

PERSONAL DATA PROCESSING POLICY



HOTELES
BOGOTÁ PLAZA

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1. LEGAL BASIS AND SCOPE OF APPLICATION

The current data processing policy is grounded in Articles 15 and 20 of the Political Constitution, as well as in Articles 17, section k), and 18, section f), of Statutory Law 1581 of 2012, and Article 13 of Decree 1377 of 2013, which partially regulates the aforementioned law.

This policy shall be applicable to all personal data registered in databases subject to processing by the data processing controller, with the aim of ensuring compliance with the current regulations on the protection of personal data in Colombia.

2. DEFINITIONS

As established in Article 3 of Law 1581 of 2012 and Article 3 of Decree 1377 of 2013.

- Authorization: Prior, express, and informed consent of the Data Subject to carry out the processing of personal data.
- Privacy Notice: Verbal or written communication generated by the Data Controller, directed to the Data Subject for the processing of their personal data, through which they are informed of the existence of information processing policies that will be applicable to them, the means to access them, and the purposes of the processing intended for the personal data.
- Database: An organized set of personal data that is subject to processing.
- Personal Data: Any information linked to or that can be associated with one or more specific or identifiable natural persons.
- Public Data: Data that is not semi-private, private, or sensitive. Public data includes, among others, information related to a person's marital status, profession or occupation, and their status as a merchant or public servant. By its nature, public data may be found in, among other sources, public records, official documents, bulletins, and duly executed court resolutions that are not subject to confidentiality.
- Sensitive Data: Sensitive data refers to information that affects the privacy of the Data Subject or whose improper use could lead to their discrimination. This includes data that reveals racial or ethnic origin, political orientation, religious or philosophical beliefs, affiliation with trade unions, social or human rights organizations, or the promotion of the interests of any political party, as well as data related to health, sexual life, and biometric data.
- Data Processing Controller: A natural or legal person, whether public or private, who, either on their own or in association with others, processes personal data on behalf of the Data Controller.
- Data Controller: A natural or legal person, whether public or private, who, either on their own or in association with others, decides on the database and/or the processing of data.

- Data Subject: A natural person whose personal data is subject to processing.
- Transfer: Data transfer occurs when the Data Controller and/or data processing agent, located in Colombia, sends information or personal data to a recipient, who is also responsible for processing and is located inside or outside the country.
- Transmission: The processing of personal data that involves the communication of such data within or outside the territory of the Republic of Colombia, with the intention of processing by the agent on behalf of the controller.
- Processing: Any operation or set of operations on personal data, such as collection, storage, use, circulation, or deletion.

3. AUTHORIZATION FOR DATA PROCESSING POLICY

In accordance with Article 9 of the Personal Data Protection Law (PDPL), the processing of personal data requires the prior and informed consent of the data subject. By accepting this policy, any data subject providing information related to their personal data is expressly consenting to the processing of such information by HOTELES BOGOTÁ PLAZA S.A, under the terms and conditions set forth in it.

It's important to note that the data subject's authorization will not be necessary in cases where it concerns data required by a public or administrative entity in the exercise of their legal functions or by a judicial order.

- Public data.
- Cases of medical or sanitary emergencies.
- Information processing authorized by law for historical, statistical, or scientific purposes.
- Data related to the Civil Registry of individuals.

4. DATA CONTROLLER

The data controller for the databases subject to this policy is HOTELES BOGOTÁ PLAZA S.A, with the following contact information:

- **Address:** CALLE 100 # 18A - 30 Bogotá D.C., Colombia.
- **Email:** mercadeo@bogotaplazahotel.com
- **Phone:** (601) 632 2200



5. DATA PROCESSING AND DATABASE PURPOSES

HOTELES BOGOTÁ PLAZA S.A., in the course of its business activities, processes personal data related to natural persons that are contained in and processed within databases intended for legitimate purposes, in compliance with the Constitution and the Law.

Each of the databases, along with their information and characteristics, has been identified and recorded with the Superintendence of Industry and Commerce.

6. NAVIGATION DATA

The necessary technological tools for the proper functioning of our websites collect certain personal data that is implicitly transmitted through Internet communication protocols.

It is important to note that, due to the nature of the collected information, some of these data may allow the identification of users when associated with third-party information, even though such identification is not the primary purpose of their collection. Among these data are the IP address or the domain name of the computer used to access our websites, the URL, the date and time of access, and other parameters related to the user's operating system.

The sole purpose of collecting this data is to obtain anonymous statistical information about the use of the pages or to monitor their proper technical functioning. This data is immediately deleted once it has been verified.

7. COOKIES OR WEB BUGS

The website does not collect user's personal data through the use of cookies or web bugs; their usage is limited to facilitating user access to the website.

In the case of session cookies, they are not permanently stored on the user's computer and disappear once the browser is closed. The purpose of these cookies is to gather technical information to identify the session and enable secure and efficient access to the website.

If the user does not wish to allow the use of cookies, they have the option to reject or delete existing ones through the browser settings and by deactivating JavaScript code in the security configuration.



8. DATA SUBJECTS' RIGHTS

In accordance with Article 8 of the PDPA and Articles 21 and 22 of Decree 1377 of 2013, individuals, referred to as data subjects, may exercise various rights concerning the processing of their personal data. These rights can be exercised by the following parties:

- The data subject, who must sufficiently prove their identity through the means provided by the data controller.
- Their successors in interest, who must demonstrate such status.
- The representative and/or attorney-in-fact of the data subject, subject to proof of representation or power of attorney.
- By stipulation for the benefit of another and on behalf of another.
- The rights of children or adolescents will be exercised by those authorized to represent them

The rights of the Data Subject are as follows:

- Right of access or consultation: The Data Subject has the right to be informed by the data controller, upon request, regarding the origin, use, and purpose given to their personal data.
- Right to complaints and claims. **The law distinguishes four types of claims:**
 1. Rectification claim: The Data Subject's right to update, rectify, or modify partial, inaccurate, incomplete, fragmented data that may lead to error, or data whose processing is expressly prohibited or not authorized.
 2. Deletion claim: The Data Subject's right to have data that is inadequate, excessive, or that does not respect constitutional and legal principles, rights, and guarantees deleted.
 3. Revocation claim: The Data Subject's right to revoke the previously granted authorization for the processing of their personal data.
 4. Infringement claim: The Data Subject's right to request the correction of non-compliance with data protection regulations.
- Right to request proof of the authorization granted to the data controller: Except when expressly exempted as a requirement for processing in accordance with Article 10 of the Personal Data Protection Law.
- Right to file complaints for violations with the Superintendence of Industry and Commerce: The Data Subject or successor can only file this complaint after exhausting the consultation or claim process with the data controller or data processor.

9. CUSTOMER SERVICE FOR DATA SUBJECTS

HOTELES BOGOTÁ PLAZA S.A. will be responsible for addressing requests, inquiries, and claims presented by data subjects wishing to exercise their rights. To do so, we will internally manage the request with the responsible party for the corresponding database in order to provide a suitable response.

It is important to highlight that the company commits to responding in a timely and efficient manner to all received requests and to ensure the effective exercise of the rights of data subjects.

- **Phone:** (601) 632 2200
- **Email:** mercadeo@bogotaplazahotel.com

10. PROCEDURES FOR EXERCISING DATA SUBJECT RIGHTS

10.1. RIGHT TO ACCESS OR INQUIRE

In accordance with Article 21 of Decree 1377 of 2013, the Data Subject may freely inquire about their personal data in two cases:

- At least once every calendar month.
- Whenever substantial modifications to the information processing policies occur, triggering new inquiries.
- For inquiries with a frequency exceeding once per calendar month, HOTELES BOGOTÁ PLAZA S.A. may only charge the Data Subject for shipping, reproduction, and, if applicable, documentary certification costs. Reproduction costs should not exceed the costs of recovering the corresponding material. For this purpose, the data controller must substantiate these expenses to the Superintendence of Industry and Commerce, as required.
- The Data Subject may exercise the right of access or inquiry regarding their data by sending a written request to HOTELES BOGOTÁ PLAZA S.A. via email to: mercadeo@hotelesBogotáplaza.com, with the subject line "Exercise of the Right of Access or Inquiry," or by postal mail to CALLE 100 #18A - 30 BOGOTÁ DC, BOGOTÁ. The request must include the following information:
 1. Name and surname of the principal.
 2. Photocopy of the ID card of the Data Subject and, if applicable, the person representing them, along with the document accrediting such representation.
 3. Explicit petition for access or inquiry. Address for notifications, date, and signature of the requester.
 4. Documents supporting the request, if any.



- The Data Subject can choose one of the following methods for querying the database to receive the requested information:
 1. On-screen.
 2. In writing, with a copy or photocopy sent by certified mail, regular mail, or other electronic means.
 3. Any other system suitable for the database configuration or the nature of the processing, offered by HOTELES BOGOTÁ PLAZA S.A.
- Upon receiving the request, HOTELES BOGOTÁ PLAZA S.A. will respond to the inquiry within a maximum period of ten (10) business days from the date of receipt. If it is not possible to address the inquiry within this timeframe, the interested party will be informed, stating the reasons for the delay and specifying the date on which the inquiry will be addressed, which shall not exceed five (5) business days after the expiration of the initial period. These deadlines are established in Article 14 of the LEPD.
- After completing the inquiry process, the Data Subject or heir may file a complaint with the Superintendence of Industry and Commerce.

10.2. COMPLAINTS AND CLAIMS RIGHTS

The Data Subject may exercise the rights to file complaints about their data by submitting a written request to HOTELES BOGOTÁ PLAZA S.A. via email to mercadeo@hotelesbogotaplaza.com, with the subject line "Exercise of the Right of Access or Inquiry," or by postal mail to CALLE 100 # 18A - 30 BOGOTÁ D.C. The request must include the following information:

1. Name and surname of the principal.
2. Photocopy of the ID card of the Data Subject and, if applicable, the person representing them, along with the document accrediting such representation.
3. Description of the facts and petition specifying the request for rectification, cancellation, revocation, or infringement.
4. Address for notifications, date, and signature of the requester.
5. Documents accrediting the filed request that the requester intends to enforce, if any.

If the complaint is incomplete, the interested party will be requested to remedy the deficiencies within five (5) days from the receipt of the complaint. After two (2) months from the date of the request, if the requester has not provided the required information, it will be considered that they have withdrawn the complaint.

Upon receiving the complete complaint, a note stating "complaint in process" and its reason will be included in the database within a maximum term of two (2) business days. This note must be maintained until the complaint is resolved.

HOTELES BOGOTÁ PLAZA S.A. will address the request within a maximum period of fifteen (15) business days counted from the date of receipt. If it is not possible to address the complaint within this timeframe, the interested party will be informed of the reasons for the delay and the date on which their complaint will be addressed, which shall not exceed eight (8) business days after the expiration of the initial period.

After completing the claims process, the Data Subject or heir may file a complaint with the Superintendence of Industry and Commerce.

11. SECURITY MEASURES

HOTELES BOGOTÁ PLAZA SA, in order to comply with the security principle established in article 4, section g) of the LEPD, has implemented the necessary technical, human, and administrative measures to ensure the security and confidentiality of records, preventing their alteration, loss, consultation, unauthorized or fraudulent use, or access.

Furthermore, HOTELES BOGOTÁ PLAZA SA, through the signing of the respective transmission contracts, has required data processors with whom it collaborates to implement the necessary security measures to ensure the security and confidentiality of the information during the processing of personal data.

From the induction process for new personnel entering our organization, this Policy and its legal implications are made known. Access to information systems and other computer tools is controlled through the unique identification of users, along with their respective passwords and expiration dates.

In the event of an incident, the Technology department provides a response, ensuring the application of internal policies for information security and preserving the information in the databases on our servers.

Partial or total information extracted from automated databases is used exclusively within the premises. Guidelines are in place for the proper preservation, location, and retrieval of physical documents.

If there is a need to take any equipment with access to this information outside the premises, the exit and entry are controlled through supervision by the Security department.

All personnel, guided by top management and under the leadership of each department head, ensure the proper use of personal data through random checks in each of their processes and reporting any issues as they arise.



12. TRANSFER OF DATA TO THIRD COUNTRIES

In accordance with Title VIII of the LEPD, the transfer of personal data to countries that do not offer adequate levels of data protection is prohibited. A country is deemed to offer an adequate level of data protection when it complies with the standards set by the Superintendency of Industry and Commerce on the matter, which shall in no case be lower than what this law demands from its recipients. This prohibition shall not apply when it comes to:

- Data for which the Owner has granted their express and unequivocal authorization.
- Exchange of medical data when required for the Owner's treatment for health or public hygiene reasons.
- Banking or stock transfers in accordance with applicable legislation.
- Transfers agreed upon within the framework of international treaties to which the Republic of Colombia is a party, based on the principle of reciprocity.
- Transfers necessary for the execution of a contract between the Owner and the data controller or for pre-contractual measures, provided that the Owner's authorization is obtained.
- Legally required transfers for the protection of the public interest or for the recognition, exercise, or defense of a right in a judicial proceeding.

In cases not considered as exceptions, it will be the responsibility of the Superintendence of Industry and Commerce to issue the conformity declaration regarding the international transfer of personal data. The Superintendence is empowered to request information and carry out procedures aimed at establishing compliance with the prerequisites required for the feasibility of the operation.

International transmissions of personal data carried out between a data controller and a data processor, where the data processor processes the data on behalf of the data controller, will not require the data subject to be informed or to provide consent, as long as there is a contract for the transmission of personal information.

13. DURATION

The databases under the responsibility of HOTELES BOGOTÁ PLAZA S.A. will be subject to processing for as long as is reasonable and necessary for the purpose for which the data is collected. Once the purpose or purposes of the processing have been fulfilled, and without prejudice to legal norms indicating otherwise, HOTELES BOGOTÁ PLAZA S.A. will proceed to delete the personal data in its possession unless there is a legal or contractual obligation that requires its retention. Therefore, this database has been created without a defined period of validity.

