

DATA PROTECTION POLICY

In accordance with Law 1581 of 2012, Decree 1377 of 2013 and other regulations that complement it, VIAPPIANI DE COLOMBIA S.A.S. (hereinafter the Company) issues this Data Protection Policy (hereinafter the Policy), taking into account the following:

1. Definitions:

- a) Database: Set of organized personal data subject to Processing;
- b) Personal Data: Any information linked or linkable to one or more specific or determinable natural persons;
- c) Public Data: Data other than semi-private, private or sensitive. Data relating to civil status, profession or data related to businessmen or public servants, among others, are considered public information. By their nature, public data can be contained, among others, in public registries, public records, official gazettes and bulletins and duly enforceable judgments not subject to reservation.
- d) Data Processor: Natural or legal, public or private person, who by himself or in association with others, processes personal data on behalf of the Controller;
- e) Data Controller: Natural or legal, public or private person, who by himself or in association with others, decides on the Database and/or Processing of data;
- f) Holder: Natural person whose personal data are processed;
- g) Processing: Any operation or set of operations on personal data such as collection, storage, use, circulation or deletion;

Taken from Law 1258 of 2012 and Decree 1377 of 2013.

2. Considerations:

- 2.1. VIAPPIANI DE COLOMBIA S.A.S. is a company committed to the protection of personal data.
- 2.2. The Policy applies to all personal data processed or to be processed by the Company.
- 2.3. The Policy is mandatory for the Company and any natural or legal person who, as Processor, processes personal data controlled by the Company during the term of the Processing, even if there is no legal, contractual, labor or of any other tie.
- 2.4. Holders of personal data have freely and voluntarily provided the information.
- 2.5. Holders of personal data are obliged to provide truthful, complete, accurate, current, verifiable and comprehensible information.
- 2.6. Any change in the Policy will be communicated promptly to the Holders of personal data before its implementation.

3. Personal Data Controller

VIAPPIANI DE COLOMBIA S.A.S., a legally constituted company, identified with NIT No. 900.486.095- 1, domiciled at Calle 5 A No. 39-194, Oficina 701, phone 555-00-00 and e-mail colombia@viappiani.com, will be responsible for the Processing of personal data.

4. Processing and purpose of Personal Data

VIAPPIANI DE COLOMBIA S.A.S. collects, stores, uses, updates, discloses and deletes its customers, suppliers and employees' personal data to comply with enforceable legal and contractual obligations and also uses them as a tool in the negotiation stage, as well as to comply with the principle of good faith, in the post-contractual stage.

VIAPPIANI DE COLOMBIA S.A.S., as data Controller, uses personal data processed to:

1. Comply with legal obligations;
2. Comply with labor obligations;
3. Comply with contractual obligations;
4. Carry out the negotiation process;
5. Offer products and services.

Once the data collected is no longer useful, the deletion process will be carried out. If the Holder requests the deletion of any data, it will be deleted once the legal process has been completed and provided that there is no existing contractual relationship between the Holder and the Company.

5. Rights of Holders of personal data:

Rights of the Holders are presented below:

- 5.1. Knowing, updating and rectifying their personal data. This right may be exercised, inter alia, with respect to partial, inaccurate, incomplete, split, or misleading data, or data which Processing is prohibited or not authorized;
- 5.2. Requesting proof of the authorization granted to the Controller, unless the authorization has been expressly excluded from the requirements for the Processing, which occurs in the following cases:
 - When the information has been requested by a public or administrative entity when exercising its legal duties or under a judicial order;
 - Public data;
 - Medical emergencies;
 - When the Processing is authorized by the law for historical, statistical or scientific purposes;
 - Data related to the Civil Registry.



- 5.3. Being informed by the Controller or the Processor, upon request, of the use given to their personal data;
- 5.4. Submitting complaints from violations of provisions of Act 1581 of 2012 and other regulations that modify, add or complement it before the Superintendency of Industry and Commerce;
- 5.5. Revoking the authorization and/or requesting the deletion of data when principles, rights and constitutional and legal guarantees are not respected during the Processing.
- 5.6. Free access to personal data processed.

6. Inquiries and Complaints

6.1. Inquiries:

Holders, their assignees and those authorized by them, upon certification of their nature¹, may submit any inquiries about the Holder's personal information by written communication addressed to the email address colombia@viappiani.com or to the Company's address, or verbally to one of the Company's employees.

All inquiries will be solved by the Habeas Data Committee not later than ten (10) business days as from the date of receipt thereof. When the inquiry cannot be addressed within that period, the party interested shall be informed, stating the reasons for the delay and indicating the date when his inquiry will be addressed, which in no case will exceed five (5) business days as from the expiration of the first term.

6.2. Complaints:

In case the Holder or his assignees consider that the information contained in a Database must be corrected, updated or deleted, or notice an alleged breach of any of the duties contained in Law 1581 of 2012, they may file a complaint before the Company.

The complaint shall be made by written communication addressed to the email address colombia@viappiani.com or to the Company's address, or verbally to one of the Company's employees, and shall contain at least the following information:

1. Identification of the Holder of the information;
2. Description of the facts that cause the complaint;
3. An address to receive communications;
4. A copy of the documents to be approved.

¹ The assignee must submit a copy of the civil registry or equivalent document and a person other than the assignee must provide an authorization from the Holder.

If the complaint is incomplete, the interested party will be required to provide the information within five (5) days following the receipt of the complaint. The interested party shall be deemed to have waived the complaint if the required information has not been submitted after two (2) months from the date of request.

In case VIAPPIANI DE COLOMBIA S.A.S. is not able to address the complaint, it will forward it to the appropriate entity not later than two (2) business days and will report the situation to the interested party.

Upon receipt of the complete complaint, a caption that says "complaint pending" and the reason for it will be included in the Database, not later than two (2) business days. The caption will appear until the complaint is solved.

The term to address the complaint will not exceed fifteen (15) business days as from the day following the date of its receipt. In case it is not possible to address the complaint within said period, the interested party shall be informed of the reasons for the delay and the date his complaint will be addressed, which in no case will exceed eight (8) business days following the expiration of the first term.

7. Effective date of the Policy of Processing of information and duration of the Database.

The Data Protection Policy shall enter into force upon its publication on the Company's website.

The duration of the Databases will be the same of the validity of the purpose of the information collected.

(SIGNED) Mr. Federico Restrepo

Date of approval of the amended Policy - August 18, 2016