



## POLICY FOR THE TREATMENT OF PERSONAL DATA OF TITULARICE S.A.

### CHAPTER 1

#### GENERAL PROVISIONS

1. **Applicable legislation.** These Policies incorporate the mandates contained in Articles 15 and 20 of the Political Constitution of Colombia, Law 1581 of 2012, Decree 1377 of 2013 and Decree 1074 of 2015.
2. **Scope of application.** These Policies apply to the Processing of Personal Data for which Titularice S.A. ("**Titularice**"), or its designee, is the Controller and/or Processor under the terms of the law.
3. **Definitions.** The following definitions shall be taken into account for the interpretation of these Policies and shall be used interchangeably in the singular or plural without altering their meaning.
  - a) **Titularice.** It is a Colombian company, domiciled in Bogotá, who for the purposes of the Policies acts as Responsible and/or Responsible for the Processing of Personal Data of the Databases as appropriate. The company is identified with the NIT 901.598.194-5 .
  - b) **Authorization.** Prior, express and informed consent of the Data Subject to carry out the Processing of Personal Data.
  - c) **Personal Data Base.** Organized set of Personal Data that are subject to Processing by Titularice, or whoever it may designate, in its capacity as Controller and/or Processor of the Personal Data.
  - d) **Personal Data.** Any information linked or that can be associated to one or several determined or determinable natural persons.
  - e) **Public Data.** It is the data qualified as such according to the law or the Political Constitution of Colombia. Some examples are the marital status of persons, their profession or trade, their status as 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, duly executed judicial sentences that are not subject to reserve.
  - f) **Data of Minors and Adolescents.** These are Personal Data whose Owners are minors, understood as subjects under 18 years of age, whose

Processing shall ensure the prevalence of their fundamental rights. This typology of data includes those belonging to infants who will have a special treatment because they belong to a population with prevalent rights.

- g) **Sensitive Data.** They are those that may affect the privacy of the Data Subject or whose improper use may generate discrimination, such as those that reveal racial or ethnic origin, political orientation, religious or philosophical convictions, membership in trade unions, social organizations, human rights or that promote the interests of any political party or that guarantee the rights and guarantees of opposition political parties as well as data relating to health, sex life and biometric data.
  - h) **Data Processor or Data Processor.** Natural or legal person, public or private, which by itself or in association with others, performs the Processing of Personal Data on behalf of the Data Controller.
  - i) **Titularice Website.** This is Titularice's web page, which is located at the following URL: [titularice.com](http://titularice.com)
  - j) **Policies.** These are the Policies and Procedures for the Processing of Personal Data adopted by Titularice.
  - k) **Data Controller or Data Processor.** Natural or legal person, public or private, that by itself or in association with others, decides on the Database and/or the Processing of Personal Data.
  - l) **SIC.** It is the Superintendence of Industry and Commerce, administrative authority on personal data protection in Colombia.
  - m) **Data Subject.** Natural person whose Personal Data is the object of Processing.
  - n) **Transfer.** The Transfer of Personal Data is the sending of Personal Data from the Controller and/or Processor to a third party that is located outside or inside the country and that in turn will be treated as the Data Controller.
  - o) **Transmission.** Processing of Personal Data made by the Processor on behalf of the Controller, and which implies a communication or sending of the Personal Data within or outside the Colombian territory.
  - p) **Processing.** Any operation or set of operations on Personal Data, such as the collection, storage, use, circulation or deletion of Personal Data.
4. **Purpose.** The preparation and publication of these Policies complies with the provisions of Article 17, paragraph k and Article 18, paragraph f

of Law 1581 of 2012, and has the purpose of regulating the procedures for the collection, handling, and in general, for the Processing of Personal Data carried out by Titularice, or whoever it designates, in order to guarantee and protect the rights of the Data Controllers.

**5. Principles.** The following principles constitute the general framework for compliance with the provisions enshrined in these Policies:

- a) **Principle of purpose.** The Processing must obey a legitimate purpose in accordance with the Constitution and the law, which must be informed to the Data Subject.
- b) **Principle of freedom.** Processing may only be carried out with the prior, express and informed consent of the Data Subject. Personal data may not be obtained or disclosed without prior authorization, or in the absence of legal or judicial mandate that relieves the consent.
- c) **Principle of truthfulness or quality.** The information subject to Processing must be truthful, complete, accurate, updated, verifiable and understandable. The processing of partial, incomplete, fractioned or misleading data is prohibited.
- d) **Principle of transparency.** The right of the Data Subject to obtain from the Controller or Processor, at any time and without restrictions, information about the existence of Personal Data concerning him/her, must be guaranteed in the Processing.
- e) **Principle of restricted access and circulation.** Processing is subject to the limits derived from the nature of the personal data and the applicable law.
- f) **Principle of security.** The information subject to Processing by the Responsible or Responsible Party shall be handled with the technical, human and administrative measures necessary to provide security to the records avoiding their adulteration, loss, consultation, use or unauthorized or fraudulent access.
- g) **Principle of confidentiality.** All persons involved in the processing of personal data that are not of a public nature are obliged to guarantee the confidentiality of the information, even after the end of their relationship with any of the tasks involved in the processing, and may only provide or communicate personal data when it corresponds to the development of the activities authorized by law and under the terms of this.
- h) **Protection of Sensitive Data.** Neither Titularice nor whoever it designates as Data Controller or Data Processor shall collect or process

Sensitive Data without the express and special authorization of the Data Subject.

- i) **Data Protection of Minors.** These Policies shall take into account the prevailing rights of minors, providing special protection to their fundamental rights in accordance with the Political Constitution of Colombia.
6. **Databases.** In accordance with the parameters and thresholds defined by the applicable regulations, the policies and procedures over which Titularice is Responsible, are subject to registration in the National Registry of Databases in accordance with the provisions of Article 25 of Law 1581 of 2012, Decree 886 of 2014 and other rules that regulate, modify or compile it.

## **CHAPTER II**

### **RIGHTS OF THE OWNERS**

7. **Rights of the Data Controllers.** The Owners of the Personal Data contained in the Personal Data Bases of Titularice have the following rights, which do not limit those enshrined in the Political Constitution of Colombia and the law:
  1. **Right of access.** The Data Subject has the right to obtain information regarding the Personal Data belonging to him/her, to know the purpose for which the Processing is carried out, the location of the Databases that store his/her Personal Data and the communications and/or assignments and/or transfers that have been made with respect to them.
  2. **Right to update.** The Data Subject may update his/her Personal Data when they have undergone any change.
  3. **Right of rectification.** The Data Subject may modify his Personal Data when they turn out to be inaccurate, incomplete or non-existent.
  4. **Right of cancellation.** The Data Subject may delete his/her Personal Data when it is excessive or not relevant for the purpose of the Processing, or the Processing is contrary to the rules, except in those cases contemplated as exceptions by law.
  5. **Right to revoke consent.** The Data Subject may revoke the authorization or consent that enables Titularice and/or its designee, to a Processing for a specific purpose, except when there is a legal or contractual duty that imposes the duty for the Personal Data to remain in Titularice's Databases.

- 6. Right to file complaints and claims or to exercise actions regarding the Processing of Personal Data.** The Data Subject may file before the SIC, or the competent entity, complaints and claims, as well as the actions that may be pertinent for the protection of his/her Personal Data.
- 7. Right to grant Authorization for the Processing of Personal Data.** The Data Subject has the right to grant Authorization to Titularice, or its designee, for the Processing of his/her Personal Data.

**Paragraph.** The exercise of these rights shall be free of charge and unlimited by the Personal Data Subject, without prejudice to the legal provisions regulating the exercise of these rights.

The exercise of these rights constitutes a very personal power and shall be exercised exclusively by the Data Subject, except for the exceptions established by law.

- 8. Mechanisms to grant the Authorization.** The Authorization of the Holder shall be collected by means of a physical or electronic document, or in any other format that allows guaranteeing its subsequent consultation. The Authorization shall be granted by the Data Subject to Titularice, or its designee, and guarantees that the Data Subject has been made aware of both the Policies and the rights to which he/she is entitled regarding the Processing of the Personal Data he/she provides.
- 9. Proof of Authorization.** Titularice, and/or its designee, shall adopt such measures as may be necessary to keep records of when and how it obtained Authorization from the Data Controllers for the Processing of such data.

### CHAPTER III

#### OBLIGATIONS OF SECURITIZATION

- 10. Obligations of the Controller.** Titularice, in its capacity as Controller of the Personal Data contained in the Personal Data Bases, shall comply with the following obligations:
  - 1.** Guarantee to the Data Subject, at all times, the full and effective exercise of the right of habeas data.
  - 2.** Request and keep, under the conditions provided for in the applicable regulations, a copy of the respective Authorization granted by the Holder.

- 3.** Duly inform the Data Subject about the purpose of the collection of Personal Data and the rights he/she is entitled to by virtue of the Authorization granted.
- 4.** Preserve and store the Personal Data provided under the necessary security conditions to prevent its adulteration, loss, consultation, use or unauthorized or fraudulent access.
- 5.** Ensure that the information provided to the Data Processor, as the case may be, is truthful, complete, accurate, updated, verifiable and understandable.
- 6.** To update the information, communicating in a timely manner to the Data Processor, all the news regarding the Personal Data previously provided and to adopt the necessary measures so that the information provided to the Data Processor is kept updated.
- 7.** Rectify the information when it is incorrect and communicate the pertinent to the Data Processor.
- 8.** To provide to the Data Processor, as the case may be, only Personal Data whose Processing is previously authorized in accordance with the provisions of the applicable regulations.
- 9.** To require the Data Processor at all times to respect the security and privacy conditions of the Data Subject's Personal Data.
- 10.** To process the queries and claims made by the Holders under the terms set forth in these Policies and the law.
- 11.** Inform the Data Processor at all times, respecting the security and privacy conditions of the Data Subject's information.
- 12.** Process queries and claims formulated in the terms set forth in Articles 14 and 15 of Law 1581 of 2012 and those set forth in the Policies.
- 13.** Inform the Data Processor when certain information is under discussion by the Data Subject, once the claim has been filed and the respective process has not been completed;
- 14.** Inform, at the request of the Data Subject, about the treatment that is being given to his/her Personal Data.
- 15.** Inform the data protection authority when there are violations to the security codes and there are risks in the administration of the Personal Data of the Data Controllers.

16. Comply with the instructions and requirements given by the SIC regarding Personal Data protection.

11. **Obligations of the Data Processor. The Data** Controller, and/or its designee, in its capacity as Data Processor of the Personal Data contained in the Personal Data Bases, shall comply with the following obligations:

1. Guarantee to the Data Subject, at all times, the full and effective exercise of the right of habeas data.
2. Keep the information under the necessary security conditions to prevent its adulteration, loss, consultation, use or unauthorized or fraudulent access.
3. Timely update, rectification or deletion of Personal Data under the terms of the law.
4. Update the information reported by the Data Controller within fifteen (15) working days from its receipt.
5. To process queries and claims made by Data Holders under the terms set forth in the Policies and the law.
6. Register in the Personal Data Base the legend "claim in process" in the manner regulated by law, with respect to those queries, complaints or claims that have not been resolved, which have been submitted by the Personal Data Owners.
7. Annotate in the Personal Data Base the legend "information under judicial discussion" once notified by the competent authority about judicial processes related to the quality of the Personal Data.
8. Refrain from circulating information that is being disputed by the Data Subject and whose blocking has been ordered by the SIC.
9. Allow access to information only to those who can access it.
10. Inform the SIC when there are violations to the security codes and there are risks in the administration of the information of the holders.
11. Comply with the instructions and requirements given by the SIC.

**Personal Data collected.** Titularice, in its capacity as Data Controller, may collect Personal Data such as the name, surname and identification data of the Holder, location and contact data such as physical, electronic, telephone and cellular addresses, data related to gender and age, date of birth, information related to the location of the device used to browse the Titularice

Web Page as appropriate, and data of a sensitive nature. In attention to the corporate purpose of Titularice, it may collect financial and legal information of customers, as well as data required to carry out legal feasibility studies for securitizations. It may also collect data about the beneficial owners of the clients, information about the backing of assets and the information required to carry out due diligence valuations. Identity documents and data required for employee engagement may be collected. Depending on the form used by the Holder and provided by Titularice for such purpose, this information may or may not be required .

In those cases in which Titularice requests and collects Sensitive Data, the Data Subject accepts and acknowledges that he/she has been informed about the particular purposes for the use of such information and that he/she is not obliged to provide such information under the terms of the legislation in force.

Titularice may collect financial information for the purpose of carrying out transactions for the acquisition of services offered . This information will be used for the purpose of materializing the payment relationship and will be treated based on the applicable legislation on financial, commercial and credit data, and the legitimate purposes mentioned therein for its use as an element of analysis to establish and maintain a contractual or commercial relationship, whatever its nature, the report to credit bureaus, as well as for the evaluation of risks arising from a contractual relationship in force.

The Personal Data provided by the Holder will be used for the purposes of providing the services that they contract with Titularice. In case the Holder decides not to provide the Personal Data requested, he/she accepts and acknowledges that all or part of Titularice's services may not be provided. Thus, the Holder accepts that he/she is not obliged to give his/her consent to the Processing of your Data, but if he/she does not do so, Titularice will not be able to provide the requested services or send him/her information of his/her interest through the communication channels that Titularice has provided for such purpose.

**12. Transmission of Personal Data.** For the Transmission of the Personal Data of the Data Controllers, as well as for any Transmission that Titularice carries out for the fulfillment of the purposes of the Processing or to delegate the Processing to a third party that becomes a Processor, Titularice shall take all the necessary measures to ensure compliance with these Policies, as well as to guarantee the exercise of the Data Controller's rights.

**13. Transfer of Personal Data.** In the event that Titularice temporarily or definitively transfers the Personal Data to a third party, within or outside the country, in which case such third party shall become the Controller

of the Personal Data, it shall take the necessary measures to preserve the rights of the Data Controllers during the Transfer.

- 14. Temporality in the Treatment.** The Personal Data collected by Titularice will be processed for the time required for the fulfillment of the purposes described in these Policies.
- 15. Special Treatment of Personal Data of Minors.** The Processing of Personal Data belonging to Minors shall be carried out exceptionally and only when necessary based on the purposes for the processing of information, which shall be authorized by their guardians and/or representative and shall take into account the prevailing rights of the children who act as Data Holders.
- 16. Confidentiality.** Titularice will protect the privacy of the information. It may happen that, by virtue of court orders or legal regulations, information must be disclosed to the authorities that require it.
- 17. National Registry of Databases.** Titularice, in accordance with the parameters and thresholds determined by the applicable regulation, registers the databases for which it is Responsible under the terms of the legislation in force, which is carried out before the National Registry of Databases managed by the SIC. In accordance with the applicable regime, Titularice performs the update of such registry, for which it follows the procedures set forth by the competent authority.
- 18. Cookies.** Titularice may use "cookies" or similar technologies for the collection of this type of personal data. Cookies are a small amount of data that generally includes an anonymous unique identifier that is sent to the Cardholder's computer or device through a website and stored on the Cardholder's hard drive in order to safeguard the Cardholder's browsing preferences. This data stored on the Cardholder's hard drive helps to improve access to and use of the services that are offered by Titularice.

The Holder can configure their browser to accept all cookies, reject all cookies, or receive a notification when a cookie is sent.

Please note that if you choose to reject all cookies, you may not be able to effectively use some of the resources and services offered by Titularice.

The use of cookies to identify the Holder avoids having to configure navigation preferences, which is applied under strict security standards. This procedure allows the Holder to save time. Cookies may also allow tracking and targeting of the interests of Data Subjects in order to improve their experience with the services provided by Titularice. In general, Titularice, or its designee, may use

this information to improve the Cardholder's experience, as well as the quality of the functionalities that comprise it.

**19. Communication of information.** Titularice may communicate, transmit or transfer your personal data to third parties located within or outside the national territory. In case of communications of this nature, Titularice guarantees that it will do so with the appropriate guarantees established in the legislation in force and will send the information to safe information ports. The personal information of the users may be communicated to the companies that make up the group to which Titularice belongs, whether they are located inside or outside the country, to the commercial establishments and commercial allies with which it has a contractual relationship in force and to third parties that require the information for its Processing in accordance with the purposes contained in these Policies.

**20. Security.** Titularice guarantees that it will comply with the duty of confidentiality of the user's data and will keep them until the user communicates its will to unsubscribe or as long as there are legal or contractual obligations that justify keeping the data, in accordance with the regulations in force. Titularice shall adopt the security measures required by the applicable legislation to avoid, in relation to the personal data of the Holder, its alteration, loss, treatment or unauthorized access, always in accordance with the state of the available technology.

Titularice takes precautions to protect the personal information of the Holders, which is safeguarded both on-line and off-line. The Holder accepts and acknowledges that each time Titularice collects personal information, which will have a confidential connotation in its systems, such information is delivered and treated securely through network security protocols.

To protect the integrity of the information, only employees who need it, or duly authorized third parties, will have access to it for the specific work they must perform. The computers and servers in which Titularice stores the information are kept in a safe and secure environment. The Holder accepts and acknowledges that Titularice may process the personal information of the Holder in a server located inside or outside the country where it is located.

## CHAPTER IV

### PROCEDURES ESTABLISHED TO GUARANTEE THE EXERCISE OF THE RIGHTS OF THE RIGHTS HOLDERS

**21. Attention to queries and claims.** The Data Controller may exercise the rights described in Article 6 of these Policies by writing to the following address: Avenida 100 No. 13-95, Piso 11 Norte, Bogotá, Colombia.

Likewise, for any question derived from the present Policies and for the exercise of his/her rights, the Holder may contact Titularice through the e-mail [contacto@titularice.com](mailto:contacto@titularice.com), or by calling the following telephone line 315 564 8052. These service channels are assigned to the Administrative Management and Structuring Management, which are internally responsible for ensuring the protection of the rights arising from the regime of protection of personal data.

**22. Procedure for consultations.** The Data Subject or his/her successors in title may make inquiries about his/her Personal Data contained in the Database, either in writing or in person through the means described in the previous Article of these Policies. Consequently, Titularice, or its designee, shall guarantee the right of consultation, providing the Data Subject or its assignees with all the information contained with the identification of the Data Subject.

The consultation will be answered within a maximum term of fifteen (15) business days from the date of receipt thereof. When it is not possible to answer the consultation within such term, the Data Subject will be informed, stating the reasons for the delay and indicating the date on which the consultation will be answered, which, in no case, may exceed five (5) business days following the expiration of the initial term.

**23. Procedure for claims.** The Data Subject or his/her assignees who consider that the information contained in the Database should be corrected, updated or deleted, or when they notice the alleged breach of any of the duties contained in the Personal Data protection regulations or these Policies, may file a complaint with the Data Controller, which must include: (i) the identification of the Data Subject; (ii) the description of the facts giving rise to the claim; (iii) the physical or electronic address where they wish to receive notifications; and (iv) the documents supporting the facts of the claim.

The claim shall be formulated in writing addressed to Titularice, or its designee, and shall be sent through the channels described in these Policies.

If the claim is submitted incompletely, the Holder or its assignees will be required within five (5) days after receipt of the claim to complete the claim.

If two (2) months have elapsed from the date of the request without the applicant submitting the required information, it shall be understood that the claimant has withdrawn its claim.

Once the complete claim has been received, a legend indicating "claim in process" and the reason for the claim will be included in the Data Base, within a term no longer than two (2) business days. Said legend shall be maintained until the claim is assigned.

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

- 24. Complaints before the SIC.** The Registrant, its assignees or attorneys-in-fact, shall exhaust the consultation process before Titularice or its designee, prior to the filing of any complaint before the SIC.

## CHAPTER V

### PURPOSE AND VALIDITY OF THE POLICIES

- 25. Purpose of the Processing of Personal Data.** Titularice may use the Personal Data it collects for labor, commercial, contractual and financial purposes, as well as to carry out the activities inherent to its corporate purpose:
- a) **Labor purposes.** Payroll management, admission and selection processes of Titularice or third party personnel, linkage to the social security system in favor of the Titularice and its family members, occupational health, safety at work, feeding the information required by the health and social security management systems, and to establish contact with former employees.
  - b) **Contractual and financial purposes.** Processes of admission, selection and engagement of contractors, suppliers and customers of Titularice, and to achieve an efficient communication with the parties involved in the contracts to be signed in the development of the corporate purpose of Titularice, such as for engagement and financial feasibility of securitizations, and the required legal feasibility studies.
  - c) **Commercial purposes.** To answer requests for services, process requests for information or services, maintain existing contractual and pre-contractual relationships, offer services, and send promotions and/or products of Titularice. In case of receiving advertising from the Web Page or in the process of providing services, personal data may be provided to third parties with whom Titularice has a relationship, to carry out the same purposes described herein.
  - d) **Purposes for the provision of services.** Titularice shall process the Personal Data it collects in order to comply with the obligations undertaken with the Holders of the Personal Data and Sensitive Personal Data, to carry out activities related to the corporate purpose of Titularice and to execute contractual relationships, to share, transfer and transmit the Personal Data to third party service providers that are in charge of

the Processing of the Personal Data, who may store, process, protect and maintain the Personal Data provided, attend and manage the requests and suggestions made by the Data Controllers about the services provided, store the information provided in compliance with the regulations in force on the matter, deliver the Data to governmental entities when so requested, comply with the regulations relevant to the activities that comprise the corporate purpose of Titularice, and attend administrative and judicial requirements when so required, invoice the services, send information related to the products of Titularice, and carry out advertising campaigns.

- 26. Validity.** This Manual is effective as of the date of its issuance. The period of validity of the databases shall be governed by the provisions governing the matter in accordance with the principles of purpose and temporality of the information.
- 27. Changes to these Policies.** Titularice may review the provisions contained in these Policies and make such modifications as it deems appropriate. The most recent version of the Policies will govern the use of personal information. If a change is made that is material, we will notify the Registrant's e-mail address of such event.
- 28. Policy Updates.** These Policies were last updated in July 2022 and may be reviewed or updated every 12 months. The most current version of the Policies will be posted on the Titularice website.

Given in Bogotá in the month of February 2023.