

## **Personal Data Protection and Privacy Policy**

This policy aims to recognize and protect the right of all individuals to know, update, and correct information collected about them in Q-Vision databases or files that are subject to management.

Information of the company responsible for personal data processing:

- Company Name: QUALITY VISION TECHNOLOGIES S.A.S
- Location: Medellín
- Mailing Address: Carrera 43A No 7-50A Office 1102
- Email: servicioalcliente@qvision.us
- Phone: (57 4) 444 40 14

### **Management of Personal Data and Purpose**

QUALITY VISION TECHNOLOGIES S.A.S will manage personal information through collection, storage, use, and circulation of personal data for marketing, commercial, and service activities; as well as for employment and social security purposes for employees, former employees, and future employees.

### **Rights of Data Owners**

In accordance with Article 8 of Law 1581 of 2012 and Decree 1377 of 2013, data owners have the following rights with respect to QUALITY VISION TECHNOLOGIES S.A.S:

- a) To know, update, and correct their personal data with QUALITY VISION TECHNOLOGIES S.A.S as the data controller.
- b) To request proof of authorization granted to QUALITY VISION TECHNOLOGIES S.A.S as the Data Controller.

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- c) To be informed by QUALITY VISION TECHNOLOGIES S.A.S, upon request, regarding the use of their personal data.
- d) To file complaints with the Superintendence of Industry and Commerce for violations of Law 1581 of 2012 after exhausting consultation or claim procedures with the Data Controller.
- e) To revoke authorization and/or request deletion of data if its processing does not comply with constitutional and legal principles, rights, and guarantees.
- f) To access, free of charge, their personal data that has been processed.

### **Management of Sensitive Data**

QUALITY VISION TECHNOLOGIES S.A.S will limit itself to managing relevant and appropriate personal data in accordance with the current regulations. Unless expressly authorized by law, personal data may not be collected without the data owner's consent.

The managing of personal data collected and stored by QUALITY VISION TECHNOLOGIES S.A.S will be as follows:

- a) To fulfill the corporate purpose of QUALITY VISION TECHNOLOGIES S.A.S according to its legal statutes.
- b) To carry out commercial activities such as direct mail, social media campaigns, event invitations, service evaluation measurements, among others.
- c) To comply with applicable tax and commercial regulations.
- d) To fulfill obligations related to employment and social security (health, pension, occupational risks, and social contributions), applicable to former employees, current employees, and future job candidates.
- e) To fulfill service delivery and commitments made with clients, suppliers, and employees.
- f) To carry out Due Diligence and Compliance verifications, in accordance with the Legal Basic Circular from the Superintendency of Companies.

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## **Exercise and Procedure for Exercising Habeas Data Rights**

Law 1581 of 2012 grants all personal data holders a series of guarantees, giving them control over the information that concerns them. Additionally, it acts as a complement to the duty of the data controller to fulfill the obligations imposed by law, identifying cases where management may not be aligned with these regulations.

The following individuals may exercise these rights in accordance with Article 14 of Law 1581 of 2012 and Decree 1377 of 2013: data owners, their representative, or attorney. When a request is made by someone other than the data owner and does not prove representation, the request will be considered invalid.

QUALITY VISION TECHNOLOGIES S.A.S has an administrative infrastructure to ensure proper handling of requests, inquiries, complaints, and claims related to data protection, guaranteeing the exercise of rights established in the Constitution and law, especially the right to know, update, correct, and delete personal information; as well as the right to revoke consent for personal data management.

### **Right of Access**

The data owners ability to control and access their personal information implies the right to know whether their data is being managed, as well as the scope, conditions, and generalities of such management. QUALITY VISION TECHNOLOGIES S.A.S guarantees the right of access, once the data owner's identity or representative status is verified, by providing free electronic access to their personal data.

### **Inquiries**

QUALITY VISION TECHNOLOGIES S.A.S guarantees the right to inquiries, providing data owners with all information contained in the individual record or linked to their identification.

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For personal data inquiries, QUALITY VISION TECHNOLOGIES S.A.S provides electronic and telephone communication channels.

### **Claims**

QUALITY VISION TECHNOLOGIES S.A.S guarantees the right to claim, allowing data owners to request correction, update, or deletion of their data, or to report possible non-compliance with Law 1581 of 2012 and other applicable regulations.

In compliance with personal data protection regulations, QUALITY VISION TECHNOLOGIES S.A.S presents the procedure and minimum requirements for exercising your rights:

To submit and process your request, please provide the following information:

- Full name
- Contact details (physical and/or email address and contact phone numbers)
- Means to receive a response to your request
- Reason(s)/facts leading to the claim with a brief description of the right you wish to exercise (to know, update, rectify, request proof of the authorization granted, revoke it, delete, or access information)
- Signature (if applicable) and identification number.

If the claim received lacks the complete information needed to process it, such as the data owner identification, description of the facts giving rise to the claim, or address, the interested party will be requested within five (5) days of receipt to correct the deficiencies. If the required information is not provided within two (2) months from the date of the request, the claim will be considered withdrawn.

The maximum time allowed by law to resolve your claim is fifteen (15) business days from the day after it is received. If the claim cannot be addressed within this time frame, QUALITY VISION TECHNOLOGIES S.A.S will inform the interested party of the reasons for the delay and the date on which the claim will be resolved, which in no case will exceed eight (8) additional business days after the expiration of the initial period.

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Once the terms set by Law 1581 of 2012 and any supplementary or regulatory norms are met, the data owner who is denied, fully or partially, the exercise of the rights of access, update, rectification, deletion, and revocation may bring their case to the Superintendence of Industry and Commerce – Delegation for Personal Data Protection.

### **Data Rectification and Update**

QUALITY VISION TECHNOLOGIES S.A.S is obligated to rectify and update data upon request by the data owner, following the policies and terms outlined above.

### **Data Deletion**

Data owners have the right to request the deletion of their personal data when:

- a) They believe the data is not being managed according to legal principles, duties, and obligations as stated in Law 1581 of 2012.
- b) The data is no longer necessary or relevant for the purpose for which it was collected.
- c) The period necessary for fulfilling the purposes for which the data was collected has expired.
- d) This deletion involves the total or partial removal of personal information according to the data owner request in records, files, databases, or management activities carried out by QUALITY VISION TECHNOLOGIES S.A.S. It is important to note that the right to deletion is not absolute, and the data controller may deny its exercise when:

✓ The deletion request will not be applicable if the data owner has a legal or contractual duty to remain in the database.

✓ Data deletion would hinder judicial or administrative actions related to tax obligations, criminal investigation and prosecution, or the update of administrative sanctions.

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✓ The data is necessary to protect the legally protected interests of the data owner; to perform an action in the public interest, or to fulfill a legally acquired obligation by the data owner.

If data deletion is feasible, QUALITY VISION TECHNOLOGIES S.A.S will proceed to delete the data in a way that prevents information recovery.

### **Revocation of Authorization**

Data owners may revoke their consent for the management of their personal data at any time, provided it is not prevented by a legal provision. In this way, QUALITY VISION TECHNOLOGIES S.A.S must completely cease managing the data of the data owner. However, it may continue with certain types of managing, such as for market research purposes.

### **Handling Requests, Inquiries, and Claims**

The compliance department is responsible for handling data owners requests to enforce their rights. They can be reached at [servicioalcliente@qvision.us](mailto:servicioalcliente@qvision.us) or by phone at (574) 444 40 14 in Medellín.

### **Privacy and Personal Information Use Policies**

The purpose of this policy is to ensure the protection of the information of our stakeholders (both internal and external) and other parties that interact with QUALITY VISION TECHNOLOGIES S.A.S through the following strategies.:

- a) Storing and retaining authorization copies provided by the data owner.
- b) Informing data owners clearly about the purpose of data collection and their rights under the authorization.
- c) Ensuring full exercise of habeas data rights.
- d) Providing information upon request on how personal data is used.

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- e) Upholding principles of truthfulness, quality, security, and confidentiality.
- f) Safeguarding data against unauthorized access or use.
- g) Updating and correcting personal data when necessary.
- h) To rectify personal data when applicable.
- i) QUALITY VISION TECHNOLOGIES S.A.S will establish circumstances and requirements for secure remote connections to its technological platform.

### **Validity**

The databases in which personal data is recorded will be retained as long as deletion is not requested by the data owner and provided there is no legal obligation to retain it.

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