, taking into account that it is necessary or appropriate to:

- a. to. Comply with applicable laws, including laws other than those of your country of residence.
- b. Comply with legal processes.
- c. Respond to requests from public authorities and the national government and different from those of your country of residence.
- d. Enforce our terms and conditions.
- e. Protect our operations.
- F. Protect our rights, privacy, security or property, yours or those of third parties.
- g. Obtain recoveries or limit the damages that may affect us.

11.5. Validity period of the databases:

The validity period of the databases will be the same validity period of the FUNDACIÓN INEXMODA, except for those bases whose purpose is for a one-time specific activity and its validity will be until the end of said activity.

11.6. Validity and Updating of the Policy

This policy is effective since May 14, 2020. When the terms of the privacy policy change in substance, as a general rule, a new authorization will be obtained in the manner established through the usual means of contact between the company and the Headlines. Any substantial change in the treatment policies will be communicated in a timely manner to the owners of the data through the usual means of contact and / or through: The web www.Inexmoda.org.co, Email sent to the owners: for holders who do not have access to electronic means or those who cannot be contacted, it will be communicated through open notices at the company's headquarters.