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**MANUAL OF DATA PROTECTION POLICIES AND PROCEDURES
PERSONAL**

 Business	 Business	 Business
Name: Jairo A Quiroga T Cargo: Quality Systems and Assurance Administrator	Name: Ricardo Oviedo Cargo: Chief Operating Officer	Name: Daniel Cardoso Position: CEO
Elaborated	Revised	approved

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1. MARCO GENERAL

1.1 Objective of the manual

The Company, in compliance with the provisions of the Political Constitution of Colombia and the Law 1581 of 2012 and its regulatory and complementary standards, guarantees comprehensive protection and exercise of the fundamental right of Habeas Data of all holders of personal information, for which it is responsible or in charge of processing, and will also guarantee at all times the fundamental rights to privacy, good name and privacy of natural persons, which is why it adopts and applies this Manual of Data Protection Policies and Procedures Personal.

Therefore, this Manual allows you to know each of the internal and external members of the Company the rights and obligations that Law 1581 of 2012 and the regulations complementary have developed, guaranteed and established in favor of the holders of the personal information.

1.2 Scope of the manual.


Facilitate the process of implementing compliance with the provisions of the Political Constitution of Colombia and Law 1581 of 2012 and its regulatory norms and complementary, comprehensively guarantees the protection and exercise of the fundamental right of Habeas Data of all holders of personal information.

And the responsibilities of each member of the company and senior management in the management of information.

This manual applies to all workers who work in person, work at home; contractors and visitors of the company BLOOM 4 ALL SAS., in all work centers and activities of the company.

NOTICE OF PRIVACY

The Company informs all interested parties that in compliance with our Personal Data Protection Policy, the personal data that we obtain and store by virtue of the operations that you request or celebrate with the company will be treated in accordance with the principles and duties defined in Law 1581 of 2012 and other regulations that deal with and regulate this matter, always in order to promote the improvement of the company in terms of technology, efficiency and agility in the provision of its services and those specific to the activity that it are developed in compliance with our objectives.

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Likewise, this website uses a service that collects information, including the user's IP address, which will be transmitted, processed and stored in accordance with the terms established by law. Including the possible transmission of said information to third parties for reasons of legal requirement or when said third parties process the information through a navigation engine.

The User expressly accepts, by using this Site, the processing of the information obtained in the manner and for the purposes mentioned above. And you also know the possibility of rejecting the processing of such data or information by rejecting the use of Cookies through the configuration of your browser. Although this option to block Cookies in your browser may not allow you to fully use all the functionalities of this website.

You can allow, block or delete cookies installed on your computer by configuring the options of the browser installed on your computer.

2. GENERALITIES

2.1 Presentation of the COMPANY.

2.2. Aim.


The Company, in compliance with the provisions of the Political Constitution of Colombia and the Law 1581 of 2012 and its regulatory and complementary standards, guarantees comprehensive protection and exercise of the fundamental right of Habeas Data of all holders of personal information, for which it is responsible or in charge of processing, and will also guarantee at all times the fundamental rights to privacy, good name and privacy of natural persons, which is why it adopts and applies this Manual of Data Protection Policies and Procedures Personal.

2.3 Organizational structure

Company data

Bloom's purpose is to be a company that can carry out computer systems development activities (planning, analysis, design, programming, testing), computer consulting and computer facilities management activities.

Name:	Bloom 4 ALL S.A.S
Night:	901413345-7
Address:	Cra 8a 153 51 TO 9 OF 803
Telephone:	(601) 6455809

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2.3.1 Regulations

For the correct implementation of Law 1581 of 2012 and its Regulatory Standards and complementary, comprehensively guarantees the protection and exercise of the fundamental right of Habeas Data in Colombia of all holders of personal information, for which it is responsible or in charge of processing, and will also guarantee at all times the rights fundamental to the intimacy, good name and privacy of people, taking into account current regulations.

It recognizes and protects the right that all people have to know, update and rectify the information that has been collected about them in databases or files that are susceptible to processing by entities of a public or private nature.

This law will apply to the processing of personal data carried out in Colombian territory or when Colombian legislation is applicable to the person responsible for the Treatment or Processor not established in national territory by virtue of international standards and treaties.

Criminal sanctions exist in Law 1581 of 2012 with:


a) Personal and institutional fines of up to the equivalent of two thousand (2,000) legal monthly minimum wages in force at the time of imposition of the sanction.

The company is obliged to comply with data protection law. All natural or legal persons, as well as private or public entities that use personal data of third parties in the development of their business or professional activity, are required to comply with the Data Protection Law.

It must be taken into account that the processing of sensitive data is prohibited by rule. In general, Law 1581 of 2012 prohibits the processing of sensitive data, except when: The Owner has given explicit authorization to said treatment, except in cases where the granting of said authorization is not required by law.

The treatment is necessary to safeguard the vital interest of the Owner and the Owner is physically or legally incapacitated. In these events, legal representatives must grant their authorization.

The processing is carried out in the course of legitimate activities and with due guarantees by a foundation, NGO, association or any other non-profit organization, whose purpose is political, philosophical, religious or union, provided that they refer exclusively to its members or to people who maintain regular contacts due to their purpose. In these events, the data cannot be provided to third parties without the authorization of the Owner.

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The processing refers to data that is necessary for the recognition, exercise or defense of a right in a judicial process.

The treatment has a historical, statistical or scientific purpose. In this event, measures must be adopted leading to the deletion of the identity of the Holders.

The data can only be used when there is authorization from the owner, which is the prior, express and informed consent of the Owner to carry out the processing of personal data, which must be obtained by any means that can be subject to subsequent consultation.

The person responsible for the treatment must adopt procedures to request, no later than at the time of collection of your data, the authorization of the Owner for the Treatment of the same and inform you of the personal data that will be collected, as well as all the specific purposes of the treatment. for which consent is obtained.

It will be understood that the authorization meets these requirements when it is expressed in writing, orally or through unequivocal conduct of the Owner that allows it to be reasonably concluded that the authorization was granted.


It should be taken into account When the authorization of the owner is not necessary when it comes to: Information required by a public or administrative entity in the exercise of its legal functions or by court order. Public data. Medical or health emergency cases. Processing of information authorized by law for historical, statistical or scientific purposes. Data related to the Civil Registry of people. The conditions have authorization for the processing of sensitive data.

No type of activity that involves the collection of personal data and the provision of information may be conditional on the Owner providing sensitive personal data. However, when such treatment is possible in accordance with the provisions of article 6 of Law 1581 of 2012, the following obligations must be met: Inform the Owner that since it is sensitive data, he is not obliged to authorize its treatment.

Inform the Owner explicitly and in advance, in addition to the general requirements of the authorization for the collection of any type of personal data, which of the data that will be processed are sensitive and the purpose of the processing, as well as obtaining your express consent.

3. DEFINITIONS

Privacy notice: Verbal or written communication generated by the person responsible, addressed to the owner for the processing of their personal data, through which they are informed about the existence of the information processing policies that will be applicable to them, the

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way of accessing them and the purposes of the treatment that is intended to be given to the personal information.

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

Database: Organized set of personal data that is subject to Treatment.

Personal data: Any information linked or that can be associated with one or more determined or determinable natural persons¹. "Personal data" must then be understood as information related to a natural person (person individually considered).

Public data: It is data that is not semi-private, private or sensitive. Public data are considered, among others, data relating to the marital status of people, their profession or trade, and their status as a merchant or public servant. Due to its nature, public data may be contained, among others, in public records, public documents, official gazettes and bulletins, and duly executed judicial rulings that are not subject to confidentiality. It will also be understood that all data contained in public records will have this same nature.

Public personal data: All personal information that is freely and openly known to the general public.


Private personal data: All personal information that has restricted knowledge, and in principle private to the general public.

Sensitive data: Data that affects 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 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, a sexual life and biometric data².

¹⁻² Act 1581 of 2012, Article 3° literal c). Article. 5 law 1581/1

Private data: Data that is only relevant to its owner (e.g. photographs, videos, data related to your lifestyle.) Sensitive data: Special category of Personal data. Those that affect people's privacy or whose improper use can generate discrimination.

Data Processor: The Company acts as data processor personal in cases, which by itself or in association with others, carries out the treatment of personal data on behalf of a data controller.

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Responsible for the treatment: The Company acts as responsible for the treatment of personal data against all personal data about which you decide directly, in compliance with their legally recognized functions.

Owner: Natural person whose personal data is the subject of Treatment:

By the Owner, who must prove his/her identity sufficiently by different means made available by the person responsible. For his successors, who must prove such quality.

By the representative and/or attorney of the Owner, prior accreditation of the representation or empowerment. By stipulation in favor of another or for another.

Transfer: The transfer of data takes place when the person responsible and/or in charge of processing personal data, located in Colombia, sends the information or data personal data to a recipient, who in turn is responsible for the treatment and is located inside or outside the country.

Transmission: Processing of personal data that involves their communication inside or outside the territory of the Republic of Colombia when its purpose is the carrying out a treatment by the person in charge on behalf of the person responsible.

Treatment: Any operation or set of operations that the Company carries out on personal data such as collection, processing, advertising, storage, use, circulation or deletion. The above will only apply exclusively to natural persons.


Data protection officer: This is the person within the Company, who is responsible for function is the surveillance and control of the application of the Personal Data Protection Policy, under the guidance and guidelines of the Information Security Committee.

4. PRINCIPLES FOR THE PROCESSING OF PERSONAL DATA

To comply with the Personal Data Protection Policy, as well as the obligations imposed by Law 1581 of 2012 and its regulatory Decree, the following must be taken into account.

The handling and processing of personal, sensitive and minor data, within the Company is framed under the following principles:

Access and Circulation: The data processed by the Company is intended to fulfill its functions of representation and association, therefore, its access will be guaranteed, in accordance with the provisions of the Law. Therefore, its circulation and access will be restricted.

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in accordance with the nature of the data and with the authorizations given by the Owner or others persons provided for in the Law.

Confidentiality: Taking into account the previous definition, the confidentiality of the data depending on its nature. Therefore, reservation will be kept information during and after the completion of the activities that justify the processing of personal data.

Purpose: Legitimate, informed, temporary and material. The purpose corresponds to the functions legally granted to the Company. Likewise, the Company will process personal data when required for the development of its private, union and representative functions.

Legality: Legitimate purposes and subject to Law 1581 of 2012 and its regulatory decrees.

Freedom: The Company guarantees the right to informational self-determination of the owners that provide personal data.

Security: Technical, human and administrative measures necessary to avoid adulteration, loss, unauthorized or fraudulent consultation, use or access to personal information processed by the Confederation.


Transparency: The Company guarantees the owners of personal data the right to access and knowledge of personal information that is being processed in accordance with the provisions of Regulatory Decree 1377 of 2013.

Veracity or Quality: Information that is true, complete, accurate, updated, verifiable and understandable.

4.1 Principle of restricted access and circulation

The processing is subject to the limits derived from the nature of the personal data, of the provisions of this Manual, the Law and the Constitution. In this sense, the Treatment can only be done by people authorized by the Owner and/or by people provided by law.

Personal data, except those of a public nature, may not be available on the Internet or other means of dissemination or mass communication, unless access is technically controllable to provide restricted knowledge to the Owners or third parties authorized. For these purposes, the Company's obligation will be one of means and not of result.

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4.2 Principle of confidentiality.

All persons involved in the processing of personal data, which are not private in nature, are obliged to guarantee the confidentiality of the information, including after the end of your relationship with any of the tasks included in the treatment, being able to only provide or communicate personal data when it corresponds to the development of activities authorized by law and statutes.

Consequently, the Company undertakes to conserve and maintain in a manner strictly confidential and not reveal to third parties, personal, accounting, technical, commercial or any other type of information that they know in the exercise of their duties.

All people who currently work or are linked in the future for this purpose, in the administration and management of databases, must sign an additional document or other document to their employment contract or provision of services for the purposes of ensuring such commitment.

This obligation persists and is maintained even after its relationship with any of the tasks included in the Treatment has ended.

4.2.1 Purpose principle

The processing of personal data that the Company carries out obeys the legitimate purpose in accordance with the Political Constitution, Law 1581 of 2012 and Decree 1377 of 2013, as well as with the provisions of the Colombian Commercial Code.


4.2.2 Principle of legality

The Processing of Personal Data is a regulated activity that is governed by Statutory Law 1581 of 2012, Decree 1377 of 2013 and other regulations that the complement, modify or repeal.

4.2.3 Principle of freedom

The Company may process and transfer personal data that is stored in its databases, without the prior consent of the owner, as long as these come from the public records of the Chambers of Commerce that it unites and represents, or that, although they are not contained in them, are of a public nature or are found in databases excluded by the Law (e.g. journalistic, statistical and research).

In other cases, the Company will obtain the prior, express and informed consent of the Owner when processing their personal data.

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4.2.4. Safety principle

The Company, as responsible and/or in charge of processing personal data, provides the technical, human and administrative measures that are necessary to provide security to personal information, avoiding its adulteration, loss, consultation, unauthorized use or access. or fraudulent.

4.2.5. Transparency principle

The Company guarantees to natural persons holders of personal data that they may obtain at any time, free of charge and without restrictions, information about the existence of data that concerns you and that is stored in the Company's databases, under the parameters established in article 21 of the Regulatory Decree 1377 of 2013. This principle will not be applicable to public registry databases, nor to those that are outside the scope of application of Law 1581 of 2012 in accordance with article 2 of the aforementioned Law.

4.2.6 Principle of truthfulness or quality

The Company guarantees that the information contained in databases other than those coming from public records, which are subject to processing; They will be true, complete, accurate, up-to-date, verifiable and understandable. The veracity and quality of the personal data will be subject to what is reported by each of its owners. The Company is exempted from any type of responsibility regarding its quality.


4.3. Leadership and commitment

Senior Management has the responsibility of complying with the provisions of Law 1581 of 2012 and its Regulatory and complementary standards, comprehensively guaranteeing the protection and exercise of the fundamental right of Habeas Data in Colombia

5. INFORMATION PROCESSING POLICIES

NOTICE OF PRIVACY

The Company informs all interested parties that, in compliance with our Personal Data Protection Policy, the personal data that we obtain and store by virtue of the operations that you request or celebrate with the company will be treated in accordance with the principles and duties defined in Law 1581 of 2012 and other regulations that deal with and regulate this matter, always in order to promote the improvement of the company in terms of technology, efficiency and agility in the provision

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of its services and those specific to the activity that are developed in compliance with our objectives.

5.1 General information on authorization

The Company will previously request authorization for the processing of personal data by any means that allows it to be used as evidence.

In the case of private personal data corresponding to persons natural, the description of the purpose of data processing will be reported through the same specific document or attachment. The Company will inform the owner of the data following:

- The processing to which your personal data will be subjected and the specific purpose of the same.
- The time for which your personal data will be processed.
- The rights that assist you as the owner.
- The website, email, physical address and other communication channels for which you can make queries and/or complaints to the person responsible or in charge of the treatment.

5.2 Right of access


The Company guarantees the right of access in accordance with Law 1581 of 2012, only to the Holders of private personal data that correspond to natural persons, prior accreditation of the identity of the owner, legitimacy, or personality of his representative, making available to the latter, without cost or disbursement, in a detailed and detailed, the respective personal data processed, through any means of communication, including electronic ones that allow direct access by the owner. Saying Access is subject to the limits established in article 21 of Regulatory Decree 1377 of 2013.

5.3 Right to consultation

The owners of the personal data may consult the personal information that resides in any of the Company's databases. Consequently, The Company guarantees the right of consultation in accordance with the provisions of Law 1581 of 2012 exclusively on private, sensitive and minor personal data corresponding to natural persons, providing the Holders of these personal data with the information contained in each one. of the corresponding databases

and that are under the control of the Company.

The Company will establish authentication measures that allow the identification secure to the owner of the personal data who makes the query or request. This obligation

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It does not apply to public records databases managed as commissioned by The Company.

With respect to responding to requests for personal data consultation, the Company guarantees:

- Enable electronic or other means of communication that you consider relevant and safe;
- Establish forms, systems and other methods that will be reported in the Notice Of privacy;
- Use the customer service or complaints services provided. find in operation.

Regardless of the mechanism implemented to attend to requests for query, these will be processed within a maximum term of ten (10) business days from the date of receipt. In the event that a consultation request cannot be attended to within the aforementioned period, the interested party will be informed before the expiration of the period of the reasons why their query has not been answered, the which in no case may exceed five (5) business days following the expiration of the foreground.

5.4 The right to claim


The Owner of private personal data that corresponds to a natural person and considers that the information contained or stored in a database may be subject to correction, updating or deletion, or when they notice the alleged breach of any of the duties and principles contained in the regulations on the Protection of Data.

Personal information. In this sense, they may file a claim with the person responsible or in charge of processing the Company.

The Company has the necessary authentication measures that allow the holder of the personal data making the claim to be securely identified. The claim may be presented by the owner, taking into account the information indicated in article 15 of the Law 1581 of 2012.

If the claim is incomplete, the owner may complete it within five (5) days. business hours following receipt of the claim, to correct any flaws or errors. After two (2) months from the date of the request, without the applicant presenting the requested information, it will be understood that the claim has been abandoned.

If a claim is received that is not the responsibility of the Company, it will be transferred to whoever corresponds to resolve it within a maximum period of two (2) business days and will inform of the situation to the interested party.

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Once the Company has received the complete claim, a legend that says "claim in process" and the reason for this, within a period of no more than two (2) business days. This legend will remain until the claim is decided. The term maximum to resolve the claim is fifteen (15) business days, counted from the day following the date of receipt. When it is not possible to address the claim within said term, the Company will inform the interested party of the reasons for the delay and the date on which their claim will be addressed, which in no case may exceed eight (8) business days following the expiration of the first term.

5.5 The right to rectification and updating of data.

The Company undertakes to rectify and update, at the request of the Owner, the information of a personnel that corresponds to natural persons, that is incomplete or inaccurate, of in accordance with the procedure and terms indicated above. In this regard, The Company will take into account the following:

In requests for rectification and updating of personal data, the Owner must indicate the corrections to be made and provide the documentation that supports your request.

The Company has complete freedom to enable mechanisms that facilitate the exercise of this right, as long as they benefit the Owner of the personal data. Consequently, electronic or other means that the Company considers relevant and may be enabled. insurance.

The Company may establish forms, formats, systems and other methods, which will be informed in the Privacy Notice and which will be made available to those interested in the website or offices of the Company.


5.6 Right to deletion of data.

The Owner of personal data has the right at all times to request from The Company, the deletion (elimination) of your personal data, as long as it is not data that has a legal or contractual obligation to remain in the Database for a specific term. For the rest of the data, the following will be taken into account assumptions:

That they are not being treated in accordance with the principles, duties and obligations provided for in current regulations on Personal Data Protection.

That they are no longer necessary or relevant for the purpose for which they were collected.

That the period necessary for the fulfillment of the purposes for which were collected.

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This deletion implies the elimination or secure deletion, total or partial, of personal information in accordance with what is requested by the owner in the records, files, databases or treatments carried out by The Company.

The right of deletion is not an absolute right, and the Company, as responsible for the processing of personal data, may deny or limit the exercise of it when:

The data owner has a legal or contractual duty to remain in the database.
The deletion of data hinders judicial or administrative actions linked to tax obligations, the investigation and prosecution of crimes or the updating of administrative sanctions.

The data is necessary to protect the legally protected interests of the owner; to carry out an action based on the public interest, or to comply with an obligation legally acquired by the owner.

The data is data of a public nature and corresponds to public records, which are intended for publicity.

5.7 The right to revoke authorization

Any owner of personal data that corresponds to natural persons may revoke consent to their processing at any time, as long as it is not prevented by a legal or contractual provision. To this end, The Company has established simple and free mechanisms that allow the owner to revoke their consent.


In cases where the revocation of the authorization is possible, it will be handled under the following two modalities:

Total: Regarding all permitted purposes, that is, the Company must completely stop processing the data of the Owner of personal data.

Partial: For certain permitted purposes, such as for advertising or market research purposes. In this case, The Company must partially suspend the processing of the owner's data. Other purposes of the processing are then maintained that the controller, in accordance with the authorization granted, can carry out and with which the owner agrees.

The right of revocation is not an absolute right and the Company, as responsible for the processing of personal data, may deny or limit the exercise of it when:

The data owner has a legal or contractual duty to remain in the database.

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The revocation of the authorization of the treatment hinders judicial proceedings or administrative tasks linked to tax obligations, the investigation and prosecution of crimes or the updating of administrative sanctions.

The data is 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.

5.8 Data protection in contracts.

In employment contracts, the Company has adopted a format annexed to the contract in order to authorize in advance and generally the processing of personal data related with the execution of the contract, which includes the authorization to collect, modify or correct, in the future, personal data of the Owner corresponding to persons natural.

It has also included the authorization so that some of the personal data, if applicable, can be delivered or transferred to third parties with whom the Company has service provision contracts, for the performance of outsourced tasks. In these formats, mention is made of this Manual and its location on the website of the company for your due consultation.


In contracts for the provision of external services, when the contractor requires data personal, The Company will provide you with said information as long as there is a prior and express authorization of the Owner of the personal data for this transfer.

Given that in these cases, third parties are Data Processors and their contracts will include clauses that specify the purposes and treatments authorized by the Company and precisely delimit the use that these third parties can give to them, as well as the obligations and duties established in Law 1581 of 2012 and the Decree Regulatory 1377 of 2013, including the necessary security measures that guarantee at all times the confidentiality, integrity and availability of the personal information commissioned for processing.

For its part, the Company, when receiving data from third parties and acting as Data Processor of personal data, verifies that the purpose, or purposes, of the treatments authorized by the owner or permitted for legal reasons,

contractual or jurisprudential are in force and that the content of the purpose is related to the reason for which said personal information is to be received from the third party, since only in this way will it be authorized to receive and process said data personal.

5.9 Transfer of personal data to third countries

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In cases where the Company is carrying out any of its functions, such as representation or participating in international programs for the development economic, cultural and social, or any other activity that involves the transfer of personal data to third countries, will be governed by the following conditions:

The transfer of personal data to third countries will only be carried out when there is corresponding authorization from the owner and prior authorization from the Delegation of Personal Data of the Superintendency of Industry and Commerce, in cases where there is room.

An international transfer is considered any treatment that involves a transmission of data outside Colombian territory, whether a transfer of data is carried out, as if its purpose was to provide a service to the person responsible outside of Colombia.

Likewise, prior authorization from the Data Protection Officer must be obtained. Personnel of the Superintendency of Industry and Commerce, when international data transfers are planned to be made to countries that do not provide a certain protection level.

The international transfer of data may be carried out at the request of the Company, establishing the purpose, the groups of interested parties or holders of the information of personal nature, the data being transferred and the documentation that incorporates the guarantees required to obtain the authorization; which includes a description of the specific security measures that will be adopted, both by the Company and by the Data Controller or Data Processor at its destination.


The Company will not request authorization when the international data transfer is covered by any of the exceptions provided for in the Law and its Decree Regulatory. An example of this is the consent of the affected party to the transfer, the transfer is necessary to establish the contractual relationship between the affected party and the responsible for the Database and the transfer refers to a monetary transaction.

5.10 General applicable rules.

The Company has established the following general rules for data protection personal, sensitive and minors, such as the care of databases, files electronic personal information:

The Company guarantees the authenticity, confidentiality and integrity of the information that be under your responsibility.

The Company's Information Security Committee is the body that executes and designs the strategy for compliance with this Manual. The Company adopted all

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necessary and possible technical measures to guarantee the protection and control of the bases of data existing and under their control.

In cases where the infrastructure depends on a third party, it will be ensured that both the availability of information as well as the care of personal, sensitive and confidential data. minors is a fundamental objective.

The Company will carry out audits and controls periodically to guarantee the correct implementation of Law 1581 of 2012 and its regulatory decrees.


It is the responsibility of the Company's officials to immediately report to the Superintendence of Industry and Commerce – Delegation of Personal Data - any information leak incident, computer damage, personal data breach, commercialization of data, use of personal data of children or adolescents, identity theft, security incidents, violation of security codes or any type of conduct that may violate a person's privacy or reach generate any type of discrimination.

The personal data of minors has special protection and therefore its processing is prohibited, except when it involves data of a public nature, in accordance with the provisions of article 7 of Law 1581 of 2012 and when said treatment meets the following parameters and requirements: That it responds to and respects the best interests of children and adolescents. That respect for their fundamental rights is ensured. Once the above requirements have been met, the legal representative of the child or adolescent will grant authorization prior to the minor's exercise of his or her right to be heard, an opinion that will be valued taking into account maturity, autonomy and ability to understand the matter. Every person responsible and in charge involved in the processing of the personal data of children and adolescents must ensure their appropriate use. For this purpose, the principles and obligations established in Law 1581 of 2012 and its regulatory decree must be applied.

The Company in its transactional portals, to guarantee the protection of information personnel, adopted all possible mechanisms to maintain confidentiality, integrity and availability of information, such as security software, digital signatures, as well as the necessary tools to safeguard and protect the company's databases. entity.

The training and qualification of officials, suppliers, contractors, will be a duty and fundamental complement to this Manual.

The Data Protection Officer must identify and promote the authorizations of the headlines, privacy notices, awareness campaigns, claim legends and other procedures to comply with Law 1581 of 2012 and Decree 1377 of 2013.

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6. PROCEDURE SO THAT THE HOLDERS OF THE INFORMATION CAN EXERCISE THE RIGHTS TO KNOW, UPDATE, RECTIFY AND DELETE INFORMATION AND REVOCATE THE AUTHORIZATION.

6.1 Any query or claim regarding the inherent rights of the owners regarding personal data must be made in writing addressed to The Company, attaching photocopy of the identity document of the interested Holder or any other document equivalent that proves its identity and ownership in accordance with Law.

6.2 The rights of access, updating, rectification, deletion and revocation of the authorization of personal data are very personal and can only be exercised by the owner. However, the Owner may act through a legal representative or attorney-in-fact when the person is in a situation of disability or minority, facts that make their personal exercise impossible, in which case it will be necessary for the legal representative or attorney-in-fact certifies such condition.

6.3 No value or fee will be required for the exercise of access rights, updating, rectification, deletion or revocation of the authorization when it comes to personal data of natural persons. (The provisions established in the article will be taken into account 21 of Regulatory Decree 1377 of 2013)

6.4 In order to facilitate the exercise of these rights, the Company makes available of the interested parties, the physical or electronic formats appropriate for this purpose.


6.5 Once the terms indicated by Law 1581 of 2012 and the other regulations that regulate or complement it have been met and exhausted, the Owner who is denied, totally or partially, the exercise of the rights of access, updating, rectification, deletion and revocation, by the Company, may inform the Authority National Protection of Personal Data (Superintendency of Industry and Commerce – Delegation of Personal Data Protection -) denial or disagreement with the right exercised.

7. PROTECTION FUNCTION OF DATA PERSONAL TO INTERIOR OF THE COMPANY

7.1 Those responsible

The person responsible for the processing of personal data is the company, which will ensure due compliance with this Manual and the other regulations that regulate the proper use of personal data, through all its employees and contractors, particularly through of the company leaders. The contact email is:

Info@bloo4all.com

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7.2.1 Duties of Managers

The Company distinguishes between internal manager and external manager. The managers Internal employees are employees of the Company, while external employees are natural or legal persons who process data that the Company provides them to carry out an assigned task (suppliers, consultants, outsourcing companies, Chambers of Commerce, among others.)

8. THE NATIONAL REGISTRY OF DATABASES

In accordance with article 25 of Law 1581 of 2012 and its regulatory decrees, the Company, as responsible for the processing of personal data, will register the databases data and this Manual of Policies and Procedures for the Protection of Personal Data, in the National Registry of Databases administered by the Superintendency of Industry and Commerce in accordance with the provisions of Decree 886 of 2014 and title V of the Sole Circular of the Superintendency of Industry and Commerce.

9.VALIDITY

This Manual is effective from the date of its publication.

Policy updates: The Company may modify the terms and conditions of this policy as part of our effort to comply with the obligations established by Law 1581 of 2012, the regulatory decrees and other regulations that complement, modify or repeal this policy, with the to reflect any changes

in our company or functions. In cases where this occurs, the new policy will be published.

9. CONTROL OF CHANGE

Version No	Date	Change Description	Numeral
01	05-02-2023	Document creation	Whole document