

CONSIDERING

That, in accordance with the importance of the right of all individuals to know, update, and correct data and information collected in databases of a constitutional nature, recognized within the body of Law 1581 of 2012, and subsequently regulated by Decree 1377 of 2013, COMPETENCIA HUMANA SAS, a consulting company in human talent management and the provision of services and products in human talent, it is our duty to make these guarantees effective in favor of each of the holders of the information, being responsible for the treatment of personal data and sensitive data of its clients, collaborators, former collaborators, candidates, former - candidates, providers, service providers, and in general any natural person of whom information is held. COMPETENCIA HUMANA SAS has adopted the following Information Processing Policies, to ensure that the treatment of personal data and sensitive personal data complies with current legal provisions.

CHAPTER I: DATA PROCESSING RESPONSIBLE

COMPETENCIA HUMANA SAS, identified with NIT 90030394-1 and trade registration number 01493032 of June 22, 2005 and its main address in this city, is responsible for the processing of personal data and sensitive personal data of its clients, collaborators, former collaborators, candidates, former - candidates, providers, service providers, and in general any natural person of whom information is held.

CAPITULO II: POLÍTICA DE TRATAMIENTO DE DATOS PERSONALES

Second. COMPETENCIA HUMANA SAS, by virtue of its corporate purpose, has obtained and preserved since its creation, personal data and sensitive personal data of its clients, collaborators, former collaborators, candidates, former - candidates, providers, service providers, and in general any natural person of whom information is held; henceforth the holders, which are collected, stored, organized, used, transmitted, updated, corrected and generally administered, according to the respective relationship and / or link (civil, labor, commercial) applying the policies defined in the following articles.

Third. COMPETENCIA HUMANA SAS is committed to providing the proper use and treatment of personal data and sensitive personal data of its holders, avoiding unauthorized access to third parties that allows knowledge, violation, modification, disclosure and / or destruction of the information, except for express authorization of the holder, for which it has information security policies that include mandatory compliance control measures.

Fourth. COMPETENCIA HUMANA SAS requests from the holders of the information the necessary data for the development of selection processes, evaluation, safety studies, telework studies, hiring, labor or commercial linkage and / or personnel maintenance according to the request of the interested companies. For its collection and verification, the authorization of the holder will be necessary, who will be informed of the process for which the data is being collected.

Fifth. Except for the exceptions provided by law, the treatment of personal data and sensitive personal data can only be carried out with the prior, express and informed consent of its holders.

Sixth. COMPETENCIA HUMANA SAS, by virtue of its corporate purpose, will process the request for revocation of the authorization for the treatment of personal data and sensitive personal data and / or its suppression, of the data registered in our databases and / or files, situation that will not be appropriate when the holder who requests it has the legal or contractual duty to remain in them.

Seventh. COMPETENCIA HUMANA SAS will request from its clients, collaborators, candidates, providers, service providers and in general any natural person of whom information is held; the personal data and sensitive personal data necessary to establish the respective relationship and / or link (civil, labor, commercial). The sensitive information required will be of free and voluntary delivery by the respective holder, who must grant his consent and authorization for its respective treatment.

Eighth. COMPETENCIA HUMANA SAS will ensure the respect and compliance of the fundamental rights of children, observing the special requirements established for the treatment of their personal data and sensitive personal data.

Ninth. The treatment of personal data and sensitive personal data provided by the holders of COMPETENCIA HUMANA SAS, will be carried out in accordance with the principles of legality, consent, information, quality, purpose, loyalty, proportionality and accountability established in the current regulations on the matter.

Tenth. COMPETENCIA HUMANA SAS will carry out the updating, rectification and suppression of personal data and sensitive personal data when the respective holder so requests, as well as providing the right of access to the information, in the terms provided by law.

Eleventh. The holders of personal data and sensitive personal data of COMPETENCIA HUMANA SAS, may exercise the rights of access, consultation, rectification, suppression, opposition, revocation of the authorization and claim, in accordance with the provisions of the current regulations on the matter.

Twelfth. COMPETENCIA HUMANA SAS will apply the measures of security, administrative, technical and physical necessary to protect the personal data and sensitive personal data of its holders against damage, loss, alteration, destruction, unauthorized use or

- Selection and study of profiles to apply to the various job offers that COMPETENCIA HUMANA SAS may require for itself or for its clients, advance hiring and civil, commercial or labor linkage processes.
- Respond to requests to control entities.
- For sending information, via email, text messages (SMS and / or MMS) or any other means of communication about job offers to which you can apply.

- Supply of information to competent authorities if required.
- In general for any other purpose that derives from the legal nature of COMPETENCIA HUMANA SAS

CHAPTER III: Responsible for Handling Requests, Inquiries and Complaints

Chapter IV: Responsible for Handling Requests, Inquiries and Complaints

Thirteenth. The information security area is responsible for carrying out the necessary actions for the exercise of the rights of the owner. It will handle and manage requests by sending a written request in physical form to Cra. 11 n. 90-07 Of 602 in the city of Bogotá.

Fourteenth. Users, in their capacity as owners of personal and sensitive personal data, may manage their inquiries or complaints through the Information Security area of COMPETENCIA HUMANA SAS.

Fifteenth. Inquiries or complaints must be submitted by the data owner or their legal representative. Consequently, COMPETENCIA HUMANA SAS reserves the right to verify the identity of the petitioner through the means it has established.

Sixteenth. The request must contain the required personal information (name and contact information to receive the response), a description of the events that give rise to the complaint, and the documents necessary to exercise the right as the data owner.

Seventeenth. COMPETENCIA HUMANA SAS will respond to the petitioner within the terms established by Law 1581 of 2012.

Eighteenth. Regardless of the mechanism used to file inquiries, they will be addressed within a maximum of ten (10) working days from the date of receipt. When it is not possible to answer the inquiry within this period, the interested party will be informed, stating the reasons for the delay and indicating the date on which their inquiry will be answered, which in no case may exceed five (5) working days after the expiration of the first term.

Nineteenth. The data owner or their heirs who believe that the information contained in a database should be corrected, updated, or deleted, or when they notice the alleged breach of any of the duties included in this law, may submit a claim to the data controller or the data processor, which will be processed under the following rules:

- a.** The claim will be made by means of a request addressed to the data controller or data processor, with the identification of the data owner, a description of the events that give rise to the claim, the address, and attaching the documents to be relied upon. If the claim is incomplete, the interested party will be required within five (5) days of receipt of the claim to remedy the defects. If the required information is not presented within two (2) months from the date of the request, it will be understood that the claimant has waived the claim.

b. If the person who receives the claim is not competent to resolve it, they will transfer it to the appropriate person within a maximum of two (2) working days and will inform the interested party of the situation.

c. Once the complete claim has been received, a legend will be included in the database stating "claim in process" and the reason for this within a maximum of two (2) working days. This legend must be maintained until the claim is decided.

d. The maximum term for resolving the claim will be fifteen (15) working days from the day after the date of its receipt. When it is not possible to address the claim within this period, 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) working days after the expiration of the first term.

Twentieth. This policy takes effect on April 22, 2020 and its validity is subject to the purpose of processing personal data inherent to the legal nature of the company COMPETENCIA HUMANA SAS.