



PRESIDENTIAL DECISION

No. 001



Grupo Energía Bogotá



January 17, 2023

SCOPE OF THE DECISION

Adopting the Personal Data Processing Policy.

BACKGROUND

According to minutes No. 61 of the Strategic President's Committee of Processes and Learning of December 12, 2022, approving the Personal Data Processing Policy was recommended because it was considered appropriate for the organization, highlighting that:

- In line with the corporate value of Integrity, Grupo Energía Bogotá S.A. ESP. (hereinafter GEB) commits to appropriately process the personal data of its data subjects. For this reason, it recognizes the issuance of Law 1581 of 2012 and the importance of having a Personal Data Processing Policy.
- Since the GEB Personal Data Protection Program is a part of the integrated management system, it is developed with a continuous improvement approach, thereby allowing its strengthening and consolidation. General corporate guidelines are adopted through it to comply with the Colombian Personal Data Protection Regime, in accordance with the applicable regulations and the Principle of Proven Responsibility in terms of Personal Data Protection.
- Due to the evolution of GEB's Personal Data Protection Program, it is vitally important for the Organization to monitor and regularly update the corporate guidelines. That is the reason this decision has been issued.

PURPOSE

To establish the framework of action for properly processing the personal data of GEB's data subjects, ensuring the constitutional right of all people to know, update and correct the information collected on them and, therefore, appropriate personal information processing.

SCOPE

This policy must be applied by Grupo Energía Bogotá S.A. E.S.P.

STATEMENT OF COMMITMENTS

DATA PROTECTION AND PRIVACY

1. Recognizing the importance of the **security, privacy and confidentiality** of the Personal Data of its employees, customers, suppliers, contractors and, in general, all its stakeholders or data subjects with respect to which it processes personal information.
2. Processing personal data according to the principles and duties established in **Law 1581 of 2012 - Personal Data Protection Law ("LPDP", for the Spanish original)**, Decree 1074 of 2015, and other provisions that amend, modify, regulate, expand, complement or eliminate them.
3. Applying the guidelines established in this policy to **processing any Personal Data Database or files with personal information** created, managed and/or guarded by the organization, either as the data controller or processor.

4. Identifying the organization's **data subjects** with respect to which Personal Data Processing is carried out in developing the corporate purpose and different support activities for its completion, such as: customers, aspiring employees, employees, relatives of employees, former employees, pensioners, SENA interns, proponents, suppliers, contractors, event attendees, office visitors, petitioners, community members, those involved in rights of way processes, shareholders, Board members, among others.
5. Reporting the video surveillance areas in its facilities **using signs or distinguishing notices**, in compliance with the provisions of the Personal Data Protection on Video Surveillance Systems Guide of the Superintendence of Industry and Commerce. The collected images and sounds must be processed to provide security to our installations and monitor our staff. Personal information must be destroyed when no longer necessary or when the term established by current regulations ends.
6. Performing occasional or regular **supervision** regarding compliance with legal and contractual requirements associated with Personal Data Protection by suppliers, contractors or partnered third parties, for which **supporting documentation or evidence** of compliance may be requested and the measures deemed necessary for its verification may be applied.
7. Strictly using the collected information to perform and develop the activities derived from **GEB's corporate purpose**. Employees' access to information is restricted and only limited to those with authorization and training to properly manage personal information.
8. Adopting and applying physical, electronic and procedural safekeeping and security practices to make sure the personal information is kept **confidential and safe**, as required by the law and internal procedures.
9. Preserving the **Databases** during the **period of validity** that corresponds to the purpose for which their Processing was authorized and the special rules that regulate the matter. In addition, **Personal Data** will remain in the Databases for the **term required by law** for keeping documents and information, for the time necessary to perform the mentioned activities and while the Data Subject does not revoke the authorization, when said revocation applies.
10. This policy governs as of the date of its issuance.

PRINCIPLES THAT ENSURE PROPER PERSONAL DATA PROCESSING

11. Consistently and comprehensively applying the following principles, observing the general and special regulations on the matter:
 - a. **Principle of legality:** The provisions of Law 1581 of 2012, Decree 1074 of 2015 and the other provisions that amend, modify, regulate, expand, complement or eliminate them shall apply to the processing of information in the Databases held by GEB.

- b. Principle of purpose limitation:** Processing the information in the Databases held by GEB must follow a legitimate purpose according to the Constitution, Law and purposes previously informed to the data subject.
- c. Principle of freedom:** The information in the Databases held by GEB may only be processed when there is free, previous, express and informed consent from the data subject. Personal data may not be obtained or disseminated without prior authorization, or in the absence of a legal or judicial mandate that discloses the consent.
- d. Principle of veracity or quality:** The information subject to processing by GEB must be true, complete, exact, updated, verifiable and understandable. Partial, incomplete or fragmented data or data that can lead to errors will not be processed.
- e. Principle of transparency:** GEB guarantees your right to obtain information about the existence of data relating to you at any moment and without restrictions.
- f. Principle of restricted access and circulation:** Processing is subject to the limits derived from the nature of the personal data, provisions of the current law and Constitution. In this regard, Processing may only be carried out by people authorized by the Data Subject and/or the people stipulated in current law.
- g. Principle of security:** Information subject to Processing by GEB, as established in Law 1581 of 2012, shall be handled with the technical, human and administrative measures necessary to provide security to the records, avoiding adulteration, loss, or unauthorized or fraudulent consultation, use or access.
- h. Principle of confidentiality:** Every person involved in Personal Data Processing that is not a public servant is required to guarantee the confidentiality of the information, even after their relationship with some of the tasks included in the Processing has ended. They will only be able to provide or communicate personal data when appropriate to the development of activities authorized by regulations that pertain to the right to habeas data.
- i. Principle of storage limitation:** The storage period of Personal Data shall be the term required to achieve the purpose for which it was collected and/or while the data subject has pending obligations, or for the additional time required by special or general regulations.
- j. Principle of proven responsibility (*accountability*):** Data Controllers must be capable of demonstrating they have implemented appropriate and effective measures to comply with the obligations established in Law 1581 of 2012 and Decree 1377 of 2013 upon request by the Superintendence of Industry and Commerce (“SIC”, for the Spanish original).

INFORMATION PROVIDED BY DATA SUBJECTS

- 12.** Collecting personal information in order to verify the identity, level of education, financial and social condition, and reputation, among others, of data subjects (as it may apply) by **collecting pertinent, adequate, necessary and useful Personal Data** for the purpose it is required, in accordance with the current applicable regulations, among which are:
 - a.** Personally identifiable information.

- b. Financial and educational information.
- c. Information required to comply with ML/TF regulations.
- d. Information from intermediaries and other third parties, in which collecting said information is authorized by law.
- e. Information from legal institutions, such as enterprises, companies, corporations, associations, trusts, estates, consortia, temporary joint ventures, collaborative associations or investment clubs, as well as every authorized person, including but not limited to legal representatives, partners, associates, members, managers and implementers, as appropriate.
- f. Information provided by third parties, including related entities, commercial partners and other independent sources, as permitted by the Law.
- g. Information related to their digital identity and reputation available in the digital environment, including instant messaging services in any digital format, social networks, mobile devices and, in general, information related to their interactions on websites, applications, content and other third party products and services.
- h. Information collected through video surveillance systems or security cameras in places belonging to the physical plants.
- i. Biometric information for identity verification or when required by law.
- j. Other personal information.

PURPOSES OF PERSONAL DATA PROCESSING

- 13. Collecting the Personal Data of **Data Subjects** to be processed for the following general purposes:**
- a. Send correspondence and notifications.
 - b. Contact the Personal Data Subject by any means, especially, but not limited to, e-mail and/or cell phone.
 - c. Send information about activities, events, products and/or services of the Organization through the channels or media established for such purpose.
 - d. Maintain a shareholder registry, control of shares and payment of profits.
 - e. Have meetings of the board of directors, pay the board members' fees and send communications of interest to board members.
 - f. Carry out actions aimed at the community in general, where information is provided and activities are carried out related to the Organization's purpose.
 - g. Conduct market research, statistics and surveys within the framework of GEB's bylaws and policies.
 - h. Allow access to GEB facilities.
 - i. Capture images through video surveillance systems to ensure the safety of people and property on GEB facilities.
 - j. Use the data subject's image to generate notes or videos and publish them in different media highlighting GEB's activities and services.
 - k. Consult the information of the data subject registered in other Databases or files of any public or private, national or international entity.
 - l. Carry out procedures before authorities for which said information is pertinent.
 - m. Address requirements of public or private entities that, in compliance with legal or contractual mandates, are authorized to request and access Personal Data.
 - n. Provide information to auditors who are verifying the adequate administration of GEB.

- i. Create a record of suppliers in the SAP system that contains tax indicators for the purpose of paying invoices.
 - j. For evidentiary, legal, judicial and/or administrative purposes in potential internal or legal processes.
 - k. Develop the purpose of the contract.
 - l. Assess the performance and qualities of the contractor and/or supplier's team appointed to execute the contract.
 - m. Send advertising and publications related to the activities carried out by the Organization.
 - n. Carry out market studies, statistics and surveys, framed within the Organization's corporate purpose.
 - o. Transfer the Personal Data of suppliers within the framework of defining, structuring and executing strategic transactions, such as selling assets, in the event the Organization or parts of its business are sold, merged or acquired by third parties.
 - p. Negotiate and manage the rights of way required for GEB's infrastructure and operation.
 - q. Report, under the terms of Law 1266 of 2008, before any information operator or legally authorized risk center, on timely compliance or non-compliance with monetary obligations or duties of patrimonial content, presenting truthful, pertinent, exact, complete and updated information.
- 15. Collect the Personal Data of GEB **proponents** to be processed for the following **specific purposes**:**
- a. Assess the enabling request to present offers.
 - b. Verify the Data of the representatives who will participate in the contractual selection processes.
 - c. Perform market studies and statistics and store contractor information and organization surveys.
 - d. All others related to implementing the contractual selection process, particularly the one in which the proponent is presented.
 - e. Assess the performance and qualities of the team proposed by the Proponent to execute the contract.
- 16. Collect the Personal Data of GEB **employees and aspiring employees** to be processed for the following **specific purposes**:**
- a. Select staff, study resumes, verify data provided by the candidate, verify personal, family and/or commercial reference contacts and location data.
 - b. Carry out and verify onboarding, regular or separation health exams by the Organization.
 - c. Conduct written and oral selection tests, psychotechnical tests and/or interviews.
 - d. Accepting internal procedures for selection, admission, occupational health and recruitment.
 - e. Allow access to the Organization's facilities.
 - f. Carry out access control and guarantee the security of people and goods.
 - g. Have a record of the activities carried out by the Organization.
 - h. Process affiliations to the Health Promotion Entities (EPS, for the Spanish original), Pension and Severance Fund Managers (AFP, for the Spanish

- original), Family Compensation Funds (CCF, for the Spanish original), insurance policies or an additional health plan when applicable.
- i.** Carry out security studies for onboarding and monitoring during the duration of the employment relationship.
 - j.** Verify the information related to the System for Prevention of Money Laundering and Terrorist Financing, conflicts of interest, disqualifications and incompatibilities.
 - k.** Guarantee compliance with trade union rights in articles 38, 39 and 55 of the Political Constitution of Colombia, as well as comply with the current collective labor agreement, when applicable.
 - l.** Maintain a record of employees and pensioners.
 - m.** Collect and custody resumes.
 - n.** Review the criminal, contractual, disciplinary and tax records of the Data Subjects before the relevant authorities.
 - o.** Fully identify the Data Subjects by filing and handling their contact details, professional and academic information, among others.
 - p.** Enter into employment, apprenticeship, services or any contracts that apply.
 - q.** Comply with any other benefit derived from the contractual relationship between the Data Subjects and the Organization.
 - r.** Inform instructions when hiring Data Subjects, if applicable.
 - s.** Assess the performance of the Data Subjects.
 - t.** Manage payroll, payment of financial support, among others, by the Organization or a third party; manage and make the necessary payments to the bank account indicated by the Data Subjects or entities expressly indicated by the Data Subjects.
 - u.** Contract life insurance and medical expenses with the Organization or a third party.
 - v.** Notify relatives of the Data Subjects in cases of emergency during working hours or in connection with contract performance.
 - w.** Communicate, reproduce and publish photographs and/or videos of the Data Subjects by the Organization for marketing and advertising purposes, in the Organization's internal or external media.
 - x.** Maintain the health and safety of the Data Subjects in the workplace directly by the Organization or by a third party, in accordance with the regulations applicable to the Occupational Safety and Health Management System (hereinafter "OSHMS").
 - y.** Collect information and evidence in order to carry out disciplinary processes, if applicable.
 - z.** Use the information for procedures and documents related to the contractual relationship of the Data Subjects with the Organization.
 - aa.** Send information about the Organization to the Data Subjects.
 - bb.** Communicate and carry out well-being activities for the Data Subjects and their families within the Organization.
 - cc.** Take photographs of the Data Subjects and their families in the framework of well-being activities or other activities.
 - dd.** Decision-making in labor and/or contractual matters regarding the performance and termination of the contract with the Data Subjects, either by the legal area of the Organization or its external advisor.
 - ee.** Transfer the Personal Data of the Data Subjects to GEB companies located inside or outside of Colombia for the aforementioned purposes.
 - ff.** Nationally or internationally transfer and/or transmit the Personal Data of the Data Subjects to third parties or business partners for the purpose of business prospecting or marketing.

- b. Informing the Data Subject that, since it is sensitive data, they are not obliged to authorize its Processing.
 - c. Inform the Data Subject, explicitly and in advance, that Data subject to Processing are sensitive, and the purpose of such Processing.
19. Strictly complying with the limitations and obligations established by Law 1581 of 2012, its regulatory decrees and other similar regulations, in the event GEB Processes the **Sensitive Data of children and/or adolescents**. In such event, it shall make sure that:
- a. The processing responds to and respects the best interests of the children and adolescents.
 - b. The processing ensures respect for the fundamental rights of the children and adolescents.
 - c. The processing of minors' personal data will be preceded by the express authorization of their legal representative.
 - d. The legal representative of the minor is informed that, since it is the Data of minors, they are not obliged to authorize its Processing.
 - e. The legal representative of the minor is informed of the purpose of the Data Processing.

PERSONAL DATA PROCESSING

20. **GEB and/or the third parties it hires** carry out the following operations and/or activities to develop the internal processes required in its operations:
- a. Know, store and process all the information you provided in one or various Databases, in the format deemed most convenient.
 - b. Know, store on physical or electronic media, record, process and monitor all the information you provided verbally or in writing through any channel established by GEB, which may even be used as evidence in any complaint, claim, settlement or lawsuit.
 - c. Order, catalogue, classify, divide or separate the information you provided.
 - d. Verify, corroborate, confirm, validate, monitor, research or compare the information you provided with any information GEB legitimately has, including information of our affiliates or subsidiaries.
 - e. Nationally or internationally transfer and/or transmit your personal information to the third parties the Organization stipulates, which may be able to act as Data Managers or Controllers.
 - f. Analyze, process, assess, treat or compare the information you provided or GEB collected through interactions you made on digital platforms related to it. The same authorizations you provided will apply to the Data resulting from analyses, procedures, assessments, processing and comparisons.
 - g. Collect, use, disclose, store, transfer and transmit the personal data to jurisdictions outside of the national territory. Furthermore, the competent authorities may access personal information, in accordance with the law and local regulations.

TRANSMISSION AND TRANSFER OF PERSONAL DATA

- 21. Transmit** the Personal Data of Data Subjects to **third parties located in Colombia or abroad** as Data Processors, to Process Personal Data in order to develop the purposes indicated previously in this policy.
- 22. Transfer** the **Personal Data** of Data Subjects to its **affiliates and subsidiaries** in **Colombia or abroad**.
- 23. Transfer** the Personal Data of Data Subjects to Data Controllers in Colombia or abroad for the purposes indicated above.
- 24. Implement** the **authorizations** and/or **Data Transfer** and/or **Transmission contracts** necessary to comply with the obligations provided in the Colombian Personal Data Protection regime.

GEB'S OBLIGATIONS AS DATA CONTROLLER

- 25.** Ensuring compliance with the following duties, notwithstanding the provisions of the applicable regulations and others than govern our activity:
 - a.** Guaranteeing the full and effective exercise of the right of habeas data at all times.
 - b.** Requesting and keeping a copy of the respective authorization you granted.
 - c.** Duly notifying the purpose of data collection and the rights data subjects are entitled to in light of the granted authorization.
 - d.** Keeping the information under the safety conditions necessary to prevent unauthorized or fraudulent adulteration, loss, consultation, use or access.
 - e.** Making sure the information provided to the Data Processor is true, complete, exact, up to date, verifiable and understandable.
 - f.** Updating the information, notifying the Data Processor in a timely manner of any developments regarding the Data that has already been provided and adopting other measures necessary to keep the information up to date.
 - g.** Correcting the information when it is incorrect and notifying the Data Controller as needed.
 - h.** Only providing the Data Processor data that has already been authorized for processing, as the case may be.
 - i.** Requiring the Data Processor to abide by the security and privacy conditions of the data subject's information at all times.
 - j.** Processing consultations and formulated claims.
 - k.** Notifying the Data Processor when certain information is under discussion once the claim has been filed and the respective proceeding has not been finalized.
 - l.** Informing how your Data has been used, when you request it.
 - m.** Notifying the Data protection authority in the event of violations of the security codes or when there are risks in managing your data.
 - n.** Complying with any instructions and requirements made by the Superintendence of Industry and Commerce.

AUTHORIZATION OR CONSENT TO PROCESS PERSONAL DATA

26. **Previously, expressly and informedly** requesting authorization for Personal Data Processing, except in the cases defined in article 10 of Law 1581 of 2012. This authorization may be granted **in writing, orally** or through **unequivocal conducts** that allow reasonably concluding that the authorization was granted.
27. Guaranteeing the right of Personal Data Subjects to revoke the authorization when the constitutional and legal principles, rights and guarantees are not respected in the Processing. This will prevail in cases in which, once the request is made, the Organization determines it, or when the Personal Data protection authority orders it. However, if GEB considers that the revocation is not admissible, it will notify it by means of a communication with supporting arguments. Once the authorization has been revoked, in the applicable cases, GEB will proceed to delete the information in the respective databases.
28. Guaranteeing the right of Personal Data Subjects to delete the data when the Processing fails to respect constitutional and legal principles, rights and guarantees.
29. Information will be kept, even after requests to revoke the authorization or delete the information have been presented, when the data subject has a legal or contractual duty to remain in the database.

RIGHTS OF DATA SUBJECTS

30. Guaranteeing the following rights, in compliance with the constitutional and legal provisions as the Data Controller of personal data:
 - a. Knowing, updating and correcting their personal data. This right may be exercised on partial, inaccurate, incomplete or fragmented data or data that leads to error, among others, or data expressly forbidden or not authorized to be processed.
 - b. Requesting proof of authorization granted to GEB, except when expressly exempted as a requirement for Processing, in accordance with provisions of Article 10 in Law 1581 of 2012.
 - c. Being informed by GEB, upon request, as to how they Process their Personal Data.
 - d. Submitting claims to the Superintendence of Industry and Commerce for violations of the provisions of Law 1581 of 2012 and other regulations that modify, add to or complement it, complying with the requirement of procedure to that end, consisting of having exhausted the process of consultation or claim with the Company.
 - e. Revoking the authorization and/or requesting deletion of the data when the process fails to respect constitutional and legal principles, rights and guarantees. Revoking and/or deleting data will apply when the Superintendence of Industry and Commerce has determined we have incurred in conducts that violate the law and Constitution during Processing. Notwithstanding the foregoing, the requests to delete the information and

revoke the authorization shall not apply when the data subject has a legal or contractual duty to remain in the database.

- f. Accessing the personal data that was subject to processing, free of charge.
- g. Refraining from answering questions or providing information related to your Sensitive Data, without this conditioning any activity or service.

Only the following individuals may exercise these rights:

- a. The Data Subject, who must sufficiently prove their identity.
- b. Their successors, who must verify said capacity.
- c. The Data Subject's representative and/or attorney-in-fact, upon accreditation of the representation or power of attorney.
- d. By stipulation in favor of another or for another person.

SERVICE CHANNEL FOR EXERCISING RIGHTS

GEB has implemented the following channels to help Data Subjects exercise their rights:

- a. E-mail: datospersonales@geb.com.co
- b. To the address Carrera 9 No. 73 – 44 Floor 6

Personal Data Subjects or third parties authorized by law to act on their behalf may use these channels to exercise their rights.

PROCEDURES FOR EXERCISING THE RIGHTS OF DATA SUBJECTS

CONSULTATIONS

- 31. Guaranteeing the right of data subjects to submit consultations through the enabled channels. Through the consultation procedure, data subjects may:
 - a. Request access to personal information.
 - b. Request proof or evidence of the authorization granted to GEB to Process the personal information.
 - c. Consult how the personal information has been used.
- 32. Addressing consultations submitted through the authorized channels and following the procedure described below:
 - a. Data Subjects or their representatives may make inquiries regarding the Personal Data subject to Processing by GEB at any time and free of charge. In all cases, the identity and the power to make the consultation must be proven.
 - b. The consultation will be addressed within ten (10) business days as of the date the inquiry is received. When it is not possible to address the consultation in that time, the interested party will be notified, stating the reasons and indicating the date the consultation will be resolved. Under no circumstances may that period exceed five (5) business days after the expiration of the first term.

CLAIMS

- 33.** Guaranteeing the right of data subjects to submit claims through the enabled channels. Through the claims procedure, the data subject may request access to their personal data and the details of personal information processing, as well as to correct and update them if they are inaccurate, or request deletion when they consider it excessive or unnecessary for the purposes that justified the data being obtained, or if they oppose processing for specific purposes.
- 34.** Address claims submitted through the enabled channels and following the procedure described below:
- a.** You or your representative may make claims regarding the Personal Data subject to Processing by GEB at any time and free of charge. In all cases, the identity and the power to make the claim must be proven.
 - b.** If the claim is incomplete, you will be required to make the necessary corrections within five (5) days after its receipt. The claim will be considered relinquished if you have not presented the required information two (2) months after the date of requirement. If the person who received the claim is not competent to resolve it, it will be transferred to the corresponding person in no more than two (2) business days and the interested party will be notified of the situation.
 - c.** The claim will be addressed within a maximum term of fifteen (15) business days as of the day after the date of receipt. When it is not possible to address the claim in that time, the interested party will be informed of the reasons for the delay, indicating the date the claim will be addressed. Under no circumstances may this exceed eight (8) business days after the expiration of the first term.

REQUIREMENTS FOR ADDRESSING CONSULTATIONS AND CLAIMS

- 35.** Guaranteeing the right to submit consultations and claims in the framework of compliance with the requirements of Law 1581 of 2012, the regulation governing consultations and claims according to Law 1755 of 2015, the regulation governing the Right to Petition in Colombia. Requests intended for GEB must contain at least the following:
- a.** Identification of the Data Subject (name and I.D.).
 - b.** Description of the facts that caused the consultation or claim.
 - c.** The purpose of the request.
 - d.** Specifying the notification address of the Data Subject, either physical or electronic (e-mail).
 - e.** Attaching the documents, the petitioner wishes to use for support (especially for claims).
 - f.** If the claim consists of correcting Personal Data, in addition to the requirements stipulated above, it must contain the specification of the corrections to be made and supporting documentation for the request.
 - g.** If the claim consists of a request to delete Personal Data, it must identify the Data to be deleted, and proceed as deemed by the Company or in cases in which the Personal Data Protection Authority orders it.
 - h.** The request to delete the information and revoke the authorization will not apply when the data subject has a legal or contractual duty to remain in the database.

Requests through third parties, with the representative or attorney's accreditation, must include:

- a. Identification of the authorizing data subject.
- b. A copy of the citizen's I.D. or I.D. of the data subject.
- c. Name, identification data and copy of the I.D. or identification document of the authorized person.
- d. The time for which they can consult, update or correct the information (only once, for one year, for the duration of the legal relationship, or until further notice, etc.).
- e. The voluntary and discretionary nature of the authorization.
- f. In all cases, GEB may request additional documents that accredit the third party's representation or power of attorney.

Clarifying note: The terms for replies to consultations and claims will begin as of the moment GEB has effective knowledge of the request through the established channels. In the event the data subject wishes to file a complaint with the Superintendence of Industry and Commerce regarding Personal Data, the data subject must have previously exhausted the consultation or claim process with GEB, in accordance with the aforementioned indications. We declare our total willingness to address your concerns.

DATA CONTROLLER AND THE AREA RESPONSIBLE FOR ADDRESSING CONSULTATIONS AND CLAIMS FOR PERSONAL DATA PROTECTION

The Personal Data Controller is **Grupo Energía Bogotá S.A. E.S.P.**, identified with TIN: 899.999.082-3, domiciled in the city of Bogotá D.C. at this address: Carrera 9 No. 73 – 44 Piso 6, telephone number: 3268000, e-mail: datospersonales@geb.com.co.

The **Compliance Department** is in charge of leading management to implement, follow up on, monitor, control and continuously improve this policy. The scope of its management includes a periodic evaluation of this Policy to establish its relevance and functionality, making the necessary adjustments if required.

The **Personal Data Protection Officer** is responsible for addressing all the consultations and claims of Data Subjects for them to be able to exercise their rights related to Personal Data Protection to know, update, correct and suppress data and revoke authorization.

The **Sustainability and Communications Department** is responsible for communicating and disclosing this policy through the available media, so that it is known among all the organization's stakeholders.

This Policy is mandatory for representatives and managers, all dependent and independent employees, individuals and legal entities related through any of the contractual modalities established in the Contracting Manual, individuals and legal entities in the capacity of Data Processor before GEB and others provided in the regulations or any contractual provision.

DEFINITIONS

1. **Department:** Unit that integrates the administrative structure of the Organization. In that sense, when the Policy imposes an obligation on a department, or said department is contacted, the department's manager or whomever acts on its behalf shall be responsible for compliance.
2. **Authorization:** Express and informed prior consent by the data subject to Process the Personal Data.
3. **Database:** An organized set of Personal Data subject to Processing.
4. **Personal Data:** Any information related to or that can be associated with one or more specific or determinable individuals. Personal data can be classified as:
5. **Public Data:** Data that is not private or sensitive. The following, among others, are considered Public Data: name, I.D., marital status, gender, etc. Moreover, data that is free to access and consult in light of a decision by the data subject or a legal mandate are public data.
6. **Semi-private Data:** Semi-private data is that which has no intimate, classified or public nature, and whose knowledge or disclosure may interest not only its data subject but a certain sector or group of people or society in general, such as the financial or credit data of a commercial activity or service.
7. **Private Data:** Data that, due to its intimate or confidential nature, is only relevant to the data subject, such as salary information, contact information, academic information and others.
8. **Sensitive Data:** Data that affect the data subject's intimacy or whose inappropriate use may result in discrimination, such as data that reveal racial or ethnic origin, political orientation, religious or philosophical convictions, membership in labor unions or social or human rights organizations, or those that promote the interests of any political party, or guarantee the rights and assurances of oppositional political parties, as well as data pertaining to health, sexual life and biometric information, among others.
9. **Data Processor:** An individual or public or private legal entity responsible for processing the personal data on its own or in association with others.
10. **Regulation:** Refers to the Political Constitution of Colombia, laws, decrees, resolutions, ordinances, agreements, and opinions by the National Authority for Personal Data Protection and jurisprudence.
11. **Personal Data Protection Officer:** The person responsible for addressing petitions, inquiries and claims submitted by the data subject in exercising their right to review, update, correct and delete the data and revoke the authorization. The Personal Data Protection Officer will support and guide the implementation process of the principle of proven responsibility.
12. **Data Controller:** An individual or public or private legal entity that makes decisions on the Database and/or Data Processing by itself or in association with others.
13. **Data Subject:** An individual whose personal data is subject to Processing.
14. **Transfer:** A data transfer occurs when the personal data controller and/or processor sends the information or Personal Data to a recipient who is the Data Controller and is either inside or outside the country from which it was sent.
15. **Transmission:** Personal Data Processing that implies communication of such data in Colombia or abroad when the purpose is for the controller to do processing at the behest of the Data Processor.
16. **Processing:** Any operation or set of operations on personal data such as collection, storage, use, circulation or deletion.

DOCUMENTATION CONTROL

	Name	Position	Area
Prepared by:	Maria Claudia Alvarez	Personal Data Protection Official	Corporate Compliance Department
	Luz Elena Díaz	Corporate Compliance Director	Corporate Compliance Department
Reviewed by:	Néstor Fagua	Vice President of Legal and Compliance	Legal and Compliance Vice Presidency
Approved by:	Juan Ricardo Ortega	CEO	CEO's Office

VALIDITY

Prior Decision No.	Version date	Type of action	Reason for the update and description of the last version
1	07/23/2013	Creation	The Personal Data Processing Policy is created, in compliance with the constitutional and legal provisions that govern personal data protection. This policy was approved by EEB's President's Committee.
2	09/30/2014	Update	The Personal Data Processing Policy is updated, in compliance with the constitutional and legal provisions that govern personal data protection.
3	08/12/2016	Update	The Personal Data Processing Policy is updated, in compliance with the constitutional and legal provisions that govern personal data protection.
4	12/18/2017	Update	The Personal Data Processing Policy is updated, taking the change in GEB's corporate name into account.
5	17/01/2023	Update	The Personal Data Processing Policy is updated according to the principles and duties established in Law 1581 of 2012. This decision modifies all previous agreements, whether they are verbal or

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Personal Data Processing Policy

			written, with respect to collecting, using, storing, circulating, disclosing and deleting Personal Data, and it can be modified by GEB at any time, informing said modifications to the Data Subjects through the channels provided to that end, as provided by local regulations.
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