

Table of contents

1. IDENTIFICATION OF PERSON RESPONSIBLE.....	2
2. INTRODUCTION.....	2
3. OBJECTIVE	2
4. SCOPE	3
5. DEFINITIONS.....	3
6. GUIDING PRINCIPLES APPLICABLE IN THE FIELD OF PERSONAL DATA	3
7. RIGHTS OF THE OWNERS	4
7.1 Mechanisms to exercise the rights of the owners.....	5
8. AUTHORIZATION OF THE PERSONAL DATA HOLDER.....	5
8.1 Events in which the authorization is not necessary.....	5
9. DUTIES OF IMA INDUSTRIA DE ARTÍCULOS DE MADERA S.A.S. AS RESPONSIBLE FOR THE PROCESSING OF PERSONAL DATA IMA INDUSTRIA DE ARTÍCULOS DE MADERA S.A.S.	5
10. POLICIES FOR THE PROCESSING OF PERSONAL DATA	6
10.1 General Policy for the processing of Personal Data	6
10.2 Policy for the treatment of personal data of collaborators.....	7
10.3 Shareholders' personal data processing policy	8
10.4 Processing of personal data of Suppliers	8
10.5 Processing of personal data of customers.....	9
10.6 Processing of personal data of Video Surveillance Record.....	10
10.7 Treatment of personal data of Entrance Control.....	10
11. INTERNATIONAL TRANSFER AND TRANSMISSION OF PERSONAL DATA	11
12. DATA OF CHILDREN AND ADOLESCENTS	11
13. PROCEDURE FOR THE ATTENTION OF CONSULTATIONS, CLAIMS AND PETITIONS.....	11
13.1 Consultations.....	11
13.2 Claims.....	11
13.3 Procedural requirement	12
13.4 Request for update and/or rectification	12
13.5. Revocation of the authorization and/or deletion of the Data.....	12
14. MODIFICATION OF POLICIES.....	13

 INDUSTRIA DE ARTÍCULOS DE MADERA	PERSONAL DATA PROCESSING MANUAL	ADM-01
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Table of Contents

1. IDENTIFICATION OF PERSON RESPONSIBLE.

In compliance with the provisions of the Statutory Law 1581 of 2012 and its Regulatory Decrees, the company IMA INDUSTRIA DE ARTÍCULOS DE MADERA S.A.S., establishes the applicable Policies for the Processing and Protection of Personal Data in the organization.

- IDENTIFICATION OF THE CONTROLLER - NAME OF THE COMPANY: IMA INDUSTRIA DE ARTÍCULOS DE MADERA S.A.S., commercial company identified with NIT. No. 860.002.122-1 is constituted as a Colombian company, with the corporate purpose of: manufacture of furniture; manufacture of parts and pieces of wood, carpentry and joinery for construction; non-specialized wholesale trade and retail trade of household appliances and gas appliances for domestic use, furniture and lighting equipment. –
- PHYSICAL ADDRESS: Carrera 68 D N°. 18 - 80. –
- E-MAIL ADDRESS: www.imafurniture.com –
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2. INTRODUCTION

The company IMA INDUSTRIA DE ARTÍCULOS DE MADERA S.A.S., respectful of the rule of law and especially of the Magna Carta of 1991, specifically Article 15 which states: “All persons have the right to their personal and family privacy and to their good name, and the State must respect them and make them respect them. “and in accordance with Law 1581 of October 17, 2012 (Colombia); it is allowed to guarantee the constitutional right of all persons to know, update, rectify, delete and revoke the authorization regarding the information collected about them in the databases that the Company has collected for the purposes provided by law and the respective authorizations, which have been treated in accordance with the provisions of the national regime for the protection of personal data. It is also allowed to establish this Policy for the Treatment and Protection of Personal Data.

3. OBJECTIVE

To establish the general guidelines for the protection and processing of personal data within IMA INDUSTRIA DE ARTÍCULOS DE MADERA S.A.S, thus allowing to strengthen the level of trust between those responsible and the Holder in relation to the processing of their information; Inform the Holder of the purposes and transfers to which their personal data are subjected and the mechanisms and forms for the exercise of their rights.

4. SCOPE

This Personal Data Protection Manual shall apply to all Databases and/or Files that include Personal Data that are subject to Processing by IMA INDUSTRIA DE ARTÍCULOS DE MADERA S.A.S. as the party responsible for the processing of Personal Data.

5. DEFINITIONS

Habeas Data: The right of every person to know update and rectify the information that gathered over about him/her in files and data banks of public or private nature.

Personal Data: Any information linked or that may be associated to one or several determined or determinable natural persons.

Database: Organized set of Personal Data that is subject to Processing.

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

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

Privacy Notice: It is the physical, electronic or any other known or to be known format document, which is made available to the Data Subject for the processing of his/her Personal Data.

Data Subject: Natural person whose personal data is the object of Processing

Beneficiary: Person who by succession or transmission acquires the rights of another person.

Data Controller: Natural or legal person, public or private, who by himself or in association with others, decides on the database and/or the Processing of the data.

Data Processor: Natural or legal person, public or private, that by itself or in association with others, carries out the Processing of personal data on behalf of the Data Controller.

6. GUIDING PRINCIPLES APPLICABLE IN THE FIELD OF PERSONAL DATA

The following guiding principles shall apply in the field of personal data protection:

a) **Principle of legality in the field of data processing:** The Processing referred to in this law is a regulated activity that must be subject to the provisions set forth herein and in the other provisions that develop it.

b) **Principle of purpose:** The Processing must obey a legitimate purpose in accordance with the Constitution and the Law, which must be informed to the Data Subject.

c) **Principle of freedom:** The Processing may only be exercised with the prior, express and informed consent of the Data Subject. Personal data may not be obtained or disclosed without prior authorization, or in the absence of legal or injunction, that relieves the consent.

- d) Principle of truthfulness or quality: The information subject to Processing must be truthful, complete, accurate, updated, verifiable and understandable. The Processing of partial, incomplete, fractioned or misleading data is prohibited.
- e) Principle of transparency: The Processing must guarantee the right of the Data Subject 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.
- f) Principle of restricted access and circulation: The Processing is subject to the limits derived from the nature of the personal data, the provisions of this law and the Constitution. In this sense, the Processing may only be carried out by persons authorized by the Data Subject and/or by the persons provided for in this 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 Data Controllers or third parties authorized under this law.
- g) Principle of security: The information subject to Processing by the Data Controller or Data Processor referred to in this law, shall be handled with the technical, human and administrative measures necessary to provide security to the records, avoiding their adulteration, loss, consultation, use or unauthorized or fraudulent access.
- h) Principle of confidentiality: All persons involved 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 involved in the processing, and may only provide or communicate personal data when it corresponds to the development of the activities authorized in this law and under the terms of the same.

7. RIGHTS OF THE OWNERS

The Personal Data Owners shall enjoy the following rights, and those granted to them by the Law:

- a) To know, update and rectify their personal data against the Data Controllers or 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;
- b) Request proof of the authorization granted to the Data Controller, except when expressly exempted as a requirement for the Processing, in accordance with the provisions of article 10 of this law
- c) Be informed by the Data Controller or the Data Processor, upon request, regarding the use made of their personal data
- d) File complaints before the Superintendence of Industry and Commerce for infringements to the provisions of this law and other regulations that modify, add or complement 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. The revocation and/or deletion shall proceed when the Superintendence of Industry and Commerce has determined that in the Processing the Controller or Processor has incurred in conduct contrary to this law and the Constitution;

f) Access free of charge to their personal data that have been subject to Processing.

7.1 Mechanisms to exercise the rights of the owners

The Data Subject may exercise his/her rights by contacting the entity through written communication addressed to the GENERAL MANAGEMENT, such communication may be sent attached to the e-mail habeasdata@imasa.com.co or through written communication filed at Carrera 68 D N° 18 - 80, in the city of Bogotá D. C.

8. AUTHORIZATION OF THE PERSONAL DATA HOLDER

Without prejudice to the exceptions provided for in the Statutory Law 1581 of 2012, as a general rule in the Processing of Personal Data IMA INDUSTRIA DE ARTÍCULOS DE MADERA S.A.S. will collect the prior and informed authorization of the Holder, which may be obtained by any means that may be subject to subsequent consultation.

8.1 Events in which the authorization is not necessary

The authorization of the Holder shall not be necessary when dealing with:

- a) Information required by a public or administrative entity in the exercise of its legal functions or by court order;
- b) Data of a public nature;
- c) Cases of medical or health emergency;
- d) Processing of information authorized by law for historical, statistical or scientific purposes;
- e) Data related to the Civil Registry of Persons.

9. DUTIES OF IMA INDUSTRIA DE ARTÍCULOS DE MADERA S.A.S. AS RESPONSIBLE FOR THE PROCESSING OF PERSONAL DATA IMA INDUSTRIA DE ARTÍCULOS DE MADERA S.A.S.

As responsible for the Processing of Personal Data, shall comply with the following duties:

- a) Guarantee the Holder, at all times, the full and effective exercise of the right of habeas data.
- b) Request and keep, under the conditions set forth in the Law, a copy of the respective authorization granted by the Data Subject.
- c) Duly inform the Data Subject about the purpose of the collection and the rights he/she is entitled to 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 Controller is truthful, complete, accurate, updated, verifiable and understandable.
- f) Update the information, communicating in a timely manner to the Data Processor, all developments with respect to the data previously provided and take other necessary measures to ensure that the information provided to it is kept up to date.
- g) Rectify the information when it is incorrect and communicate the pertinent to the Data Processor.
- h) Provide the Processor, as applicable, only data for which Treatment is previously authorized in accordance with the provisions of this law.
- i) Require the Processor at all times, compliance with the conditions of security and privacy of the Data Controller's information.
- j) Demand from the Data Processor at all times, respect for the security and privacy conditions of the Data Subject's information. To process the queries and claims formulated in the terms set forth in the Statutory Law 1581 of 2012.
- k) Adopt an internal manual of policies and procedures to ensure proper compliance with the Law and, in particular, for the handling of queries and claims.
- l) Inform the Processor when certain information is under discussion by the Data Controller, once the complaint has been submitted and the respective procedure has not been completed.
- m) Inform at the request of the Data Subject about the use given to his/her data.
- n) Inform the data protection authority when there are violations to the security codes and there are risks in the administration of the Data Subject's information.
- o) Comply with the instructions and requirements given by the Superintendence of Industry and Commerce.

10. POLICIES FOR THE PROCESSING OF PERSONAL DATA

10.1 General Policy for the processing of Personal Data

MA INDUSTRIA DE ARTÍCULOS DE MADERA S.A.S is committed to complying with the provisions established by current regulations related to data protection, in order to respect and guarantee the rights of habeas data, freedom, computer self-determination, privacy, among others, of the holders of personal information that is processed within the organization, under the existence of a commercial, civil or labor relationship. In this sense, any natural and/or legal person who provides information related to personal data, shall have the power to authorize the use and processing thereof, update, correct or rectify it.

10.2 Policy for the treatment of personal data of collaborators

IMA INDUSTRIA DE ARTÍCULOS DE MADERA S.A.S. collects the personal data of its employees, which are classified by the company as confidential, and will only be disclosed by the company with the express authorization of the owner or when a Competent Authority requests it. The purposes for which the personal data of the company's employees are used will be:

- a) To comply with the obligations imposed by Colombian labor law to the employees, or the orders issued by the competent Colombian authorities;
- b) To manage the information for the payment of the obligations imposed by the social security system.
- c) To comply with the tax obligations imposed by the State and its affiliated entities.
- d) To issue certifications regarding the relationship of the owner of the data with the company.
- e) To comply with the obligations imposed in relation to the RISK MANAGEMENT OF MONEY LAUNDERING, TERRORIST FINANCING AND FINANCING OF THE PROLIFERATION OF WEAPONS OF MASS DESTRUCTION (ML / FT / FPADM) and thus execute the obligations imposed by the Superintendence of Corporations.
- f) Manage the functions developed by the collaborators.
- g) Consult memorandums or calls for attention.
- h) Develop and apply the disciplinary process.
- i) Contact in emergency cases.
- j) Others specifically established in the authorizations granted by the collaborators.

Likewise, IMA INDUSTRIA DE ARTÍCULOS DE MADERA S.A.S, stores personal data that have been obtained in the development of the selection process of its employees in a folder identified with the name of each of them.

Such folder will only have access and will be treated by the area of Human Management, in order to manage the contractual relationship between IMA INDUSTRIA DE ARTÍCULOS DE MADERA S.A.S. and the employee.

IMA INDUSTRIA DE ARTÍCULOS DE MADERA S.A.S. treats all the data of the unionized collaborators for the due fulfillment of their legal or conventional obligations as a collaborator, and in any case always respect the rights acquired by them in compliance with the law.

Upon termination of the employment relationship, IMA INDUSTRIA DE ARTÍCULOS DE MADERA S.A.S. will proceed to store all personal data obtained from the selection process and the documentation generated in the development of the employment relationship, in a central file, subjecting the information at all times to appropriate security measures and levels, since the labor information may contain sensitive data. In any

case, the information will not be processed for a period of more than twenty (20) years from its collection in accordance with the legal or contractual circumstances that make it necessary to handle the information.

10.3 Shareholders' personal data processing policy

IMA INDUSTRIA DE ARTÍCULOS DE MADERA S.A.S. collects the personal data of its Shareholders and stores them in a database which is classified by the company as confidential, and will only be disclosed by the company with the express authorization of the owner or when requested by a Competent Authority.

The purposes for which the personal data of the Shareholders of IMA INDUSTRIA DE ARTÍCULOS DE MADERA S.A.S. are used are:

- a) To comply with the obligations imposed in relation to the RISK MANAGEMENT OF MONEY LAUNDERING, TERRORIST FINANCING AND FINANCING OF THE PROLIFERATION OF WEAPONS OF MASS DESTRUCTION (ML / FT / FPADM) and thus execute the obligations imposed by the Superintendence of Corporations.
- b) Enable the exercise of the duties and rights derived from the quality of shareholder;
- c) Send invitations to events scheduled by the Company and in general contact the shareholder;
- d) Issue certifications regarding the relationship of the owner of the data with the Company;
- e) Others specifically established in the authorizations granted by the shareholders.

In any case, the information will not be processed for a period longer than the time the person is a shareholder of the company or the additional time required according to the legal or contractual circumstances that make it necessary to handle the information.

Finally, access to such personal information shall be carried out in accordance with the provisions of the Code of Commerce and other regulations governing the matter.

10.4 Processing of personal data of Suppliers

IMA INDUSTRIA DE ARTÍCULOS DE MADERA S.A.S. collects the personal data of its Suppliers and stores them in a database which is classified by the company as confidential, and will only be disclosed by the company with the express authorization of the owner or when requested by a Competent Authority.

The purposes for which the personal data of the Suppliers of IMA INDUSTRIA DE ARTÍCULOS DE MADERA S.A.S. are used will be:

- a. To comply with the obligations imposed in relation to the RISK MANAGEMENT OF MONEY LAUNDERING, TERRORIST FINANCING AND FINANCING OF THE PROLIFERATION OF WEAPONS OF MASS DESTRUCTION (ML / FT / FPADM) and thus execute the obligations imposed by the Superintendence of Companies.
- b. Sending invitations to contract and arranging for the pre-contractual, contractual and post-contractual stages.

- c. Development of audits for compliance with requirements in the contracting processes.
- d. Sending invitations to events programmed by the Company or its affiliates.
- e. The others specifically established in the authorizations granted by the suppliers themselves.

IMA INDUSTRIA DE ARTÍCULOS DE MADERA S.A.S. will only collect from its suppliers the data that are necessary, relevant and not excessive for the purpose of selection, evaluation and execution of the contract.

The collection of personal data from suppliers by IMA INDUSTRIA DE ARTÍCULOS DE MADERA S.A.S. will have in any case the purpose of verifying the moral suitability and competence of suppliers; that is, once verified this requirement, IMA INDUSTRIA DE ARTÍCULOS DE MADERA S.A.S. will return such information to the supplier, unless expressly authorized its conservation.

In any case, the information will not be processed for a period longer than the time that the person is a supplier of the company or the additional time required according to the legal or contractual circumstances that make necessary the handling of the information.

10.5 Processing of personal data of customers

IMA INDUSTRIA DE ARTÍCULOS DE MADERA S.A.S. collects personal data of its customers and stores them in a database which is classified by the company as reserved, and will only be disclosed by the company with the express authorization of the owner or when requested by a Competent Authority.

The purposes for which the personal data of IMA INDUSTRIA DE ARTÍCULOS DE MADERA S.A.S.'s customers are used will be:

- a) Comply with the obligations imposed in relation to the RISK MANAGEMENT OF MONEY LAUNDERING, TERRORIST FINANCING AND FINANCING OF THE PROLIFERATION OF WEAPONS OF MASS DESTRUCTION (ML/FT/FPADM) and thus execute the obligations imposed by the Superintendence of Companies.
- b) Carrying out the pre-contractual, contractual and post-contractual stages.
- c) Sending invitations to events scheduled by the Company.
- d) To corroborate any requirement that may arise in the development of the contract entered into.
- e) To comply with the purpose of the contract entered into.
- f) To verify cases of non-compliance by any of the parties.
- g) General relationship with each client.
- h) To carry out customer loyalty activities and marketing operations.
- i) Any other specifically established in the authorizations granted by the clients themselves.

In any case, the information will not be processed for a period longer than the time the person is a customer of the company or the additional time required according to the legal or contractual circumstances that make it necessary to handle the information.

10.6 Processing of personal data of Video Surveillance Record

IMA INDUSTRIA DE ARTÍCULOS DE MADERA S.A.S. collects the biometric data contained in its Surveillance Cameras and stores them in a database which is classified by the company as confidential, and will only be disclosed by the company with the express authorization of the owner or when requested by a Competent Authority.

The purposes for which the personal data contained in the Surveillance Cameras of IMA INDUSTRIA DE ARTÍCULOS DE MADERA S.A.S. are used will be:

- a) To guarantee security in work environments.
- b) To allow adequate work environments for the safe development of the company's work activities.
- c) To control the entrance, permanence, exit of collaborators, contractors, third parties and equipment in the company's facilities.
- d) To guarantee security and surveillance in the entrance of customers to the points of sale.

To comply with the duty of information that corresponds to IMA INDUSTRIA DE ARTÍCULOS DE MADERA S.A.S. As administrator of personal data, the company will implement Privacy Notices in areas where the capture of images that involve the processing of personal data is performed.

In any case, the information will not be processed for a period exceeding forty (40) days from its collection in accordance with the legal or contractual circumstances that make necessary the handling of the information.

10.7 Treatment of personal data of Entrance Control

IMA INDUSTRIA DE ARTÍCULOS DE MADERA S.A.S. collects the personal data of its visitors and stores them in a database which is qualified by the company as reserved, and will only be disclosed by the company with the express authorization of the owner or when a Competent Authority requests it.

The purposes for which the personal data of those who enter the facilities of IMA INDUSTRIA DE ARTÍCULOS DE MADERA S.A.S. and the facilities of the company's customers are used will be:

- a) Ensure the entry to the company's facilities to people who have the authorization of free transit and restrict the passage to those who are not authorized.
- b) Ensure security in the monitored environments.
- c) Allow adequate working environments for the safe development of activities within the company.

In any case, the information will not be processed for a period of more than three (3) years from its collection in accordance with the legal or contractual circumstances that make it necessary to handle the information.

11. INTERNATIONAL TRANSFER AND TRANSMISSION OF PERSONAL DATA

The company currently does not carry out international transmission or transfer of personal data. In the event that the company decides to carry out the international transfer or transmission of personal data, in addition to having the express and unequivocal authorization of the Data Subject, IMA INDUSTRIADE ARTÍCULOS DE MADERA S.A.S., will ensure that the country to which the data is transferred or transmitted provides adequate levels of data protection, which in no case may be lower than those set in Colombia by the Statutory Law 1581 of 2012 and its regulatory decrees.

12. DATA OF CHILDREN AND ADOLESCENTS

IMA INDUSTRIA DE ARTÍCULOS DE MADERA S.A.S., does not process Personal Data of minors. However, when it does so, the company will guarantee respect for the rights of children and adolescents, which prevail in any case, and will collect in all cases the respective authorization for its treatment.

13. PROCEDURE FOR THE ATTENTION OF CONSULTATIONS, CLAIMS AND PETITIONS

13.1 Consultations

The Holders or their assignees may consult the personal information of the Holder that is stored in IMA INDUSTRIA DE ARTÍCULOS DE MADERA S.A.S. who will be responsible for providing all the information contained in the individual record or that is linked to the identification of the Holder. The consultation once received by the company, will be answered within a maximum period of ten (10) working days from the date of receipt of the same. When it is not possible to answer the query within such term, the interested party shall be informed, stating the reasons for the delay and indicating the new date on which such query will be answered, which in no case may exceed five (5) business days following the expiration of the first term.

13.2 Claims

The Data Subject or its assignees who consider that the information contained in a database should be corrected, updated or deleted, or when they notice the alleged breach of any of the duties contained in this law, may file a claim with IMA INDUSTRIA DE ARTÍCULOS DE MADERA S.A.S., which will be processed under the following rules:

1. The claim shall be made by written communication addressed to IMA INDUSTRIA DE ARTÍCULOS DE MADERA S.A.S., with the identification of the Holder, the description of the facts that give rise to the claim, the address, and accompanying the documents you want to assert.

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

In the event that IMA INDUSTRIA DE ARTÍCULOS DE MADERA S.A.S. receives a claim which is not competent to resolve it, the company will transfer it to the person who actually corresponds within a maximum period of two (2) working days and inform the Holder.

2. Once the complete claim has been received, the company will include in the respective database a legend that reads “claim in process” and the reason for the claim, within a term no longer than two (2) business days. The company shall keep such legend in the data under discussion until the claim is decided.

3. The maximum term to address the claim shall be fifteen (15) business days from the day following the date of its receipt. When it is not possible to address the claim within such term, the company shall inform the Holder the reasons for the delay and the new date on which the claim will be addressed, which in no case may exceed eight (8) business days following the expiration of the first term.

13.3 Procedural requirement

The Data Subject or its assignee may only file a complaint with the Superintendence of Industry and Commerce once the Consultation or Claim process has been exhausted directly with the company.

13.4 Request for update and/or rectification

IMA INDUSTRIA DE ARTÍCULOS DE MADERA S.A.S. will rectify and update, at the request of the holder, the information that is inaccurate or incomplete, following the procedure and the terms indicated above, for which the Holder must submit the request according to the channels provided by the company, indicating the update and rectification of the data and in turn must provide documentation to support such request.

13.5. Revocation of the authorization and/or deletion of the Data

The Data Subject may revoke at any time the consent or Authorization given for the processing of his/her personal data, as long as there is no impediment enshrined in a legal or contractual provision.

The Data Subject also has the right to request at any time to IMA INDUSTRIA DE ARTÍCULOS DE MADERA S.A.S., the deletion or elimination of his personal data when:

- a) He considers that they are not being processed in accordance with the principles, duties and obligations under current regulations.
- b) They are no longer necessary or relevant for the purpose for which they were obtained.
- c) The time necessary for the fulfillment of the purposes for which they were obtained has been fulfilled.

Such deletion implies the total or partial elimination of personal information, as requested by the holder in the records, files, databases or processing carried out by IMA INDUSTRIA DE ARTÍCULOS DE MADERA S.A.S.

The right of cancellation is not absolute and therefore IMA INDUSTRIA DE ARTÍCULOS DE MADERA S.A.S. may deny revocation, disavowal or deletion of personal data in the following cases:

- a) The holder has a legal or contractual duty to remain in the database.
- b) The elimination of data hinders judicial or administrative actions related to tax obligations, the investigation and prosecution of crimes or the updating of administrative sanctions.
- c) The data is necessary to protect the legally protected interests of the holder; to carry out an action in the public interest, or to comply with an obligation legally acquired by the holder.

14. MODIFICATION OF POLICIES

The entity reserves the right to modify the Personal Data Processing Policy at any time. However, any modification will be communicated in a timely manner to the Personal Data Holders through the usual means of contact ten (10) business days prior to its entry into force.

In the event that a Data Subject does not agree with the new Policies and with valid reasons that constitute a just cause for not continuing with the authorization for the processing of personal data, the Data Subject may request the company to withdraw his/her information through the channels indicated in chapter 11. However, Data Subjects may not request the withdrawal of their personal data when the company has a legal or contractual duty to process the data.

CHANGES HISTORY

Date of update December 21, 2023 Reason for change Codification Document.