

# Internal manual of policies and procedures for the treatment and protection of personal data (Law 1581 of 2012) of ARQUITECTURA Y CONCRETO S.A.S.

## Internal manual

This document is structured to be an easy guide to guarantee the constitutional right that all people have to know, update and rectify the information that they collect or have collected ARQUITECTURA Y CONCRETO S.A.S., its subsidiaries and partners based on data, as well as the other rights, freedoms and constitutional guarantees referred to in the article 15 of the Political Constitution and the right to information enshrined in the article 20 of the same, and mostly, for the attention of queries and claims against to the right of computer self-determination of people. Thus, the one indicated below is The Internal Manual of policies and procedures for the treatment and protection of personal data of ARQUITECTURA Y CONCRETO S.A.S., of its subsidiaries and partners, in accordance with Statutory Law 1581 of 2012, Decree 1377 of 2013 and Decree 886 of 2014. Definitions: For this internal manual of policies and procedures for the treatment and protection of personal data, and under the terms of the law, the following definitions must be taken into account:

**Authorization:** Prior, express, and informed consent of the Holder to carry out the Processing of personal data;

**Database:** Organized set of personal data that is subject to treatment;

**Consultation:** Request for information on the personal data contained in a database, which is formulated by the owner of the same or the person authorized to do so;

**Personal data:** Any information linked to or that may be associated with one or more specific or determinable natural persons;

**Responsible for the Treatment:** Natural or legal person, public or private, that by itself or in association with others, performs the treatment of personal data on behalf of the Data Controller;

**Privacy or data protection officer:** The person who, within ARQUITECTURA Y CONCRETO S.A.S., its subsidiaries or partners, has the responsibilities of coordinating, promoting, and supervising compliance with the regulations on personal data protection.

**Claim:** Request or demand made by the owner of personal data or the person authorized to do so around the personal data included in a database.

**Responsible for the Treatment:** Natural or legal person, public or private, that by itself or in association with others, decides on the database or the Treatment of the data; Owner: Natural person whose personal data is subject to treatment;

**Treatment:** Any operation or set of functions on personal data, such as collecting, storage, use, circulation, or deletion

## Rights of the holders of information processed by ARQUITECTURA Y CONCRETO S.A.S., by its subsidiaries and partners

ARQUITECTURA Y CONCRETO S.A.S, its subsidiaries, and partners, under the terms of the law, guarantee the owner of the personal data it deals with the following rights:

- a) Know, update, and rectify your data. This right may be exercised, among others, against partial, inaccurate, incomplete, fractioned, misleading data, or those whose treatment is expressly prohibited or has not been authorized;
- b) Request proof of the authorization granted to ARQUITECTURA Y CONCRETO S.A.S., its subsidia-

- ries or partners except when it is excepted as a requirement for the treatment in terms of the law;
- c) Be informed by ARQUITECTURA Y CONCRETO S.A.S., its subsidiaries, partners, or the Treatment Manager, upon request, regarding the use that has been given to your data;
  - d) Present before the Superintendence of Industry and Commerce complaints for infractions to protect and treat personal information.
  - e) Revoke the authorization and request the deletion of the data when the principles, rights, and constitutional and legal guarantees are not respected in the treatment.
  - f) Free access to your data that has been subject to treatment. Responsible for the Processing of personal information The person responsible for the processing of personal data is:

Company name: ARQUITECTURA Y CONCRETO S A.S • NIT: 800093117-3 • ISIC 4111,4112,4290,4210

Address: Medellín, Antioquia.

Physical Address: Calle 3 Sur # 43 a - 52 Piso 18

Email to send inquiries or claims: [protecciondedatos@arquitecturayconcreto.com](mailto:protecciondedatos@arquitecturayconcreto.com)

Landline: (+574) 312 3618

### **Duties of the Responsible for the treatment of personal information**

In terms of the law, the duties of ARQUITECTURA Y CONCRETO S.A.S, its subsidiaries, and partners, regarding personal data:

- a) Guarantee the Holder, at all times, the full and effective exercise of the right to habeas data;
- b) Request and keep a copy of the respective authorization granted by the Holder;
- c) Properly inform the Holder about the purpose of the collection and the rights that assist him by the approval granted;
- d) Keep the information under the necessary security conditions to prevent its adulteration, loss, consultation, use, or unauthorized or fraudulent access;
- e) Guarantee that the information provided to the Treatment Manager, if it exists, is accurate, complete, exact, updated, verifiable, and understandable;
- f) Update the information, communicating on time to the Person in Charge of Treatment all the news regarding the data that you have previously provided and adopt the other necessary measures so that the information provided to it is kept updated;
- g) Rectify the information when it is incorrect and communicate the pertinent to the Person in Charge of Treatment;
- h) Provide the Treatment Manager, as the case may be, only data whose treatment is previously authorized by the provisions of this law;
- i) Require the Treatment Manager at all times to respect the security and privacy conditions of the owner's information;
- j) To process the queries and claims made in the terms indicated in the law;
- k) Adopt an internal manual of policies and procedures to guarantee adequate compliance with data protection and, especially, to attend to queries and complaints;
- l) Inform the Treatment Manager when certain information is under discussion by the Holder, once the claim has been submitted and the respective procedure has not been completed;
- m) Inform at the request of the Holder about the use given to their data;
- n) Inform the data protection authority when there are violations of the security codes and risks in administering the Holders' information.
- o) Comply with the instructions and requirements issued by the Superintendency of Industry and Commerce.

## Privacy or data protection officer

ARQUITECTURA Y CONCRETO SAS, its subsidiaries and partners, have appointed a person with adequate qualifications, resources, and sufficient competencies to perform functions of coordination, promotion, and supervision of the procedures and security measures of personal information in terms of law 1581 of 2012 and decree 1377 of 2013. This person is the one who, in the name and on behalf of ARQUITECTURA Y CONCRETO SAS, its subsidiaries or partners, resolves the queries and claims that the information holders may formulate.

## The number of databases:

ARQUITECTURA Y CONCRETO S.A.S., its subsidiaries, and partners have organized or may organize three (3) databases. The owner's location in one or more of them depends on the relationship with the person in charge. The databases are called - Suppliers: made up of the holders of information on whom ARQUITECTURA Y CONCRETO S.A.S. receives goods or services - Employees: made up of data holders who have a working relationship with ARQUITECTURA Y CONCRETO S.A.S.

## The following information may be collected from the holders of information:

Name or company name, identity card or N.I.T., fixed telephone number, cell phone number, email, social networks to which it is linked, profession, art, trade or economic activity, financial references, commercial references, personal references, financial statements, tax returns, experience, fingerprint.

Purposes of the Information Collected (Purpose of the database)

It is the purpose for which the personal data is collected:

**Name of the database:** Suppliers

**Purpose:** Accounting, tax, and administrative management - Supplier management.

**Description of Purpose:** Administrative management, supplier management, billing management, relationship history commercial.

**Database name:** Contacts

**Purpose:** Education and culture - Non-formal education. Various purposes- Customer loyalty. Accounting, fiscal and administrative management - Billing management. Advertising and commercial prospecting - Own advertising.

**Description of Purpose:** For customer loyalty, to send information and invitations to training, to send invoices, for customer service, and own advertising.

**Database name:** Employees and candidates

**Purpose:** Various purposes - Management of sanctions, warnings, calls for attention, Exclusions - Human resources - Personnel management.

**Description of Purpose:** Select human talent to join the human team of ARQUITECTURA Y CONCRETO S.A.S.

As for surveillance audios and videos, ARQUITECTURA Y CONCRETO S.A.S. uses various audio and video media for protection and control purposes. The information will be used for the security purposes of individuals, goods, and facilities. This information may be used as evidence in any judicial or administrative case and provided to the authorities upon request.

ARQUITECTURA Y CONCRETO S.A.S. is not obliged to collect and process personal data by any Republic of Colombia law. Still, whenever it does so to fulfill the purposes above, it submits and complies with the provisions of Law 1581 of 2012.

## Responsible for the Treatment

In terms of law 1581 of 2012, the person in charge of the treatment is the natural or legal person, public or private, who by himself or in association with others, carries out the Processing of personal data on behalf of the Person Responsible for the treatment, but at all times that ARQUITECTURA Y CONCRETO SAS deals directly and exclusively with the databases created by it. THERE ARE NO PROCESSORS.

## Customer service channels

The means that ARQUITECTURA Y CONCRETO S.A.S. has made available to the holders of information (suppliers, contacts, employees) for the attention of your queries, requests, and claims are the following:

**Website:** [www.arquitecturayconcreto.com](http://www.arquitecturayconcreto.com)

**Email:** [protecciondedatos@arquitecturayconcreto.com](mailto:protecciondedatos@arquitecturayconcreto.com)

**Point of personal attention:** Calle 3 Sur # 43 a - 52 Piso 18 Department of Antioquia in the city of Medellín (city code 05001)

**By phone:** 4-3123618

## The procedure of attention to the holders of information:

The procedure requirement is established in the law. The Holder or successor in title may only file a complaint with the Superintendency of Industry and Commerce once the consultation or claim process has been exhausted before the Treatment Manager or Treatment Manager.

a) Consultations. The Holders or their successors in title may consult the Holder's personal information that resides in ARQUITECTURA Y CONCRETO S.A.S. The Person in Charge of Treatment or Person in Charge of Treatment must provide them with all the information in the registry individual or linked to the Holder's identification. The consultation will be formulated through any of the channels above, and evidence of this must be created and kept. The query will be made through a request addressed to ARQUITECTURA Y CONCRETO SAS or the Treatment Manager, with the identification of the owner, the physical and electronic address, and telephone numbers. The query will be answered within a maximum term of ten (10) business days from the date of receipt of the same. When it is not possible to attend the query within said term, the interested party will be informed, stating the reasons for the delay and indicating the date on which the query will be attended, which in no case may exceed five (5) business days following the expiration of the first term.

b) Claims. The owner or his successors in title who consider that the information contained in a database of ARQUITECTURA Y CONCRETO S.A.S, its subsidiaries, and partners, should be subject to correction, updating or deletion, or when they notice the alleged breach of any of the duties contained in this law, they may file a claim with the Data Controller or the Treatment Manager, which will be processed under the following rules:

1. The license will be formulated using a request addressed to ARQUITECTURA Y CONCRETO S.A.S. or the Treatment Manager, with the identification of the Holder, the description of the facts that give rise to the claim, the address, and accompanying the documents that you want to enforce. If the request is incomplete, the interested party will be required within five (5) days after receiving the license to correct the faults. After two (2) months from the date of the request, without the applicant submitting the required information, it will be understood that the

claim has been withdrawn. Suppose the person who receives the claim is not competent to resolve it. In that case, they will transfer it to the corresponding person in a maximum term of two (2) business days, and they will inform the interested party of the situation.

2. Once the complete claim has been received, a legend that says "claim in process" and the reason for it will be included in the database, within a term no longer than two (2) business days. Said legend must be maintained until the claim is decided.

3. The maximum term to attend the claim will be fifteen (15) business days from the day following the date of receipt. When it is not possible to attend the request within said term, the interested party will be informed of the reasons for the delay and the date on which their claim will be attended, which in no case may exceed eight (8) business days following the expiration of the first finished.

### **Form of treatment of databases**

It stores and manages its databases in an automated way since it does so with electronic or computer tools and is located on its server in Colombia.

### **Information contained in the database**

The personal databases processed by ARQUITECTURA Y CONCRETO S.A.S., its subsidiaries, and partners contain information on minors and adults according to Colombian legislation, of these there are general and specific identification data, location data related to the activity commercial and professional and with private activity, data on socioeconomic content and other data such as tastes and interests and access codes to portals.

### **Information security measures**

The control measures implemented by ARQUITECTURA Y CONCRETO SAS, its subsidiaries and partners, for the protection of the information contained in the databases include the assignment of responsibilities and authorizations regarding the treatment of personal data, the implementation of confidentiality agreements with people who handle or have access to confidential information, security control for human resources once finalized the employment contract consists of restricting access to personal data processed by ARQUITECTURA Y CONCRETO S.A.S., its subsidiaries, and partners.

Emphasis is placed on these Control and Protection Policies:

1. The information processed by ARQUITECTURA Y CONCRETO S.A.S., its subsidiaries, and partners is made only by its employees and for the purposes established herein (Control Policy)
2. The employees of ARQUITECTURA Y CONCRETO S.A.S., of its subsidiaries and partners, cannot make copies of the personal information processed by ARQUITECTURA Y CONCRETO S.A.S.
3. The employees of ARQUITECTURA Y CONCRETO S.A.S., of its subsidiaries and partners, do not have remote access to the personal information processed by ARQUITECTURA Y CONCRETO S.A.S. by its subsidiaries and partners.

### **Holder authorization**

The databases structured by ARQUITECTURA Y CONCRETO S.A.S., by its subsidiaries and partners, in some cases have prior and informed authorization from the information holders; in the circumstances in which there is no authorization, this is because they are data of a public nature to be recorded, for example, in chambers of commerce.

In cases where you have authorization from the owner, this has been collected directly from him.

### **International data transfer**

ARQUITECTURA Y CONCRETO S.A.S, its subsidiaries, and partners have NOT made, nor do they carry out the international transfer of the information contained in the databases. And in any case, if at any time an information owner requests the international transfer of their data, their express and unequivocal authorization will be required for the transfer.

### **Database assignment**

ARQUITECTURA Y CONCRETO S.A.S, its subsidiaries, and partners have NOT made or are making any transfer of the databases created by it, nor have it authorized a loan or any use of it, neither to its employees nor to third parties.

### **Information update contained in the databases**

ARCHITECTURE AND CONCRETE S.A.S., its subsidiaries, and partners will update the information contained in the databases before a report from the owners thereof or verification from ARQUITECTURA Y CONCRETO S.A.S, its subsidiaries and partners, and by the law.

Date of entry into force of the information treatment policy and period of validity of the database. This is the text of the internal manual of policies and procedures for the treatment and protection of personal data (Law 1581 of 2012) of ARQUITECTURA Y CONCRETO S.A.S. which was prepared under the instruction and supervision of the administration so that it would produce effects in terms of the law; entered into force on 09/01/2016 and the validity period of the databases of ARQUITECTURA Y CONCRETO S.A.S., of its subsidiaries and partners, is during the validity of the contractual relationship and twenty (20) more years. In the case of data where there is no contractual relationship, the period of validity of the databases' data is for twenty (20) years.

### **Legal note**

The images that are presented are illustrative and, therefore, may present modifications. Also, they contain elements and furniture of aesthetic appreciation that are the artist's interpretation and do not compromise the promoter company. The plans are illustrative and constitute a reference to the spaces. Its dimensions were taken without including finishes. Its final design will correspond to the project plans approved by the competent authority.