
POLICY FOR THE PROCESSING OF PERSONAL DATA



Nit: 901568975-2
Carrera 49 # 61 sur 540 Winery 102 The Regional Winery Park

Personal Data Processing Policy of the Sanrojal Foundation

1. Objective

This Personal Data Processing Policy (hereinafter, "the Policy") establishes the guidelines that the Sanrojal Foundation (hereinafter, "the Foundation"), identified with NIT:

901568975-2, follows for the collection, storage, use, circulation and deletion of the personal data of its internal and external users. The Foundation, in its capacity as Data Controller, acts in accordance with Statutory Law 1581 of 2012, Law 1266 of 2008, Decree 1377 of 2013, Decree 1074 of 2015, and other applicable regulations in Colombia. The objective is to guarantee the security and privacy of the personal information collected and processed by the Foundation.

2. Definitions

For the purposes of this Policy, the following definitions are used:

- **Partners:** Natural or legal persons who, through contracts or agreements with the Foundation, involve the transmission or transfer of personal data.
- **Authorization:** Prior, express and informed consent of the owner to carry out the processing of his or her personal data.
- **Database:** Organized set of personal data that is subject to processing.
- **Personal Data:** Any information associated with an identified or identifiable natural person.
- **Private Data:** Information of an intimate or reserved nature, relevant only to the owner.
- **Public Data:** Information classified as public by law, including, among others, data in public documents, enforceable court rulings not subject to reservation, and data related to marital status.
- **Sensitive Data:** Information that affects the privacy of the owner or whose misuse could lead to discrimination.

- **Semi-private data:** Information that is not private or public in nature, and whose knowledge may be of interest to the owner, a group of people, or society in general.
- **Data Processor:** Natural or legal person who, on behalf of the controller, processes personal data.
- **Data Protection Officer:** Employee of the Foundation in charge of ensuring compliance with this Policy.
- **Data Controller:** Natural or legal person who decides on the database and the processing of personal data.
- **Owner:** Natural person whose personal data is subject to processing.
- **Processing:** Operation or set of operations on personal data, such as collection, storage, use, circulation, or deletion.
- **Transfer:** Sending of personal data by the controller or processor in Colombia to a recipient who is also responsible for processing, inside or outside the country.
- **Transmission:** Communication of personal data within or outside Colombia, when the processing is carried out by a person in charge on behalf of the person responsible.

3. Description of Guidelines

3.1. Information on the Person Responsible for the Processing

The Sanrojal Foundation is located at Carrera 49 No. 61 Sur – 540, Warehouse 102, Parque de Bodegas la Regional, in the city of Sabaneta, Colombia. Telephone: 3153589657. Email: direccion@fundacionsanrojal.org.

3.2. Legal Framework

This Policy is governed by Statutory Law 1581 of 2012, regulated by Decree 1377 of 2013, Law 1266 of 2008, judgments C-1011 of 2008 and C-748 of 2011, among other concordant regulations.

3.3. Principles

To ensure effective protection of personal data, the Foundation follows these principles:

- **Legality:** The processing of personal data complies with the rules that regulate its protection.
- **Purpose:** The processing must obey a legitimate purpose, informed to the owner.
- **Freedom:** The processing is only carried out with the prior, express and

informed consent of the owner.

- **Truthfulness or Quality:** The information processed must be truthful, complete, accurate, up-to-date, verifiable and understandable.
- **Transparency:** The right of the owner to know, at any time, the existence of data that concerns him is guaranteed.
- **Restricted Access and Circulation:** The processing is limited to persons authorized by the owner and/or by law.
- **Security:** Personal data is handled with technical, human and administrative measures that ensure its integrity.
- **Confidentiality:** The confidentiality of the information is guaranteed, even after the relationship with the owner has ended.
- **Demonstrated Responsibility:** The Foundation must demonstrate the implementation of appropriate measures to comply with the applicable regulations.

3.4. Processing of Personal Data

The Foundation processes personal data in accordance with the nature of the data and the purposes established in this Policy. These treatments include the collection, storage, use, updating, rectification, deletion and elimination of personal data.

Natural Persons in Programs: The personal information of participants in the Foundation's programs is processed for their identification, program implementation, background checks, and other purposes related to the execution of the programs.

Users of the Website: The personal data of website users is collected to improve the browsing experience, respond to queries, and perform maintenance. Cookies are also used for online tracking and to improve the security and personalization of the service.

3.5. Processing of Sensitive Data

The Foundation may process sensitive data, ensuring that the explicit authorization of the owner is obtained, except for legal exceptions. The protection and confidentiality of this data is guaranteed, especially that related to health, racial origin, political orientation, and other aspects that may generate discrimination.

3.6. Processing of Data of Children and Adolescents

The Foundation will process the personal data of minors with the authorization of their parents or legal representatives. The processing must respect the best interests of the minor and his/her fundamental rights.

3.7. Processing of Data of Minors in the Foundation's Programs

The processing of personal data of minors participating in the Foundation's programs is carried out in accordance with Law 1581 of 2012, respecting their best interests and ensuring the protection of their fundamental rights.

3.8. Rights of the Owners

The owners of personal data have the following rights:

- Access their personal data that has been processed by the Foundation.
- Know update and rectify the information that has been collected about them.
- Request proof of the authorization granted for the processing of their personal data.
- Be informed by the Foundation, upon request, about the use that has been given to their personal data.
- File complaints with the Superintendency of Industry and Commerce for violations of the provisions of Law 1581 of 2012.
- Revoke the authorization and/or request the deletion of your data when the processing does not respect the constitutional and legal principles, rights and guarantees.
- Access free of charge your personal data that has been subject to processing.

3.9. Duties of the Sanrojal Foundation as Data Controller

The Foundation assumes the following duties:

- Guarantee the owner the full and effective exercise of the right to habeas data.
- Request and retain a copy of the respective authorization granted by the owner.

- Clearly inform the owner about the purpose of the data collection and the rights that assist him by virtue of the authorization granted.
- Keep the information under the necessary security conditions to prevent its adulteration, loss, consultation, unauthorized or fraudulent use or access.
- Update the information promptly when necessary.
- Rectify the information when it is incorrect and make the pertinent updates.
- Process the queries and claims made by the owners in the terms established by law.
- Adopt an internal manual of policies and procedures to guarantee the appropriate treatment of personal data.

3.10. Duties of the Sanrojal Foundation as Data Processor

When the Foundation acts as Data Processor, it must comply with the following duties:

- Carry out the treatment in accordance with the instructions of the Controller.
- Safeguard the security of the information in its custody.
- Inform the Controller in a timely manner of any violation of the security measures.
- Apply procedures to handle and manage queries and complaints made by the owners.

3.11. Procedures for the Attention and Response to Queries, Complaints and Requests

The Foundation has established the following procedures:

3.11.1. Queries

The owners may consult their personal data held by the Foundation. The Foundation will provide all the information contained in the individual record or that is linked to the identification of the owner. Queries will be answered within a maximum period of ten (10) business days from the date of receipt of the same. If it is not possible to answer the query within this period, the owner will be informed, stating the reasons for the

delay and indicating the date on which his query will be answered, which may not exceed five (5) business days following the expiration of the first period.

3.11.2. Complaints

Any owner who considers that the information contained in a database should be corrected, updated or deleted, or who notices the alleged non-compliance with any of the duties contained in the law, may file a complaint with the Foundation. This will be processed under the following rules:

- The complaint will be made through a request addressed to the Foundation, with the identification of the owner, the description of the facts that give rise to the complaint, the address, and accompanying the documents that the applicant wishes to assert.
- If the complaint is incomplete, the interested party will be required within five (5) business days following receipt of the complaint to correct the deficiencies.
- After two (2) months from the date of the request, without the applicant submitting the required information, it will be understood that the complaint has been withdrawn.
- If the claim is valid, it will be resolved within a maximum period of fifteen (15) business days from the day following the date of its complete receipt.

3.11.3. Requests for Update and Rectification

The holder may request the update of the information when appropriate. This request will be attended to within a maximum period of fifteen (15) business days from the date of receipt of the same.

3.11.4. Revocation of Authorization and/or Deletion of Data

The holders have the right to revoke at any time the authorization granted for the processing of their personal data or request the deletion of the same, provided that there is no legal or contractual obligation that prevents their elimination.