



## PERSONAL DATA PROCESSING POLICY ACEROS SAS CENTER

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- 1. LEGAL REGULATIONS AND SCOPE OF APPLICATION:** This personal data processing policy is prepared in accordance with the provisions of the Political Constitution, Law 1581 of 2012, Regulatory Decree 1377 of 2013 and regulations for the protection of habeas data and other complementary provisions; will be applied by CENTRO ACEROS SAS regarding the collection, storage, use, circulation, deletion and all those activities that constitute processing of personal data.
- 2. DEFINITIONS:** For the purposes of the execution of this policy and in accordance with legal regulations, the following definitions will be applicable:
  - a) Authorization: Prior, express and informed consent of the Owner to carry out the Processing of personal data;
  - b) Privacy notice: Physical, electronic document or any other format generated by the Controller that is made available to the Owner for the processing of their personal data. In the Privacy Notice, the Owner is informed of the information regarding the existence of the information processing policies that will be applicable, the way to access them and the purpose of the treatment that is intended to be given to personal data;
  - c) Database: Organized set of personal data that is subject to Processing;
  - d) Personal data: Any information linked or that can be associated with one or several specific or determinable natural persons;
  - e) Public data: It is the data classified as such according to the mandates of the law or the Political Constitution and that which is not semi-private, private or sensitive. Public are, among others, data relating to the marital status of people, their profession or trade, their status as a merchant or public servant and those that can be obtained without any reservation. Due to its nature, public data may be contained, among others, in public records, public documents, official gazettes and bulletins;
  - f) Private data: It is the data that, due to its intimate or reserved nature, is only relevant to the owner;
  - g) Sensitive data: Sensitive data is understood to be data that affects the privacy of the Owner or whose improper use may generate discrimination, such as data that reveals racial or ethnic origin, political orientation, religious or philosophical convictions, membership of 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, sexual life and



biometric data; h) Data Processor: Natural or legal person, public or private, who, by themselves or in association with others, carries out the Processing of personal data on behalf of the Data Controller; i) Responsible for the Treatment: Natural or legal person, public or private, who alone or in association with others, decides on the database and/or the Processing of the data; j) Owner: Natural person whose personal data is the subject of Treatment; k) Treatment: Any operation or set of operations on personal data, such as collection, storage, use, circulation or deletion thereof.

### **3. PURPOSE FOR WHICH THE COLLECTION OF PERSONAL DATA AND THE PROCESSING OF THE SAME IS CARRIED OUT:**

CENTRO ACEROS SAS may use personal data to: **to**) Execute the existing contractual relationship with its clients, suppliers and workers, including the payment of contractual obligations; **b**) Provide the services and/or products required by its users; **c**) Inform about new products or services and/or changes in them; **d**) Evaluate the quality of the service; **and**) Conduct internal research on consumer habits; **F**) Send to physical, electronic, cell phone or mobile device, via text messages (SMS and/or MMS) or through any other analog and/or digital means of communication created or to be created, commercial, advertising or promotional information about the products and/or services, events and/or promotions of a commercial or non-commercial nature, in order to promote, invite, direct, execute, inform and in general, carry out campaigns, promotions or contests of a commercial or advertising nature, advanced by CENTRO ACEROS SAS and/or by third parties; **g**) Develop the selection, evaluation, and job placement process; **h**) Support internal or external audit processes; **Yo**) Register the information of employees and/or pensioners (active and inactive) in the databases of CENTRO ACEROS SAS j) Those indicated in the authorization granted by the data owner or described in the respective privacy notice, as the case may be; **k**) Provide, share, send or deliver your personal data to affiliated, linked, or subordinate companies of CENTRO ACEROS SAS located in Colombia or any other country in the event that said companies require the information for the purposes indicated here. Regarding the data (i) collected directly at the security points, (ii) taken from the documents that people provide to the security personnel and (iii) obtained from the video recordings that are made inside or outside the CENTRO ACEROS facilities. SAS, these will be used for security purposes of the people, assets and facilities of CENTRO ACEROS SAS and may be used as evidence in any type of process. If personal data is provided, said information will be used only for the purposes indicated here, and therefore, CENTRO ACEROS SAS will not proceed to sell, license, transmit, or disclose it, unless: (i) there is express authorization to do so ; (ii) is necessary to allow contractors or agents to provide the entrusted services; (iii) is necessary in order to provide our services and/or products; (iv) it is necessary to disclose it to the entities that provide services



marketing on behalf of CENTRO ACEROS SAS or other entities with which there are joint market agreements; (v) the information is related to a merger, consolidation, acquisition, divestiture, or other corporate restructuring process; (vi) that is required or permitted by law. CENTRO ACEROS SAS may subcontract third parties for the processing of certain functions or information. When the processing of personal information is actually subcontracted to third parties or personal information is provided to third party service providers, CENTRO ACEROS SAS warns said third parties about the need to protect said personal information with appropriate security measures, the use of the information is prohibited. for your own purposes and you are requested not to disclose personal information to others. l) The collection of sensitive data such as fingerprint is used for access control and employee attendance purposes. i) Said biometrics will be taken at the time of employment of the employee. ii) The employee will validate the fingerprint on each entry record to verify and record his attendance. iii) Biometrics will be registered digitally on an electronic device and validated against the stored database. iv) Said collection of initial data for registration and entry and exit will be carried out directly at the facilities of CENTRO ACEROS SAS m) Socio-economic data of clients, employees and partners such as stratum, home ownership, financial data and/or of an economic nature, Asset data such as movable and immovable property, income, etc. They are collected directly by the company for administrative purposes and are managed directly in the company CENTRO ACEROS SAS.

- 4. PRINCIPLES APPLICABLE TO THE PROCESSING OF PERSONAL DATA:** The processing of personal data at CENTRO ACEROS SAS will be governed by the following principles:**a) Purpose principle:**The Processing of the personal data collected must obey a legitimate purpose, which must be informed to the Owner;**b) Principle of freedom:**Treatment can only be carried out 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 requires consent;**c) Principle of truthfulness or quality:**The information subject to Treatment must be true, complete, accurate, updated, verifiable and understandable. The Processing of partial, incomplete, fragmented or misleading data will not be carried out;**d) Principle of transparency:**In the Treatment, the right of the Owner to obtain from CENTRO ACEROS SAS at any time and without restrictions, information about the existence of data that concerns him or her must be guaranteed;
- e) Principle of restricted access and circulation:**The Treatment is subject to the limits derived from the nature of the personal data, the provisions of this law and the Constitution. Personal data, except for public information, and the provisions of the authorization granted by the data owner, may not be available on the Internet or other means of dissemination or mass communication, unless access is technically controllable to



provide restricted knowledge only to the Owners or authorized third parties;

**f) Security principle:**The information subject to Treatment by CENTRO ACEROS SAS must be protected through the use of technical, human and administrative measures that are necessary to provide security to the records, avoiding their adulteration, loss, consultation, unauthorized or fraudulent use or access;**g) Principle of confidentiality:**All persons involved in the Processing of personal data are obliged to guarantee the confidentiality of the information, even after their relationship with any of the tasks included in the Processing has ended. **FIRST PARAGRAPH:**In the event that sensitive personal data is collected, the Owner may refuse to authorize its Treatment.

#### **5. RIGHTS OF THE HOLDERS OF PERSONAL DATA SUBJECT TO PROCESSING BY**

**CENTRO ACEROS SAS:**The holders of personal data themselves or through their representative and/or attorney-in-fact or their successor in title may exercise the following rights, with respect to the personal data that are subject to processing by CENTRO ACEROS SAS:**a) Right of access:**By virtue of which you will be able to access personal data that is under the control of CENTRO ACEROS SAS, for the purposes of consulting them free of charge at least once every calendar month, and whenever there are substantial modifications to the Information Processing Policies. that motivate new consultations;**b) Right to update, rectify and delete:**Under which you may request the updating, rectification and/or deletion of the personal data being processed, in such a way that the purposes of the treatment are satisfied;**c) Right to request proof of authorization:**except in events in which, according to current legal regulations, authorization is not required to carry out the treatment;**d) Right to be informed regarding the use of personal data;****e) Right to file complaints with the Superintendency of Industry and Commerce:** for violations of the provisions of current regulations on the processing of personal data;**f) Right to require compliance with orders issued by the Superintendence of Industry and Commerce. FIRST PARAGRAPH:**For the purposes of exercising the rights described above, both the owner and the person who represents him or her must demonstrate their identity and, if applicable, the capacity by which they represent the owner.**SECOND PARAGRAPH:**The rights of minors will be exercised through the people who are authorized to represent them.

**6. DUTIES OF CENTRO ACEROS SAS:** All those obliged to comply with this policy must keep in mind that CENTRO ACEROS SAS is obliged to comply with the duties imposed by law in this regard. Consequently, the following obligations must be met:**A. Duties when acting as responsible: (i)**Request and keep, under the conditions provided in this policy, a copy of the respective authorization granted by the owner.**(ii)**Inform the owner clearly and sufficiently about the purpose of the collection and the rights granted to him by virtue of the authorization granted.**(iii)**Inform at the request of the owner about the use given to their personal data**(iv)**Process the



queries and claims formulated in the terms indicated in this policy.(v)Ensure that the principles of truthfulness, quality, security and confidentiality in the terms established in the following policy.(saw)- Keep the information under the security conditions necessary to prevent its adulteration, loss, consultation, use or unauthorized or fraudulent access.(vii)Update information when necessary.(viii) Rectify personal data when appropriate.**B. Duties when acting as Personal Data Processor.**If you process data on behalf of another entity or organization (Data Controller), you must comply with the following duties:(Yo) Establish that the Data Controller is authorized to provide the personal data that will be processed as Processor.(i)Guarantee the holder, at all times, the full and effective exercise of the right of habeas data.(iii) Maintain the information under the security conditions necessary to prevent its adulteration, loss, consultation, use or unauthorized or fraudulent access.(iv)Timely update, rectify or delete data.(v)Update the information reported by the Data Controllers within five (5) business days from receipt.(saw)Process queries and claims made by the owners in the terms indicated in this policy.(vii)Register in the database the legend "claim in process" in the manner established in this policy.(ix)Insert into the database the legend "information under judicial discussion" once notified by the competent authority about judicial processes related to the quality of personal data.(x) Refrain from circulating information that is being controversial by the owner and whose blocking has been ordered by the Superintendency of Industry and Commerce.(xi)Allow access to the information only to people authorized by the owner or empowered by law for this purpose.(xii)Inform the Superintendency of Industry and Commerce when violations of security codes occur and there are risks in the administration of the owners' information.(xiii)Comply with the instructions and requirements issued by the Superintendence of Industry and Commerce.**C. Duties when processing through a Processor (i)** Provide the Data Processor only with personal data whose processing is previously authorized. For the purposes of the national or international transmission of data, a contract for the transmission of personal data must be signed or contractual clauses agreed upon as established in article 25 of decree 1377 of 2013.(i)Guarantee that the information provided to the Data Processor is true, complete, accurate, updated, verifiable and understandable.(iii)Communicate in a timely manner to the Data Processor 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 up to date.(iv)Inform the Data Processor in a timely manner of the rectifications made to the personal data so that he or she can proceed to make the pertinent adjustments.(v)Demand from the person in charge of the treatment, in all



moment, respect for the security and privacy conditions of the owner's information. **(saw)** Inform the Data Processor when certain information is under discussion by the owner, once the claim has been submitted and the respective process has not been completed. **D. Duties regarding the Superintendency of Industry and Commerce (i)** Inform you of possible violations of security codes and the existence of risks in the administration of the owners' information.

**(ii)** Comply with the instructions and requirements issued by the Superintendence of Industry and Commerce.

**7. REQUEST FOR AUTHORIZATION TO THE OWNER OF THE PERSONAL DATA:** In advance and/or at the time of collecting personal data, CENTRO ACEROS SAS will request the owner of the data for authorization to collect and process it, indicating the purpose for which the data is requested, using automated technical means for these purposes. , written or oral, that allow proof of the authorization and/or unequivocal conduct described in article 7 of Decree 1377 of 2013 to be preserved. Said authorization will be requested for the time that is reasonable and necessary to satisfy the needs that gave rise to the the request for the data and, in any case, with observance of the legal provisions that govern the matter.

**8. NOTICE OF PRIVACY:** In the event that CENTRO ACEROS SAS cannot make this information processing policy available to the owner of the personal data, it will publish the privacy notice attached to this document, the text of which will be kept for later consultation by the owner. of the data and/or the Superintendence of Industry and Commerce.

**9. TEMPORARY LIMITATIONS ON THE PROCESSING OF PERSONAL DATA.**

CENTRO ACEROS SAS may only collect, store, use or circulate personal data for as long as is reasonable and necessary, in accordance with the purposes that justified the treatment, taking into account the provisions applicable to the matter in question and the administrative aspects. , accounting, fiscal, legal and historical information. Once the purpose(s) of the processing have been fulfilled and without prejudice to legal regulations that provide otherwise, the personal data in its possession will be deleted. Notwithstanding the above, personal data must be preserved when required to comply with a legal or contractual obligation.

**10. RESPONSIBLE AREA AND PROCEDURE FOR THE EXERCISE OF THE RIGHTS OF THE PERSONAL DATA HOLDERS:**

The CUSTOMER SERVICE AREA of CENTRO ACEROS SAS will be responsible for addressing the requests, complaints and claims made by the owner of the data in exercise of the rights contemplated in section 5 of this policy, with the exception of that described in its literal and). For these purposes, the owner of the personal data or whoever represents it may send their request, complaint or claim during business hours to the email [info@centroaceros.com](mailto:info@centroaceros.com) call the CENTRO ACEROS SAS telephone line, (4) 301 22 44, or



file it at the following address corresponding to our offices: CL 80 SUR 47 F 55.

The request, complaint or claim must contain the identification of the Owner, the description of the facts that give rise to the claim, the address, and accompanying the documents that you want to assert. If the claim is incomplete, the interested party will be required within five (5) days following receipt of the claim to correct the deficiencies. After two (2) months from the date of the request, without the applicant presenting the required information, it will be understood that he has withdrawn the claim. In the event that the person receiving the claim is not competent to resolve it, he or she will forward it to the appropriate person within a maximum period of two (2) business days and will inform the interested party of the situation. Once the complete claim is received, a legend that says "claim in process" and the reason for it will be included in the database within a period of no more than two (2) business days. Said legend must be maintained until the claim is decided. The maximum term to address the claim will be 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 interested party will be informed 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.

eleven. **SECURITY MEASURES:** In development of the security principle established in Law 1581 of 2012, CENTRO ACEROS SAS will adopt the technical, human and administrative measures that are necessary to provide security to the records, preventing their adulteration, loss, consultation, unauthorized or fraudulent use or access. . The personnel who process personal data will execute the established protocols in order to guarantee the security of the information. For this purpose, backups of digitized files will be available on internal and external media. These backups will be protected with access controls that the data controller will know in their technology areas.

12. **EFFECTIVE DATE:** This Personal Data Policy was created on October 20, 2016 and comes into force as of May 1, 2017. Any change that occurs with respect to this policy will be reported through the email address: [www.centroaceros.com](http://www.centroaceros.com)

Sincerely,

ACEROS SAS CENTER  
ADDRESS: CL 80 SUR 47 F 55