

PERSONAL DATA PROTECTION POLICY



1. Scope:

This policy applies to the companies that make up the Constructora Conconcreto S.A. Business Group, consisting of Constructora Conconcreto S.A., Inmobiliaria Conconcreto S.A.S., Industrial Conconcreto S.A.S., Cantera la Borrascosa S.A.S., Sistemas Constructivos Avanzados Zona Franca S.A.S., U-Storage S.A.S., Consorcio Mercantil Colombiano S.A. En Liquidación, DobleCe Re Ltd. (Bermuda), Conconcreto Internacional S.A. (Panama), Conconcreto Inversiones y Servicios S.A.

(Panama) and any others that may join the Constructora Conconcreto S.A. Business Group from time to time, as well as the company Consalfa S.A.S., hereinafter referred to as the Companies.

2. Purpose:

The purpose of this document is to regulate the policies and procedures that will be applicable in the handling of personal data information by the Companies, in accordance with the provisions contained in Law 1581 of 2012 and Decree 1377 of 2013.

3. Data controllers:

Company name	Head Office	Phone	Fax	Website	Email	Contact Person Contact
Conconcreto Construction Company S.A.	Cra. 43 A # 18 Sur 135 4th Floor Sao Paulo Plaza. Medellín	(57-4) 4025700	(57-4) 4025786	www.conconcreto.com	habeasdata@conconcreto.com	Ana Isabel Villegas García
Conconcreto Real Estate S.A.S.	Cra. 43 A # 18 Sur 135 4th Floor, Sao Paulo Plaza. Medellín	(57-4) 4025700	(57-4) 4025786	www.conconcreto.com	habeasdata@conconcreto.com	Ana Isabel Villegas García
Industrial Conconcreto S.A.S.	5th Street B No. 21-24 Girardota	(57-4) 4025700	(57-4) 4025786	www.industrialconconcreto.com	habeasdata@conconcreto.com	Lina María Guzmán Ortiz
Cantera La Stormy S.A.S.	Km 23 via Las Palmas El Retiro	(57-4) 4025700	(57-4) 4025786	www.industrialconconcreto.com/agregados	habeasdata@conconcreto.com	Lina María Guzmán Ortiz
Advanced Construction Systems Free Trade Zone S.A.S.	Km 14 Av Cordialidad Mz 11 Lt. 45 and 46 Galapa	(57-4) 4025700	(57-4) 4025786	N/A	habeasdata@conconcreto.com	Lina María Guzmán Ortiz
U-Storage	143rd Street	(57-4)	(57-4)	www.ustorage.co	habeasdata@conconcreto.com	Ana Isabel

S.A.S.	No. 50-27 Bogotá	4025700	4025786			Villegas García
Colombian Commercial Consortium S.A. In Liquidation	Cra. 43 A # 18 Sur 135 4th Floor Sao Paulo Plaza. Medellín	(57-4) 4025700	(57-4) 4025786	N/A	habeasdata@conconcreto.com	Ana Isabel Villegas García
Consalfa S.A.S.	Carrera 6 No. 115-65 Area F Office 409 Bogotá	(57-4) 4025700	(57-4) 4025786	www.consalfa.com	habeasdata@conconcreto.com	Ana Isabel Villegas García

The entity responsible for processing personal data for all legal purposes is Constructora Conconcreto S.A. The companies DobleCe Re Ltd. (Bermuda), Conconcreto Internacional S.A. (Panama), and Conconcreto Inversiones y Servicios S.A. (Panama) are regulated by the personal data protection regulations applicable in each country.

3. Processing to which personal data will be subjected and the purpose of the processing:

Processing is any operation or set of operations performed on personal data, such as collection, storage, preservation, recording, use, circulation, or deletion.

The information collected by the Companies in the provision of their services and, in general, in the pursuit of their corporate purpose, is used primarily to identify, maintain a record of, and monitor the Companies' suppliers, customers, shareholders, contractors, and employees, in order to comply with the obligations arising from the legal, commercial, contractual, or any other relationship with the Companies, as well as to enforce the rights of the parties under such relationships, to keep the owners of personal data informed about the goods and services provided by the Companies, to send them advertising, commercial, and marketing information, information about events, and, in general, information related to the development of the Companies' corporate purpose; and, finally, to transfer personal data to third parties designated by the Companies for the provision of the services offered and the enforceability of the rights generated by virtue of the existing legal, contractual, or commercial relationship.

General processing and purposes of the information:

- Processing and confirmation of personal data.
- Providing services and/or products purchased directly or with the participation of third parties.

- Promoting and advertising our activities, products, and services.
- Performing accounting and administrative transactions arising from the ordinary course of business of the Companies.
- To file reports with the various national administrative control and surveillance authorities, police or judicial authorities, financial institutions, and/or insurance companies.
- Internal administrative and/or commercial purposes such as: market research, audits, accounting reports, statistical analysis, or billing.
- To make accounting records relating to operations carried out in the course of the Companies' business.
- Sending and receiving correspondence.
- Identifying fraud and preventing money laundering and other criminal activities.

With regard to information on shareholders and members of the Board of Directors:

- Control of share ownership and publication of the shareholders with the largest holdings in accordance with the regulations issued for this purpose by the Financial Superintendency of Colombia.
- Compliance with judicial decisions and administrative, legal, fiscal, and regulatory provisions.
- Compliance with legal obligations and exercise of rights arising from the status of shareholder and member of the Board of Directors of the Companies.
- Sending of information relating to the Companies, as well as notices of General Shareholders' Meetings and Board of Directors' Meetings.

With regard to information on suppliers and creditors:

- Compliance with court decisions and administrative, legal, tax, and regulatory provisions.
- Compliance with contractual obligations and enforceability of rights arising from the contractual relationship, for which reason the information may be transferred to third parties, such as financial institutions, notaries, restrictive lists for the prevention of money laundering and terrorist financing, lawyers, among others.
- Consultation of the supplier in restrictive lists for the prevention of money laundering and terrorist financing, criminal records, and other lists containing public information that is considered relevant for evaluating the suitability of the supplier for contracting.
- Carrying out accounting and administrative processes in which suppliers are involved.
- Transmission of information and personal data in audit processes.

- Collection, storage, and use of personal information of employees and contractors of suppliers for the purpose of complying with obligations arising from the existing contractual or legal relationship with them.
- Any other use that the supplier or creditor authorizes in writing for the use of their information.

With regard to customer and visitor information:

- Sending commercial, advertising, and marketing information.
- Compliance with contractual or legal obligations, for which information may be transferred to third parties, such as financial institutions, notaries, restrictive lists for the prevention of money laundering and terrorist financing, lawyers, among others.
- Compliance with judicial decisions and administrative, legal, fiscal, and regulatory provisions.
- Transmission of information and personal data in audit processes.
- Billing for goods and services provided by the Companies to customers.
- Access control and video surveillance of people visiting the Companies' facilities as a security measure.

Regarding information on employees, retired workers, pensioners, and candidates for vacancies:

- For purposes related to the employment relationship (affiliation and compliance with obligations arising from affiliation with EPS, ARL, pension and severance funds, family compensation funds, among others)
- Compliance with judicial, administrative, and legal requirements.
- Accounting and payroll.
- Recruiting and selecting personnel to fill vacancies, either directly or through third parties hired for this purpose.
- Processing, confirming, and complying with legal and extralegal employment obligations arising from the employment contract.
- Carrying out transactions.
- Payment of extralegal benefits.
- Conducting audits and evaluating the skills of our employees and candidates for vacancies.
- Consultation of employees and candidates for vacancies on restrictive lists for money laundering and terrorist financing - Statistical analysis.
- Develop training and education programs directly or through third parties hired for this purpose.

- Sharing personal data with banks and other companies that offer benefits and wellness programs to our active employees, among others.

With regard to employee and contractor data, the Companies will process biometric data for the purpose of controlling access to the headquarters and worksites developed by the Companies, where their employees and contractors provide services, as well as verifying compliance with the schedules established by the Companies within their working hours, and to calculate and settle social benefits. The provision of information corresponding to biometric data is optional, as it is considered sensitive.

The Companies recognize the importance of the security, privacy, and confidentiality of the personal data provided by individuals, and are therefore committed to its protection and proper handling, in accordance with the legal regime for the protection of personal data and, in particular, the provisions of this policy. For this reason, the information contained in the aforementioned databases will only be accessible to Company employees who, by virtue of their job functions, need to know and use it for the purposes indicated.

The Companies will keep the personal information of the data subjects in the aforementioned databases for as long as it is used to fulfill the purpose indicated in this policy. Once such use has ended, the information will be blocked in the Companies' information system, remaining only as historical data on the transactions carried out with the data subject, but no transactions or use of such data may be carried out. The foregoing is a security measure against possible fraud and is in accordance with the principle of integrity of the information system that the Companies have adopted for the purpose of managing their operations.

4. Rights of the Data Subject:

The Data Subject is a natural person whose personal data is collected, stored, or used by the Data Controller. The Data Subject shall have the following rights:

- a) To know, update, and rectify your personal data with the Data Controller when the data is partial, inaccurate, incomplete, fragmented, or misleading. In any case, the Owner undertakes to provide truthful information.
- b) To request proof of the authorization granted to the Data Controller, unless expressly exempted as a requirement for processing.
- c) To be informed, upon request addressed to the data controller, regarding the use that has been made of their personal data.

- d) To file complaints with the Superintendency of Industry and Commerce for violations of the provisions of Law 1581 of 2012 and its regulatory decrees and other regulations that modify, add to, or complement it.
- e) Revoke authorization and/or request the deletion of data when the principles, rights, and constitutional and legal guarantees are not respected in the Processing, provided that the Owner does not have a legal or contractual obligation to remain in the database.
- f) Access, free of charge, your personal data that has been processed by the Data Controller.

5. Procedure for inquiries, data updates, and complaints:

Inquiries: Data subjects or their successors may consult the personal information of the data subject stored in the Companies' database.

The query must be made in writing, either by letter addressed to Ana Isabel Villegas García, at Carrera 43A No. 18 Sur-135. Sao Paulo Plaza, or by email to habeasdata@conconcreto.com

The query will be answered within a maximum of ten (10) business days from the date of receipt. When it is not possible to answer the query within this period, the interested party will be informed, stating the reasons for the delay and indicating the date on which the query will be answered, which in no case may exceed five (5) business days following the expiration of the first period.

Complaints: The Owner or their successors who consider that the information contained in the Conconcreto S.A. database should be corrected, updated, or deleted, or when they notice the alleged breach of any of the duties contained in this document or in the law, may file a complaint.

The claim shall be made by sending a request to Ana Isabel Villegas García at Carrera 43A No. 18 Sur-135, Sao Paulo Plaza, or by email to habeasdata@conconcreto.com , which must include: the name and identification of the Owner, a description of the events giving rise to the claim, the address, email address, and any supporting documents.

If the claim is incomplete, the interested party will be required to correct the deficiencies within five (5) days of receipt of the claim. If two (2) months have elapsed since the date of the request and the applicant has not submitted the required information, it will be understood that they have withdrawn the claim.

Once the complete claim has been received, a note stating "claim pending" and the reason for the claim will be included in the database within two (2) business days. This note must remain until the claim is decided.

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

Requirement for admissibility. The owner or successor may only file a complaint with the Superintendency of Industry and Commerce once they have exhausted the consultation or complaint process with the companies.

6. Data collected prior to the issuance of Decree 1377 of 2013:

For data collected prior to the issuance of Decree 1377 of 2013, the Companies have informed the Data Subjects of their information processing policies and how to exercise their rights by publishing them on the website www.conconcreto.com.

If, within thirty (30) days after the publication of the privacy notice on the website, the Data Subject has not contacted the controller to request the correction, deletion, or authorization of their personal data, the Companies will continue to process the data contained in their databases for the purposes indicated in the privacy notice.

7. Modifications to privacy policies:

The Companies reserve the right to make changes or updates to this Privacy Policy at any time, in order to comply with new legislation, internal policies, or new requirements for the provision or offering of their services or products. These changes will be made available to the public on the website www.conconcreto.com.

8. Acceptance:

The owners of the information accept the processing of their personal data in accordance with the terms of this policy at the time of providing their data.

9. Validity:

This General Privacy Policy is effective from the date of its publication in May 2017.