

 <b>nuvant</b>	<b>PERSONAL DATA PROCESSING POLICY</b>	RL 9.4.3.4-021/06
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## PERSONAL DATA PROCESSING POLICY

### NUVANT S.A.S

#### 1. **Company information**

- Company name: NUVANT S.A.S.
- Address: CL 61 SUR No 43A-290, SABANETA, ANTIOQUIA 055450, COLOMBIA
- TAX ID: 890906119-6
- Mail address: CL 61 SUR No 43A-290, SABANETA, ANTIOQUIA 055450, COLOMBIA
- Email: [NuvantHD@nuvantglobal.com](mailto:NuvantHD@nuvantglobal.com)
- Phone: +57(4) 3788686 EXT 15170


1.1. **OBJECTIVE:** This policy applies to all holders of personal information that is used and / or found in the databases of the company **NUVANT S.A.S.** who acts as responsible for the processing of personal data.

**NUVANT S.A.S** is committed to the rights of its customers, employees and third parties in general. That is why it adopts the following manual of policies and procedures for the processing of information, which must be applied in all activities that involve, totally or partially, the collection, storage, use, circulation and transfer of such information.

These policies are mandatory for **NUVANT S.A.S**, as responsible, as well as all third parties acting on behalf of the Company, or without acting on behalf of **NUVANT S.A.S** use personal data by order of it as managers.

Both the person in charge and managers, as well as, employees, contractors and third parties must observe and respect these policies in the fulfillment of their functions and / or activities even after the termination of legal, commercial, labor or any other kind of links. Likewise, they undertake to keep strict confidentiality in relation to the data processed.

1.2. **GLOSSARY:** For the application of this policy, the following definitions will be taken into account:

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- a) **RESTRICTED ACCESS:** Level of access to information limited to previously defined parameters. NUVANT S.A.S will not make Personal Information available for access through the Internet or other mass communication media, unless technical measures are established to control access and restrict it only to Authorized persons.
- b) **AREA RESPONSIBLE FOR ATTENTION TO REQUESTS, COMPLAINTS, CLAIMS AND INQUIRIES:** The requests, complaints, claims and queries made by the data owners will be dealt with by the Data Protection Officer.
- c) **DATABASE:** Organized set of Personal Data that are subject to treatment. Includes physical and electronic files.
- d) **RESTRICTED CIRCULATION:** Personal data will only be processed by those NUVANT S.A.S personnel or those who, within their functions, 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 NUVANT, to process them.
- e) **CONFIDENTIALITY:** Information security element that allows establishing who and under what circumstances can access it.
- f) **PERSONAL DATA:** Any information linked to or that may be associated with one or more specific or determinable natural persons. The "personal data" should then be understood as information related to a natural person (person individually considered).
- g) **PUBLIC DATA:** It is data that is not semi-private, private or sensitive. Public data is considered, among others, data related to people's marital status, their profession or job and their status as a merchant or public servant. By its nature, public data may be contained, among others, in public records, public documents, gazettes and official gazettes and duly enforceable judicial decisions that are not subject to reservation.
- h) **SEMI-PRIVATE DATA:** It is that information that is not of an intimate, reserved or public nature and whose knowledge or disclosure may interest not only its owner but also a certain sector or group of people or society in general, as is the case of the financial, credit or business data
- i) **SENSITIVE DATA:** 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 unions or guilds, social, human rights organizations or organizations that promote the interests of any

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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.

j) **RIGHT 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.

k) **TREATMENT MANAGER:** 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 Responsible for the Treatment. NUVANT S.A.S, acts as the person in charge of the processing of personal data in the cases, in which by itself or in association with others, carries out the processing of personal data on behalf of a person responsible for the treatment.

l) **RESPONSIBLE FOR THE TREATMENT:** Natural or legal person, public or private, that by itself or in association with others, decides on the database and / or the Treatment of the data. NUVANT acts as the person responsible for the processing of personal data against all personal data on which it decides directly, in compliance with its own legally recognized functions.

m) **HOLDER:** Natural person whose personal data is subject to Treatment.

n) **TREATMENT:** It is any operation or set of operations on Personal Data that NUVANT or the Treatment Managers carry out, such as the collection, storage, use, circulation or deletion.

**1.3. PURPOSE:** In accordance with the provisions of Law 1581 of 2012 and in accordance with the authorizations issued by the holders of the information, NUVANT S.A.S will carry out operations or set of operations that include data collection, storage, use, circulation and / or suppression; This Data Processing will be carried out exclusively for the authorized and foreseen purposes 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, personal data will be treated in accordance with the interest group and in proportion to the purpose or purposes of each treatment, as described below:

## **2. TREATMENT TO WHICH THE PERSONAL DATA AND ITS PURPOSE WILL BE SUBMITTED.**

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The treatment that **NUVANT S.A.S** will carry out with the personal information will be the following:

**2.1. Collection:** NUVANT S.A.S collects data from its suppliers, employees, customers, contractors, through virtual media and manual formats.

**2.2. Storage:** The data is stored in our own servers and folders; Only those responsible or employees of the corresponding processes can access them and its disclosure is prohibited.

**2.3. Use:** The data collected is used by those responsible for the process and its own staff. They are used for the following purposes:

- a) Carry out the pertinent steps for the development of the company's corporate purpose in relation to the fulfillment of the object of the agreement entered into with the Owner of the information.
- b) Make invitations to events and offer new products and services.
- c) Manage procedures (requests, complaints, claims).
- d) Carry out satisfaction surveys regarding the products offered by Nuvant S.A.S
- e) Contact the Owner through email to send extracts, account statements or invoices in relation to the obligations arising from the contract between the parties.
- f) Comply with the obligations contracted by Nuvant S.A.S with the Holder of the Information, in relation to the payment of salaries, social benefits and other remuneration enshrined in the employment contract or as provided by law (in the case of employees of the organization).
- g) Offer corporate welfare programs and plan business activities for the owner and their beneficiaries (children, spouse, permanent companion).
- h) Provide the information to third parties with whom Nuvant S.A.S has a contractual relationship and that it is necessary to deliver it to fulfill the contracted object.

**2.4. Circulation:** The data circulates within each process and with third parties with which Nuvant S.A.S has a contractual relationship and that it is necessary to deliver it for the fulfillment of the contracted object.

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**2.5. Destruction:** The destruction of documents depends on the continuity of business with third parties, the provisions that have been agreed by the parties and the applicable legal requirements for the disposition of these.

### 3. **HOLDERS RIGHTS.**

In accordance with the provisions of article 8 of Law 1581 of 2012 and decree 1377 of 2013, the owner of personal data has the following rights against **NUVANT S.A.S**:

- a) To know, update and rectify your personal data against **NUVANT S.A.S**, in its capacity as responsible for the treatment.
- b) Request proof of the authorization granted to **NUVANT S.A.S**, in its capacity as Responsible for the Treatment.
- c) To be informed by **NUVANT S.A.S** upon request, regarding the use that it will provide to your personal data.
- d) Submit complaints to the Superintendency of Industry and Commerce for infractions of the provisions of Law 1581 and other regulations that modify, add or complement it.
- e) Revoke the authorization and / or request the deletion of the data when the treatment does not respect the principles, rights and constitutional and legal guarantees.
- f) Access free of charge to the personal data of owners who have been the object of treatment.

### 4. **EXERCISE AND PROCEDURE TO EXERT THE RIGHTS TO HABEAS DATA.**

**NUVANT S.A.S** has an administrative infrastructure designed, among other functions, to ensure due attention to requirements, requests, queries, complaints and claims related to data protection, in order to guarantee the exercise of the rights contained in the Constitution and the law. especially the right to know, update, rectify and delete personal information; as well as the right to revoke the consent granted for the processing of personal data. For inquiries, complaints, or for the exercise of the rights that assist you as the owner of information (personal data), you can contact **NUVANT S.A.S** this way:

- a) Contact the email: [NuvantHD@nuvantglobal.com](mailto:NuvantHD@nuvantglobal.com)
- b) Likewise, you can call the line **3788686 EXT 15170**

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#### 4.1. EXERCISE OF RIGHTS.

The power of disposition or decision that the owner has over the information that concerns him/her, necessarily implies the right to access and know if his/her personal information is being treated, as well as the scope, conditions and generalities of such treatment. In this way, **NUVANT S.A.S** guarantees the owner his right of access in three ways:

- a) The first implies that the owner can know the effective existence of the treatment to which their personal data is submitted.
- b) The second, that the owner can have access to their personal data held by the person in charge.
- c) The third, assumes the right to know the essential circumstances of the treatment, which translates into the duty of **NUVANT S.A.S** to inform the owner about the type of personal data processed and each and every one of the purposes that justify the treatment.

**NUVANT S.A.S** guarantees the right of access when, after proof of identity of the owner or personality of its representative, is made available to him/her, free of charge, the detail of personal data through electronic media that allow direct access of the holder to them.


#### 4.2. QUERIES.

**NUVANT S.A.S.** guarantees the right of consultation, providing the persons acting in exercise of this right, all the information contained in the individual record or that is linked to the identification of the owner.

For the attention of requests of consultation of personal data **NUVANT S.A.S** guarantees, that there are electronic and telephone communication means.

In any case, regardless of the mechanism implemented for the attention of requests for consultation, they will be served within a maximum term of ten (10) business days from the date of receipt. When it is not possible to attend the consultation within such term, the interested party will be informed before the expiration of the 10 days, stating the reasons for the delay and indicating the date on which the consultation will be attended, which in no case may exceed five (5) business days following the expiration of the first term.

#### 4.3. CLAIMS.

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**NUVANT S.A.S** guarantees the claim right, to the data bases for the correction, update or suppression, or when they notice the presumed breach of any of the duties contained in Law 1581 of 2012 and other applicable norms. The claim will be processed under the following rules:

If the claim received does not have complete information that allows it to process it, that is, with the identification of the owner, the description of the facts that give rise to the claim, the address and accompanying the documents you want to enforce, the interested party will be required within five (5) days after receipt to correct the faults. After two (2) months from the date of the request without the applicant submitting the required information, it shall be understood that the claim has been abandoned.

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


**4.4. IMPLEMENTATION OF PROCEDURES TO ENSURE THE RIGHT TO FILE CLAIMS.**

The request for rectification, updating or deletion must be submitted through the means provided by **NUVANT S.A.S** and this document must contain, as a minimum, the following information:

- a) The name, address of the owner and means of contact to receive the answer as telephone, email, residence address.
- b) Documents proving the identity or representation of your representative.
- c) The clear and precise description of the personal data with respect to which the holder seeks to exercise any of the rights.
- d) If necessary, other elements or documents that facilitate the location of personal data.

***Paragraph 1. Rectification and updating data.***

**NUVANT S.A.S** has the obligation to rectify and update at the request of the owner, the information of the latter that is incomplete or inaccurate, in accordance with the procedure and the terms indicated above. In this regard, the following will be taken into account:

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**NUVANT S.A.S** has full freedom to enable mechanisms that facilitate the exercise of this right.

***Paragraph 2. Deleting data.***

The owner has the right, at all times, to request **NUVANT S.A.S** the elimination (deletion) of your personal data when:

- a) Consider that they are not being treated according to the principles, duties and obligations set forth in Law 1581 of 2012.
- b) They have ceased to be necessary or pertinent for the purpose for which they were collected.
- c) The period necessary to fulfill the purposes for which they were collected has been exceeded.

This deletion implies the total or partial elimination of personal information in accordance with the request by the owner in the records, files, databases or treatments performed by **NUVANT S.A.S**, it is important to take into account that the right of cancellation is not absolute and the person in charge can deny the exercise of the same when:

- a) The request to suppress the information will not proceed when the holder has a legal or contractual duty to remain in the database.
- b) The elimination of data hinder judicial or administrative actions linked 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 owner; to perform an action based on the public interest, or to comply with an obligation legally acquired by the owner.


In case of cancellation of personal data, **NUVANT S.A.S.** must perform the deletion operatively in such a way that the elimination does not allow the retrieval of the information.

**4.5. REVOCATION OF AUTHORIZATION.**

The holders of personal data may revoke the consent to the processing of their personal data at any time, as long as it is not prevented by a legal provision.

There will be two modalities in which the revocation of consent can occur: The first, on the totality of the consented purposes, that is, that **NUVANT S.A.S.** should stop dealing with



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the owner's data completely; the second, can on certain types of treatment, such as for market studies.

For the above, it will be necessary that the owner at the time to raise the request to revoke the consent to **NUVANT S.A.S**, indicate in this if the revocation that you intend to perform is total or partial. In the partial revocation you must indicate with which treatment the owner is not satisfied.

There will be cases in which consent, due to its necessary nature in the relationship between the owner and the person responsible for the fulfillment of a contract, by legal provision can not be revoked.

## **5. DUTIES OF NUVANT S.A.S. WHEN HE ACTS AS RESPONSIBLE FOR THE PROCESSING OF PERSONAL DATA.**

All those obliged to comply with this policy must keep in mind that it is the responsibility of NUVANT S.A.S. to comply with the duties imposed by law in this regard. Therefore, they must act in such a way that they fulfill the following obligations:

### **5.1. DUTIES OF NUVANT S.A.S. REGARDING THE OWNER OF THE DATA.**

- a) Request and keep, in the conditions set forth in this policy, a copy of the respective authorization granted by the owner.
- b) Clearly and sufficiently inform the owner about the purpose of the collection and the rights that assist him by virtue of the authorization granted.
- c) Guarantee to the owner, at all times, the full and effective exercise of the right of habeas data, that is, knowing, updating or rectifying their personal data.
- d) Inform at the request of the owner about the use given to their personal data.
- e) Process inquiries and claims formulated in the terms indicated in this policy.

### **5.2. DUTIES OF NUVANT S.A.S. REGARDING THE QUALITY, SECURITY AND CONFIDENTIALITY OF PERSONAL DATA**

- a) Observe the principles of truthfulness, quality, security and confidentiality in the terms established in the Colombian legislation.
- b) Preserve the information under the necessary security conditions to prevent its adulteration, loss, consultation, use or unauthorized or fraudulent access.
- c) Update the information when necessary.
- d) Rectify personal data when appropriate.

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**5.3. DUTIES OF NUVANT S.A.S. WHEN YOU PERFORM THE TREATMENT THROUGH A MANAGER**

- a) Provide the person in charge of processing only the personal data that he is authorized to supply to third parties.
- b) Ensure that the information provided to the person in charge of processing is truthful, complete, accurate, up-to-date, verifiable and understandable.
- c) Communicate in a timely manner to the person in charge of processing all the news regarding the data that you have previously provided and adopted the other necessary measures so that the information provided is kept up-to-date.
- d) Report in a timely manner to the person in charge of processing the rectifications made on personal data so that the latter may proceed to make the appropriate adjustments.
- e) To demand from the person in charge of the treatment, at all times, respect for the security and privacy conditions of the holder's information.
- f) Inform the person in charge of the treatment when certain information is under discussion by the owner, once the claim has been filed and the respective procedure has not been completed.


**5.4. DUTIES OF NUVANT S.A.S. REGARDING THE SUPERINTENDENCE OF INDUSTRY AND COMMERCE**

- a) Inform you of possible violations of the security codes and the existence of risks in the management of the information of the owners.
- b) Comply with the instructions and requirements issued by the Superintendence of Industry and Commerce.

**5.5. DUTIES OF NUVANT S.A.S. WHEN HE WORKS AS THE PERSON IN CHARGE OF PROCESSING PERSONAL DATA.**

If NUVANT S.A.S. perform data processing on behalf of another entity or organization (Responsible for processing) must comply with the following duties:

- a) Establish that the person responsible for the treatment is authorized to supply NUVANT S.A.S. the personal data that will be treated as Manager.
- b) Guarantee to the owner, at all times, the full and effective exercise of the right of habeas data.
- c) Preserve the information under the necessary security conditions to prevent its adulteration, loss, consultation, use or unauthorized or fraudulent access. . Those in charge must comply with the minimum security conditions defined in the

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National Registry of Databases which can be consulted at:  
<https://www.sic.gov.co/>

- d) Update the information reported by the Responsible for the treatment within five (5) business days counted from its receipt.
- e) Process the queries and claims made by the holders in the terms indicated in this policy.
- f) Refrain from circulating information that is being contested by the owner and whose blockade has been ordered by the Superintendence of Industry and Commerce.
- g) Allow access to information only to persons authorized by the owner or authorized by law for such effect.
- h) Inform the Superintendence of Industry and Commerce when there are violations of the security codes and there are risks in the administration of the information of the owners.
- i) Comply with the instructions and requirements issued by the Superintendence of Industry and Commerce.

## 6. IMAGE TREATMENT THROUGH THE VIDEO SURVEILLANCE SYSTEM

NUVANT S.A.S: has a video surveillance system with 24-hour monitoring, where people will be recorded by security cameras at the various points located inside and outside the facilities, except for the areas where the treatment of these data may affect the image or the private and intimate life of people.

NUVANT S.A.S. in line with the procedures related to the collection, maintenance, use, deletion or final disposal of personal data and the attention of requests, queries and claims submitted by the owners, among others, described in this Treatment Policy of Data; the following rules are kept in mind:

- a) Through informative signaling, knowledge of this treatment is provided to the owner of the data.
- b) The images and sounds captured by the video surveillance cameras will be used for the safety of the employee and the people who visit us, these being evidence before the appropriate authorities.
- c) Keep the images only for the time strictly necessary to fulfill the purpose of the video surveillance system

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- d) Sign confidential clauses with the personnel who will access the video surveillance systems.

## **7. NATIONAL REGISTRY OF DATABASE**

In accordance with article 25 of Law 1581 and its regulatory decrees, NUVANT S.A.S. will register its databases together with this Personal Data treatment policy, in the National Database Registry administered by the Superintendency of Industry and Commerce, in accordance with the procedure established for this purpose.

## **8. TRANSFER AND TRANSMISSION OF PERSONAL DATA**

NUVANT S.A.S. may transfer and transmit personal data to third parties with whom it has an operating relationship that provide the services necessary for its proper operation, or in accordance with the functions established by law. In such cases, the necessary measures will be adopted so that the people who have access to their personal data comply with this Policy and with the principles of personal data protection and obligations established in the Law. In any case, when NUVANT transmits the data to one or more managers located within or outside the territory of the Republic of Colombia, will establish contractual clauses or will enter into a contract for the transmission of personal data in which it will indicate:

- a) Scope of the treatment,
- b) The activities that the person in charge will carry out on behalf of the person responsible for the processing of personal data and,
- c) The obligations of the Person in Charge towards the owner and the person in charge.

Through this contract, the Person in Charge will undertake to apply the obligations of the person in charge under the Information Treatment policy set by him / her and to carry out the Data Processing in accordance with the purpose that the Holders have authorized and with the applicable laws in force. . In addition to the obligations imposed by applicable rules within the aforementioned contract, the following obligations must be included in charge of the respective manager:

- a) Give Treatment, on behalf of the person in charge, to personal data in accordance with the principles that govern them.
- b) Safeguard the security of the databases in which personal data is contained.

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- c) Keep confidentiality regarding the processing of personal data. PERSONAL DATA PROCESSING POLICIES Page 13 of 26 In case of transfer, the obligations stipulated in Law 1581 of 2012 and regulatory standards will be complied with.

## 9. PRIVACY NOTICE.

**NUVANT S.A.S** through this notice, informs holders of personal data found in their databases, that the policies for the processing of personal data are established in accordance with Law 1581 of 2012 on Data Protection and with the Regulatory Decree 1377 of 2013 and all those rules that complement, replace or modify it.

As the owner of the information you have the right to know, update and rectify your personal data and, only in the cases where it is appropriate, to suppress them or revoke the authorization granted for their treatment.

The data requested by **NUVANT S.A.S** is intended for administrative and commercial management of the organization and the dispatch of commercial communications about our products.

If you require more information, to know our personal data processing policy and the substantial changes that occur in it or if you wish to file a complaint, claim or request for information related to the protection of personal data, please contact the following email: [NuvantHD@nuvantglobal.com](mailto:NuvantHD@nuvantglobal.com).

## 10. PROCEDURE FOR MANAGING EVENTS WITH PERSONAL DATA.

Incidence or event is understood to be any anomaly that affects or could affect the security of the databases or information contained therein; In case of knowing any incident that has occurred, the user must notify it to the Data Protection Officer who will take the appropriate measures against the reported incident.

The Personal Data Protection Officer will report the incident to the Personal Data Protection Delegation of THE SUPERINTENDENCY OF INDUSTRY AND COMMERCE, in the module enabled for this purpose within 15 days from the knowledge of this.

## 11. PROCEDURE FOR COMPLAINTS BEFORE THE SUPERINTENDENCE OF INDUSTRY AND COMMERCE

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The Holder or successor in title may only file a complaint with the Superintendency of Industry and Commerce once they have depleted the consultation or claim process before NUVANT S.A.S, according to the aforementioned procedure.

## **12. MODIFICATION AND / OR UPDATING OF THE DATA PROTECTION AND INFORMATION MANAGEMENT POLICY**

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: email [NuvantHD@nuvantglobal.com](mailto:NuvantHD@nuvantglobal.com) public page of Nuvant Global. For holders who do not have access to electronic media or those who can not be reached, can be contacted at: 3788686 EXT-15170

Communications will be sent at least ten (10) before implementing the new policies and / or substantial update thereof.


## **13. VALIDITY OF PERSONAL INFORMATION TREATMENT POLICIES.**

These policies apply from October 1, 2016, until there is a substantial change that leads to restructuring the entire policy.

As a rule, the term of authorizations on the use of personal data by customers and / or users is understood as the term of the commercial relationship or the connection to the service, during the exercise of the company's corporate purpose and the times established by law for the maintenance of information in the database.

The authorizations on the data of the clients and / or users will be able to finish by their will at any time. If the person is an active client of **NUVANT S.A.S** If the person is an active client of **NUVANT S.A.S** your data can not be used for anything other than the provision of the product or service and for the offer of subsequent renewals when the service has this modality.

When the terms of the privacy policies and use of personal information of any of the services or products contracted by a holder, change in the essential, as a general rule, in the services that have the option of renewal will obtain in this the new authorization. For all other cases, authorization will be obtained in the manner established for each privacy policy or notice or through the usual means of contact between the company and the owners.

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Best regards.

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MONICA MARIA COSSIO ALVAREZ  
SUBSTITUTE LEGAL REPRESENTATIVE