

**DATA PROTECTION
POLICY**



GRUPO ARGOS

Investments that transform

GRUPO ARGOS S.A. (hereinafter GRUPO ARGOS) is a Colombian company identified with NIT 890.900.266-3 in compliance with the provisions of Law 1581 of 2012 and its regulatory decree number 1377 of 2013, which regulates personal data protection and establishes the legal guarantees that must be complied for all persons in Colombia for properly processing any such data, and therefore develops the following policy for the processing of personal data within the Company. The terms used in this Policy with an initial capital letter shall be defined as established in Annex No. 1 "Definitions".

1. PRINCIPLES APPLICABLE TO THE PROCESSING OF PERSONAL DATA

The protection of personal data in GRUPO ARGOS will be subject to the following rules, and therefore will determine and interpret the internal actions related to processing the personal data in a harmonious, integral and systematic way to resolve the conflicts that may arise on this matter. These are principles enshrined in international standards, in Colombian laws and in the jurisprudence of the Constitutional Court that has developed the fundamental rights linked to personal data.

1.1. Informed consent or principle of Freedom.

The processing of personal data within GRUPO ARGOS can only be done with prior, express and informed consent by the holder. Personal data cannot be obtained, processed or disclosed without the authorization of the holder, except legal or judicial mandate that supposes the express consent of the holder.

1.2. Legality.

The processing of personal data in Colombia is a regulated activity and therefore the business processes and recipients of this rule must be subject to the provisions of this regulation.

1.3. Purpose of the Data.

The processing of personal data must obey a legitimate purpose, in accordance with the Constitution and the law, which must be informed previously in a concrete and accurate manner to the holder so that informed consent is expressed.

1.4. Quality or authenticity of the data.

The personal data collected by GRUPO ARGOS must be true, complete, accurate, verifiable, understandable and kept up-to-date. The processing of partial, incomplete or misleading data is prohibited.

1.5. Transparency.

In the processing of personal data, the holder will be guaranteed the right to obtain and know the person responsible and / or in charge of processing the information about the existing data concerning them.

When collecting personal data on GRUPO ARGOS' behalf, the purpose of the Processing and / or the database must be taken into account; therefore, the information must be appropriate, relevant data and not excessive or disproportionate in relation to the purpose. Collecting disproportionate personal data in relation to the purpose for which it is intended is prohibited.

1.6. Access and Restricted Circulation.

The personal data collected or processed by GRUPO ARGOS will be used by this company or its affiliates only within the scope of the purpose and authorization granted by the holder of the Personal Data, therefore, it will only be transferred to third parties that require this data for the provision of any service to GRUPO ARGOS that is necessary and that has the same purpose that GRUPO ARGOS is giving to such personal data.

The Holder, through Authorization, will empower GRUPO ARGOS to Transfer and assign the personal data for the purposes it was authorized, to those in charge of Processing it or its related parties. Personal data under the custody of GRUPO ARGOS may not be available on the Internet or any other means of mass disclosure, unless access is technically controllable and secure, and such access is intended to provide restricted knowledge only to authorized holders or third parties in accordance with the provisions of the law and the principles governing the matter.

Exempt from the aforementioned are the events in which by express legal provision such data must be disclosed in mass media such as the Internet or through prior authorization by the holder of the information.

1.7. Nature of the data.

Once the purpose for which the Personal Data was collected has been completed, GRUPO ARGOS must cease its use and therefore adopt the pertinent measures to ensure its elimination. For this purpose, the obligations of commercial law regarding the conservation of commercial books and correspondence of the merchant shall be taken into account.

However, if considered necessary, the data may remain in the GRUPO ARGOS Databases should it be required to comply with a legal duty or court order, as well as when its processing is limited to preservation for historical or statistical purposes.

1.8. Data Security.

GRUPO ARGOS, being the One in Charge or Responsible for the Processing of personal data, as the case may be, will adopt the necessary physical, technological and / or administrative security measures to guarantee the integrity, authenticity and reliability of the personal data. GRUPO ARGOS, according to the classification of the personal data made within the organization, will implement the security measures of high, medium or low level, applicable as the case may be, in order to avoid adulteration, loss, leakage, consultation, unauthorized or fraudulent use or access.

1.9. Confidentiality.

GRUPO ARGOS and all persons involved in the processing of personal data, have the professional obligation to keep and maintain the reserve of such data, except for legal exceptions. This obligation subsists even after the relationship that gave way to the data collection and processing ends. GRUPO ARGOS will implement, in its contractual relations, data protection clauses in this regard.

1.10. Duty of Information.

GRUPO ARGOS will inform the holders of the personal data about the data protection regime adopted by the organization, as well as the purpose and other principles that regulate the processing of this data. Likewise, it will inform about the existence of the Personal Databases that are under custody, the rights and the exercise of the habeas data law by the holders, proceeding to the registration required by law.

1.11. Special protection of sensitive data.

GRUPO ARGOS will not collect or process personal data linked exclusively to political ideologies, union affiliation, religious beliefs, sexual life, ethnic origin and / or health data, unless expressly authorized by the holder or by express legal provision.

No activity of GRUPO ARGOS, will be conditioned to the Holder providing sensitive personal data, except when it is imperative to benefit the holder of the information or because the specific situation requires so.

2. RIGHTS OF THE DATA HOLDERS

The holders of the personal data contained in Databases that remain in the information systems of GRUPO ARGOS, have the rights described in this section in compliance with the fundamental guarantees enshrined in the Political Constitution and the Law.

The exercise of these rights may be performed by the Personal Data Holder, in accordance with the legal provisions that regulate the exercise thereof. For the exercise of these rights, the Data Holder may contact the company through written communication addressed to the following email address protecciondedatos@grupoargos.com or written document addressed to the following address Carrera 43ª No. 1ª sur- 143. Torre Norte. Piso 1., in the city of Medellin.

The exercise of Habeas Data, expressed in the following rights, constitutes a very personal power and will be solely exercised by the holder of the data, unless under law exceptions.

2.1.Right of Access.

This right includes the freedom of the Data Holder to obtain all the information regarding their own personal data, whether partial or complete, of the processing applied to them, of the purpose for processing, the location of the databases that contain their personal data, and on communications and / or assignments made regarding them, whether authorized or not.

Access to personal data that has been processed is guaranteed free of charge once a month or whenever there are substantial changes to these information processing policies that motivate new inquiries. For inquiries whose term is greater than one for each calendar month, the company may charge the holder the costs of shipping, reproduction and, when appropriate, certification of documents.

2.2. Right of Update.

This right includes the freedom of the Data Holder to update their personal data when there has been some type of variation.

2.3.Right of Rectification.

This right allows the data holder to request the modification of any data that proves to be inaccurate, incomplete or non-existent.

2.4.Right of Cancellation.

This right includes the Data Holder's right to cancel their personal data or delete them when they are excessive, not pertinent, or if the processing is contrary to the rules, except in those cases contemplated as exceptions by law, or when it is kept in reason of an existing contractual or commercial relationship.

2.5.Right to the annulment of Consent.

The Holder of the personal data has the right to revoke the consent or Authorization that allows GRUPO ARGOS to Process with a specific purpose, except in those cases contemplated as exceptions by law and / or as necessary in a specific contractual framework.

2.6.Right of Opposition.

This right includes the freedom of the Data Holder to oppose the processing of their personal data, except in cases where such right does not proceed by legal provision or by violating general interests higher than the individual interest. GRUPO ARGOS, based on the legitimate rights argued by the Personal Data Holder, will make a fair judgment in order to determine the pre-eminence or not of the individual right of the data holder on other rights.

2.7.Right to le Complaints or to exercise Actions.

The Personal Data Holder has the right to submit to GRUPO ARGOS inquiries and claims in accordance with the laws that regulate them and complaints to the Superintendency of Industry and Commerce agency, or the entity that is competent. GRUPO ARGOS will respond to the requirements made by the competent authorities in relation to the rights of the personal data holders.

2.8.Right to grant Authorization for data processing.

This right includes the freedom of the Data Holder to update their personal data when there has been some type of variation.

Within the principle of informed consent, the Data Holder has the right to grant their Authorization, by any means that may be subject to further consultation, to process their personal data in GRUPO ARGOS.

Exceptionally, this Authorization will not be required in the following cases:

- When the Data is required or must be delivered to a public or administrative entity in compliance with its legal functions, or by judicial order.
- In case the data is of public nature.
- In cases of medical or health emergency.
- When processing information authorized by law for historical, statistical or scientific purposes.
- When dealing with personal data related to the Civil Registry of persons.

In these cases, although the Holder's Authorization is not required, the other principles and legal provisions on the protection of personal data will apply.

3. GENERAL POLICY

For the protection of personal data and its processing, the general goal for GRUPO ARGOS is to ensure the confidentiality, integrity, freedom, authenticity, transparency and availability of the information and databases of its shareholders, suppliers, applicants, employees and former employees, guaranteeing availability of the technological infrastructure for the processing of personal data collected for legal, contractual, and commercial purposes.

For this purpose, GRUPO ARGOS undertakes to comply with the current regulations, always seeking effective procedures for protecting the rights of the personal data holders, and will manage and develop measures that contain appropriate security conditions to avoid adulteration, loss, consultation, use or fraudulent access to information.

In the Data Processing Authorization that each case requires, it shall be indicated that the data can be transferred to entities that will fulfill the function of managers in the terms established by Law 1581 of 2012 or those related to the organization. GRUPO ARGOS Data Base Administration Managers must fully comply with this Data Protection Policy.

4. SPECIFIC POLICIES FOR THE PROCESSING OF PERSONAL DATA

The operations that constitute the processing of personal data by GRUPO ARGOS, as the one in charge, shall be ruled under the following parameters.

4.1. Personal Data related to Human Resources Management.

There will be independent databases for the processing of personal data, before, during and after the employment relationship.

4.1.1. Data Processing before the Contractual Relationship.

GRUPO ARGOS will inform, in advance all those interested in participating in a recruitment process, of the rules applicable to the processing of personal data provided by the interested party, as well as those obtained during the recruitment process.

When GRUPO ARGOS contracts with third parties to advance on or support the recruitment processes, within the respective contracts, it will be established that the collected personal data must be processed in compliance with this Data Protection Policy.

The purpose of the delivery of the data provided by the interested parties in the job opening of GRUPO ARGOS and the personal data obtained from the recruitment process, is limited to the information related to their participation in it; therefore, its use for different purposes is prohibited.

4.1.2. Data Processing during the Contractual Relationship

GRUPO ARGOS will store the personal data obtained during the employee recruitment process in a folder with the name of each of them. This physical or digital folder will only be accessed and processed by the Human Resources and Administrative Management Department and with the purpose of managing the contractual relationship between GRUPO ARGOS and the employee.

The use of employee information for purposes other than those established in the employment contract and the authorizations that are signed for this purpose is prohibited in GRUPO ARGOS. The different uses of the personal data and information of the employees will only proceed by order of the competent authority, provided that it has such power. GRUPO ARGOS will evaluate the competence and effectiveness of the order of the competent authority, in order to prevent an unauthorized transfer of personal data.

For the purposes of Processing sensitive personal data collected during the employment relationship, an express authorization from the Holder will be required, therefore it must be informed of the Sensitive Data that will be subject to the processing and its purpose.

For external services GRUPO ARGOS may require, that in the processing of data during the contractual relationship, it be transferred to a third party if necessary, in order for it to be in charge of the processing administration. In this case, within the employee Authorization the data transfer will be included.

4.1.3. Processing of Data after the Contractual Relationship Has Ended.

After the employment relationship, whatever the cause, GRUPO ARGOS will proceed to store the personal data obtained from the recruitment process and documentation generated in the development of the employment relationship, in a central le, submitting such data to measures and high levels of security, by virtue of the potential Sensitive Data that the work related information may contain.

The personal data of former employees are kept exclusively for the fulfillment of the following purposes:

- Comply with Colombian or foreign law and the orders of judicial, administrative or private entities in the exercise of public services.
- Issue certifications related to the relationship of the data holder with the company.
- Statistical or historical purposes.

4.2. Processing of Personal Data of Shareholders.

The personal data and information of the natural persons that come to have the status of shareholder of Grupo Argos, will be considered reserved information, since it is registered in the commercial books and has the character of reserved by legal mandate. However, the data will be disclosed in the cases established by the rules that regulate the public securities market.

Consequently, access to such personal data will be done in accordance with the provisions of the Commercial Code and other regulations that regulate the matter.

The purposes for which the personal data of the shareholders will be used are the following:

- Allowing the development of duties and rights derived from the status of shareholder.
- Sending invitations to events scheduled by the Company;
- Issuance of certifications relative to the relation of the data subject with the Company;
- The others established in the authorizations that are granted by the shareholders themselves.

4.3. Processing Personal Data of Suppliers.

GRUPO ARGOS will only collect from its suppliers the data that is necessary, pertinent and not excessive for the purpose of selection, evaluation and execution of the contract that may take place. When GRUPO ARGOS is required by legal nature to disclose the data of the natural person as a result of a contracting process.

This will be done with the provisions that comply with the regulations and which prevent third parties from disclosing the information.

The purposes to use the personal data of suppliers will be:

- Sending invitations to contract and carry out procedures for the pre-contractual, contractual and post-contractual stages.
- Sending invitations to events scheduled by the Company or its related parties
- The others specifically established in the authorizations that are granted by the suppliers themselves, when these are required in accordance with current regulations or in accordance with Law 1581 of 2012.

Grupo Argos may collect personal data from employees of its suppliers when, for security reasons, it must analyze and evaluate the suitability of certain persons, taking into account the characteristics of the services contracted with the supplier.

The collection of the personal data of employees of the suppliers by GRUPO ARGOS, will have as a purpose to verify the moral suitability and competence of the employees; Therefore, once this requirement has been verified, GRUPO ARGOS will return such information to the supplier, except when its conservation is expressly authorized.

When GRUPO ARGOS delivers personal data of any Holder to its suppliers, they must protect the personal data provided, in accordance with the provisions of current regulations. For this purpose, the corresponding audit forecast in the contract or document that legitimates the delivery of personal data will be included. GRUPO ARGOS will verify that the requested data is necessary, pertinent and not excessive regarding the purpose that bases the request for access to them.

5. RECORDINGS, FILMS AND COMMUNICATIONS

As part of the company's communication strategy, it has provided its shareholders', clients' and users with a website and different other ways to make contact, such as written communications, telephone contact, newsletters and press releases.

It may publish images, references, articles or communications of company employees, its customers or attendees at events organized or sponsored by GRUPO ARGOS.

Such information and data will in no way be used or shared with third parties for commercial purposes or activities other than to announce the activities and services of GRUPO ARGOS or its related parties. The company undertakes to carefully review the information that will be published so that in no way will it threaten the dignity, privacy or good name of any of the persons that may appear in its communications.

Any data delivered by the holders in any way, does not constitute the company's intellectual property or moral rights over it. The intellectual property rights will remain the owner's.

Likewise, the transfer of rights of images, photographs or videos and / or filmed in a work and / or professional relationship with GRUPO ARGOS, and in general the other shared personal data, through any means of dissemination and communication does not give way to any rights for receiving compensation or recognition of any kind, since the authorization and assignment of rights are performed free of charge.

6. DATA OF UNDERAGE PERSONS

The company does not carry out the processing of personal data of minors in any of its activities. However, if for any reason it is necessary to carry out the processing of the information, their prevailing interests will be taken into account and in no way, will it be done without prior authorization from their legal guardians.

7. MODIFICATIONS TO POLICIES

The Company reserves the right to modify the Personal Data Protection policy at any time. Any modification will be communicated in a timely manner to the Holders of the data through the usual means of contact and / or through its website within ten (10) business days before going into effect. In case of not agreeing, for valid reasons and which may constitute a fair cause, with the new policies of processing personal data the holders of the data or their representatives may request the company to withdraw their information through the channels indicated aforementioned, however you cannot request the withdrawal of data while maintaining a relationship of any kind with the company.

8. LAW, JURISDICTION AND VALIDITY

Any interpretation, judicial or administrative action derived from the processing of personal data that make up the databases of the company and this policy will be subject to the rules of personal protection established in the Republic of Colombia and the administrative or jurisdictional authorities responsible for the resolution of any concern, complaint or demand on them will be those of the Republic of Colombia. On the other hand, in general, the information of our Databases will remain processed while a legal or contractual relationship with the Holder of the data is maintained. In any case, in general, the information will not be subject to Processing for a period greater than twenty (20) years as of its collection, in accordance with legal or contractual circumstances that make it necessary to process the data, without damages that, in any case, are maintained if necessary to comply with statistical, historical or any legal obligation.

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Annex No. 1

DEFINITIONS

Human Resources and Administrative Management Department: Department responsible for managing the human resources and administrative processes of the Company.

Authorization: Prior, express and informed consent of the Holder to carry out the processing of personal data.

Notice of Privacy: A document generated by the Responsible party, which is provided for the Holder for the processing of their personal data, in case of not being able to provide the privacy policy to them.

In general GRUPO ARGOS provides all its employees, clients, shareholders, users and in general holders of personal data its Personal Data policy, which is easily accessible through its website www.grupoargos.com. However, if the implementation of this notice is necessary for a given communication channel, it must contain, at least, the information regarding the existence of the Data Processing policies that will be applicable to it and the characteristics of the Processing that is intended with the data.

Database: Organized set of personal data that is subject to processing, regardless of whether these are structured or not.

Company: Grupo Argos S.A.

Personal Data: Any information linked to or associated with one or several natural persons determined or determinable. Personal data can be public, semi-private or private.

Private Data: It is data that due to its intimate or reserved nature is only relevant for the holder, as is the case of biometric data and health records, among others. This type of data is not subject to processing by GRUPO ARGOS, unless it is information necessary for the development of a project of its corporate purpose or is the internal management of the information of its officials, with prior authorization on their part, in case of being necessary.

Public Data: Is data considered as such according to the mandates of the law or the Constitution and everything else that is not semi-private or private-public, among others. The data contained in public documents, judicial sentences duly executed that are not subject to reservation and everything related to the civil status of the persons.

In accordance with the concepts established by the Superintendence of Industry and Commerce agency, directory data or that is found on Internet browsers cannot be considered public and their processing must be based on the principles of personal information management.

Semi-private Data: It is data that does not have an intimate, reserved, or public nature and whose knowledge or disclosure may be of interest, not only to its owner, but to a certain sector or group of people, or to society in general, such as the one related to compliance with the obligations recorded in the credit risk centers.

Sensitive Data: Data that affects the privacy of the Holder or that its 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 organizations or promote the interests of any political party or guarantee the rights and guarantees of opposition political parties, as well as data related to health and sexual life.

This type of data may be subject to processing by GRUPO ARGOS, with the prior authorization of its employees, clients or shareholders.

Person Responsible for Processing: Natural or legal person, public or private, that by themselves or in association with others, performs the processing of personal data on behalf of the Processing Manager.

External Fraud: Acts, performed by an external person, who seek to defraud, improperly appropriate assets or information for their own benefit or that of a third party, or breach rules or laws.

Internal Fraud: Acts that intentionally seek to defraud or improperly appropriate the company's assets, confidential information belonging to GRUPO ARGOS, or breach rules or laws, where at least one company official is involved in benefiting themselves or a third party.

National Registry of Databases: Public directory of the databases subject to processing in the Colombian territory. The databases that are outside the Colombian territory, if any, will be registered when GRUPO ARGOS or those in charge of processing are applicable to Colombian legislation, by virtue of internal norms or international treaties.

Person Responsible for processing: Natural or legal person, public or private, that by itself or in association with others decides on the database and/or the Treatment of the data.

Superintendence of Industry and Commerce agency: National authority for the protection of personal data, through the Delegation for the Protection of Personal Data.

Holder of the information: Natural person whose personal data are subject to Processing.

Transfer: When the Person Responsible for Processing the personal data, located in Colombia, sends the information or personal data to a recipient, who in turn is responsible for the processing, which is located inside or outside the country.

Transmission: Processing of personal data that implies its communication inside or outside the territory of the Republic of Colombia, when processing is done by the Manager on behalf of the Person Responsible.

Processing: Any operation or set of operations on personal data, such as collection, storage, use, circulation or removal.