



## **Conexia's Personal Data Processing Policy**

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## Objectives

Establish the guidelines and responsibilities of Conexia for compliance with current legislation, regarding the processing of personal data collected by the organization.

## Scope

The guidelines described in this document apply to all collaborators, customers, contractors, suppliers or any third party. The data controllers and/or custodians will be subject to the provisions of this policy, taking advantage of the treatment measures, finalities, procedures and appropriate use of information and databases, as well as the set of mechanisms described with what their owners have in order to know, update, modify, rectify, delete or in general dispose of the data provided, and/or revoke the authorization given to Conexia, branches or their subsidiaries.

For the purposes of this policy, it will be understood that the information processed by Conexia and for this document the "personal data" will be the set of data provided by the owners when they access the goods, services, commercial platforms of the company, and that in general can be summarized as names, surnames, identification numbers, age, gender, address, country, city of residence, electronic residence, tastes, preferences, health data and in general the set of data required and collected by the information systems of each of Conexia's customers, suppliers and / or interested parties.

## Roles and responsibilities

- C-Level and PMO Manager: Review, approve and enforce this policy.
- CTO, CFO, COO and CSD: Ensure and promote compliance with this policy.
- Associates, collaborators, clients, contractors, suppliers and any interested party: Carry out their activities based on the guidelines of this policy and the defined controls, for their collection, treatment, and final disposal; in the same way they are responsible for communicating any breach of this policy.

## Policy Description

### 1.- Principles for the Processing of Personal Data.

#### - **PRINCIPLE OF LEGALITY REGARDING DATA PROCESSING:**

The processing of personal data is a regulated activity that must be subject to the provisions of the law of each country and the other provisions that develop it.

#### - **PRINCIPLE OF PURPOSE:**

The processing of personal data must obey a legitimate purpose in accordance with the law, which must be informed to the Owner.

- **PRINCIPLE OF FREEDOM:**

The processing of personal data can only be exercised with the prior, express and informed consent of the Owner. Personal data may not be obtained or disclosed without prior authorization, or in the absence of a legal or judicial mandate that relieves consent.

- **PRINCIPLE OF VERACITY OR QUALITY:**

The personal information subject to treatment must be truthful, complete, accurate, updated, verifiable and understandable, in this sense, the processing of partial, incomplete, fractional or misleading data is prohibited.

- **PRINCIPLE OF TRANSPARENCY:**

In the processing of personal data, the right of the Holder to obtain from the Data Controller or the Data Processor, at any time and without restriction, information about the existence of data concerning him must be guaranteed.

- **PRINCIPLE OF ACCESS AND RESTRICTED MOVEMENT:**

The processing of personal data is subject to the limits that derive from the nature of the same, from the provisions of law. In this sense, its treatment can only be done by the responsible parties authorized by the Owner and / or by the persons provided for by law. In this sense, personal data, except for public information, may not be available on the Internet or other means of dissemination or mass communication, unless the accessor is technically controllable to provide restricted knowledge only to the owners or authorized third parties.

- **PRINCIPLE OF SAFETY:**

The personal information subject to treatment by the Responsible for the Treatment or Person in Charge of the Treatment referred to by law, must be handled with the technical, human, and administrative measures that are necessary to grant security to the records avoiding their adulteration, loss, consultation, use or unauthorized or fraudulent access.

- **PRINCIPLE OF TRUST:**

All persons involved in the processing of personal data that do not have the nature of public are obliged to guarantee the reservation of the information, even after the end of their relationship with any of the tasks that comprise the treatment, being able to only make

provision or communication of personal data when this corresponds to the development of the activities authorized in the law and in the terms of it.

## 2.- Conexia's Personal Data Processing Policy.

The Management of Conexia assumes the following Personal Data Processing Policy, as a guideline to conduct its activities ensuring compliance with current legislation for each country and properly managing the processing of personal data contained in the Conexia Databases, in its role of:

- Person in charge when acting as a service provider to its customers.
- Responsible/Processor when it comes to data of its employees, service providers and customers.

In its role as Processor, Conexia defines the policies, guidelines, and controls for the Processing of Personal Data, with the objective of:

- Ensure compliance with applicable current legislation and voluntary regulations to which Conexia subscribes.
- Define roles and responsibilities in relation to the Processing of Personal Data.
- To process, on behalf of the Data Controller, the personal data in accordance with the principles that protect them.
- Safeguard the security of databases containing personal data, with defined security controls.
- Protect the information of personal data in relation to the principles of confidentiality, integrity and availability of personal data and access to them by unauthorized persons.
- Establish the mechanisms that allow responding to queries or claims made by data subjects within the deadlines defined by the laws of each country.

## 3.- Responsible for the processing of personal data Conexia.

The person responsible for the Processing of personal data is a natural or legal person, public or private, who by himself or in association with others, decides on the databases and / or the processing of the data contained therein.

The Person in charge and/or custodian is the one who processes the personal data on behalf of the Controller.

Conexia is responsible for the personal information obtained and used within the scope of this policy for the following sites, when it comes to data of its employees, service providers and customers.

Detail	Colombia	Argentina
<b>Company Name:</b>	<ul style="list-style-type: none"> <li>• Conexia S.A.S.</li> </ul>	<ul style="list-style-type: none"> <li>• Conexia S.A</li> </ul>
<b>Domicile:</b>	<ul style="list-style-type: none"> <li>• Carrera 9 N° 77-67 Piso 6 Of. 601 Bogotá</li> </ul>	<ul style="list-style-type: none"> <li>• Buenos Aires. Av. R. S. Peña 555. C.P.: 1035 Floor 9.</li> </ul>
<b>Telephone:</b>	<ul style="list-style-type: none"> <li>• +57 1 552 8800</li> </ul>	<ul style="list-style-type: none"> <li>• +54 11 7078-0219</li> </ul>
<b>Mail:</b>	<ul style="list-style-type: none"> <li>• administracion-col@conexia.com</li> </ul>	<ul style="list-style-type: none"> <li>• administracion-arg@conexia.com</li> </ul>

*Table: Contact Channels Responsible for Personal Data Conexia*

#### 4.- Treatment to which the data will be subjected and its purpose.

The databases generated from the personal data provided by our customers will be used for the following purposes:

1. Authentication and verification of the verification of the patient's rights.
2. Processing of authorizations of prescripciones / benefits including valorization of the same and of the co-payment.
3. Authentication and verification of the Provider to provide service.
4. Consultation and traceability of performance history.
5. Electronic payment of co-payments.
6. Responses to requests for improvement, petitions, complaints and claims.
7. Campaigns to comply with current regulations.
8. Information on campaigns and special programs (Health promotion and disease prevention programs).
9. Analysis of the general and individual population risk of patients.
10. Analysis of health expenditure.

11. Satisfaction surveys of the services and attention provided.
12. Update of data and identification documents.

The databases generated from the personal data provided by our employees, service providers and customers will be used in the following activities:

1. Sending information about news in products of the company and / or the industry.
2. Inform about advertising, informative or promotional campaigns.
3. Evaluate the quality of our products and the level of satisfaction as customers.
4. Transmit and/or transfer personal data to its parent company, affiliates or subsidiaries or allied third parties linked to business relations with the company nationally or internationally.
5. All those activities that are in accordance with the purpose of the company.

These activities may be carried out through physical mail, electronic mail, text messages via cell phone or by any other technological means of communication.

The acceptance of this Policy of Treatment of personal data by its Holders, entails the authorization to carry out the treatment of the same, partially, or totally, including the collection, storage, recording, use, circulation, processing, deletion, transmission and / or transfer to third countries of the data provided, for the execution of the activities related to the business.

## 5.- Rights of the owner of personal data

In all cases the Holders have the following rights:

- a) Know, update, and rectify your personal data in front of Conexia in its capacity as Responsible or In Charge.

This right may be exercised, among others, for partial, inaccurate, incomplete, fractional, misleading personal data or those whose treatment is expressly prohibited or has not been authorized.

- b) Allow the title of the application to be informed if Conexia has personal data in the databases, where it obtained them, what is the purpose.

- c) Submit requests to the Company or the Processor regarding the use you have given to your personal data, and that they provide you with such information.

- d) File complaints for violations of the law, complaints with the entities that regulate this regulation, in Colombia before the Superintendence of Industry and Commerce, and in Argentina, before the National Directorate of Personal Data Protection, following the indications given by these entities.

e) Right to revoke your authorization and / or request the updating and / or deletion of your personal data from the Conexia Databases, except in cases where the owner has a legal or contractual duty to remain in the database of the Responsible or Processor.

f) Request access to your Personal Data that have been subject to Treatment.

To validate the identity of the Holders, they may exercise their rights of Law and carry out the procedures established in this Policy by presenting their citizenship card or original identification document.

Minors may exercise their rights personally or through their parents or the adults they holdin parental authority, who must prove it through the relevant documentation.

Likewise, the rights of the Holder may be exercised by the successors in title who accredit this quality, the representative and / or proxy of the holder with the corresponding accreditation and those who have made a stipulation in favor of another or for another.

## 6.- Aresponsible area for the attention of queries and / or claims.

- The internal responsible in Conexia for the processing of personal data will be the Administration and Finance process, which you can contact by telephone and / or by email Administración Colombia <administracion-col@conexia.com>, or approach and / or send your request to the addresses indicated in the table above "Table: "Contact Channels Responsible for Personal Data Conexia".

## 7.- Procedure for the exercise of rights bythe owners.

Whoever, being the owner of the rights referred to in the previous paragraph, requires to submit a consultation, claim or decide to revoke, modify, or in general dispose of them under any modality of those previously indicated or inaccordance with the law, must observe the following general application procedures before Conexia, so that it proceeds to the pertinent.

Contact area for the attention of requests, queries and claims. The area in charge of the attention is theadministration and finance process with whom they must contact for the attention of requests, queries and claims of the holders within Conexia, in order to update, modify, rectify, delete or revoke any of their data, in accordance with the contact channels indicated in the table "Table: Contact Channels Responsible for Personal Data Conexia".

- The procedure can be initiated by the Holder, his successors in title, his representatives and / or attorneys, those who by stipulation to favor of another or for another are legitimated, or the representatives of minors.
- To process the query or claim, the Owner must provide the following information:



- Full names and surnames.
  - Identification (C.C., C.E., NIT).
  - Address.
  - Citizenship.
  - Landline / Cell Phone./ Email. (Confirm user identity)
  - Special or general powers as the case may be.
  - Advertisement.
- In the case of claims, the description of the facts giving rise to the claim must be added.

### 7.1. Consultations

- The person responsible for attending the query will verify:
  - The identity of the Holder of the Personal Data or its representative. To do this, it will require the citizenship card or original identification document of the Holder, and the special or general powers as the case may be.
- The person responsible for attending it will collect all the information about the Holder that is contained in the individual registration of that person or that is linked to the identification of the Holder within the Company's Databases.
- The person responsible for attending the query will respond to the request as long as the latter has the right to do so because he is the Owner of the Personal Data, his successor in title, his representative and / or proxy, those who by stipulation in favor of another or for another are legitimated, or the legal responsible in the case of minors. This response will be sent within ten (10) business days from the date the request was received by the Company for Colombia and five (5) business days for Argentina.

### 7.2. Claims

- The person responsible for attending to the claim will verify:
  - The identity of the Holder of the Personal Data or its representative. To do this, it will require the citizenship card or original identification document of the Holder, and the special or general powers as the case may be.
- If the reclamo is incomplete, the times indicated by law will be taken to correct and/or complete the data provided.

## 8.- Responsibilities of the person in charge of the processing of the data.

- Guarantee the Owner, always, the full and effective exercise of the rights associated with the personal data protection laws of Colombia and Argentina.
- Keep the information under the necessary security conditions to prevent its adulteration, loss, consultation, use or unauthorized or fraudulent access.
- Carry out the timely updating, rectification or deletion of the data.
- Update the information reported to the Data Controllers within the days indicated by law.
- Process the queries and claims formulated by the Holders in the terms indicated in the Law.
- Adopt an internal manual of policies and procedures to ensure adequate compliance with Law 1581 of 2012 for Colombia and Law 25326 for Argentina and for the attention of queries and claims by the holders.
- Refrain from circulating information that is being disputed by the Owner and whose blocking has been ordered by the entities that regulate them.
- Allow access to information only to those who can access it.
- Inform the corresponding entities, when there are violations of the security codes and there are risks in the administration of the information of the Holders.

## 9.- Validity.

- This policy is effective as of 01/08/2019.
- The personal data that are stored, used or transmitted will be kept in the Company's database, for as long as necessary for the purposes mentioned in this Policy or so that Conexia can fulfill its legal duties in the development of its corporate and operational purpose, in accordance with the security controls established for the protection of data.
- The validity of the database is closely related to the purposes for which the personal data were collected.

### Change history

Revision	Date	Prepared by:	Reviewed by:	Approved by:	Description
9.00	16-03-22	Jose David Rios / Juan M. Reyes	Mariluz Cano	Santiago Bridge Yesica Ciliberto placeholder image	-The policy is adjusted in accordance with the legislation of Argentina law 25326 and those responsible are adjusted.
8.00	16-02-21	Jose David Rios / Juan M. Reyes	Mariluz Cano	Santiago Bridge	-The name of Mauricio Chaparro is adjusted, the responsibilities of the person in charge of the treatment and some terms of the document are included.
7.00	21-08-19	Mauricio Chaparro / Donal Urrego	Eliana Diaz	Santiago Bridge	-Information is supplemented and contact information and validity is updated.