

PERSONAL DATA PROCESSING POLICY CLINIQ DERMOESTÉTICA Y LÁSER S.A.

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I. OBJECTIVE OF THE PROCESSING POLICY

CLINIQ DERMOESTETICA Y LASER S.A. (hereinafter "**CLINIQ**"), in order to strictly comply with current regulations on the protection of personal data, especially Law 1581 of 2012, Decree 1377 of 2013, and other provisions that modify, add, or complement them, and committed to the privacy of the personal information of its clients, shareholders, allies, suppliers, contractors, potential clients, candidates in the personnel selection process, users, employees, and the general public, adopts the following Personal Data Processing Policy (hereinafter the "Policy").

In this Policy, applicable to the personal data registered in its databases, **CLINIQ** details the general corporate guidelines on the proper treatment of the personal data of the owners, the rights of the owners, the department responsible for addressing inquiries and claims, and the procedures that must be followed to know, update, rectify, and delete

personal data.

In compliance with the constitutional right to Habeas Data established in Article 15 of the Political Constitution of Colombia, coordinated with Article 9 of Law 1581 of 2012 and Article 7 of Decree 1377 of 2013, **CLINIQ** only collects personal data when it has been previously, expressly, and informedly authorized by its owner, by any of the following forms: (i) in writing, (ii) orally, or (iii) through unequivocal conduct of the owner that allows concluding reasonably that they granted the authorization.

II. DEFINITIONS

For the purposes of this policy for the processing of personal data, the following terms are understood as:

- a) **Holder:** Natural person whose personal data is subject to processing. This concept includes, especially but not limited to, the following interest groups: clients, shareholders, allies, suppliers, contractors, potential clients, candidates in the personnel selection process, users, and employees.
- b) **Processing:** Any operation or set of operations on personal data, such as collection, storage, use, circulation, transfer, or deletion.
- c) **Authorization:** Prior, express, and informed consent of the Holder to carry out the Processing of personal data.
- d) **Privacy Notice:** Verbal or written communication generated by the Controller, addressed to the Holder for the Processing of their personal data, informing them about the existence of the information processing policies applicable to them, how to access them, and the purposes of the Processing intended for the personal data.
- e) **Sensitive Data:** Sensitive data is understood as those that affect the privacy of the Holder or whose misuse can lead to discrimination, such as those revealing racial or ethnic origin, political orientation, religious or philosophical beliefs, membership in unions, social organizations, human rights organizations, or promoting interests of any political party or guaranteeing the rights and guarantees of opposition political parties,

as well as data related to health, sexual life, and biometric data.

- f) **Personal Data:** Any information linked or that can be associated with one or more determined or determinable natural persons, including, especially, names, surnames, identification numbers, bank account numbers, email addresses, and socio-economic information.
- g) **Transfer:** The transfer of data occurs when the Controller, located in Colombia, sends information or personal data to a recipient.
- h) **Database:** Organized set of personal data subject to processing.

III. AUTHORIZATION FOR THE PROCESSING OF PERSONAL DATA

The personal data included in **CLINIQ**'s databases come from information collected as a result of its social, commercial, contractual, labor-related, or any other kind of links with its users, clients, allies, suppliers, contractors, employees, or the general public.

At the time of collecting personal data, **CLINIQ** will request authorization from the owners for the processing of the data, in a prior, express, and informative manner, informing them about: (i) the treatments that **CLINIQ** will carry out and the specific purposes of the processing; (ii) the freedom to answer questions addressed to minors or sensitive data; (iii) the rights that owners have against **CLINIQ** and other processors and controllers of the processing, and the means to exercise them; (iv) the identification of **CLINIQ** as the data processing controller; and (v) the location of this Policy.

The personal data collected by **CLINIQ** is stored through physical and digital means, either owned or contracted with specialized providers, seeking to safeguard the confidentiality and security of the personal information of the owners.

CLINIQ may obtain authorization from the Holders of personal data: (i) in writing; (ii) orally; or (iii) through unequivocal conduct of the Holder that reasonably allows concluding that they granted the authorization.

CLINIQ will retain proof of the authorization granted by the Holders of personal data for the processing of the same.

IV. PURPOSES OF PROCESSING

The personal data of the owners is collected and processed by CLINIQ in the development of its social purpose for the following purposes:

Purposes	<ul style="list-style-type: none"> a) Perform the relevant actions for the development of CLINIQ's social purpose. b) Perform the necessary actions for the development of contracts concluded with the owners of personal data, whether acting on their own behalf or on behalf of a legal entity. c) Manage, develop, and maintain commercial, labor, civil, or any other relationships that may exist between CLINIQ and its employees, clients, suppliers, shareholders, contractors, and/or third parties. d) Contact the owner of the data through different means to carry out the purpose of contractual relationships. e) For commercial purposes related to the products, benefits, and promotions of CLINIQ. This includes the collection of images, photographs, and videos that may be published and incorporated into advertising media or social networks for the purpose of promoting or advertising the service within the social purpose. f) Send commercial information, updates, and information about the business status. g) Conduct activities in the personnel selection process, including the data registered on the resume, with the possibility of verifying its content. h) Carry out tasks related to the generation of employee payrolls, payment of social benefits, contributions to the Social Security System, as well as billing, payments, collections, and debt recovery, including human resource management, administrative, and financial activities. i) Properly execute the commercial agreements concluded with third-
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	<p>party allies.</p> <p>j) Respond to requests from competent judicial or administrative authorities, ensuring, in any case, to disclose only relevant and necessary information to respond to the respective request.</p> <p>k) Manage requests, inquiries, and claims submitted by the owners of personal data regarding the treatment given to them by CLINIQ.</p>
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V. PROCESSING OF PERSONAL DATA

A. Temporal Limit of Personal Data Processing

CLINIQ will process personal data for a reasonable and necessary period, not less than the duration of **CLINIQ** or the contractual, legal, or commercial relationship with the owner of the personal data. Once the purpose or need for processing personal data ceases, they will be deleted from **CLINIQ**'s databases or archived under appropriate security measures, only to be disclosed when required by law.

B. Types of Personal Data Processed by CLINIQ

In pursuit of the described purposes, **CLINIQ** collects and processes personal identification data, contact information, location data, family data, date of birth, gender, image, photographs, employment data, academic data, purchase data, individualization data, among others. In the event that **CLINIQ** collects and processes personal data of children and adolescents, their best interest and fundamental rights will be respected. **CLINIQ** will request the respective authorization for the processing of personal data from the representative of the child, ensuring the right of the minor to be heard. In the processing of sensitive data, **CLINIQ** will strictly adhere to the principles established in Law 1581 of 2012 and the fundamental rights associated with this type of information. No activity of **CLINIQ** will be conditioned to the provision of sensitive data by the owner, unless required by current law.

C. CLINIQ Acting as Data Processor:

CLINIQ may, acting as a data processor, receive personal data from third parties with whom it has a contractual relationship. In these cases, **CLINIQ** will comply with the duties established in Article 18 of Law 1581 of 2012.

D. Transmission and Transfer of Personal Data to Third Parties

CLINIQ may transmit or transfer the collected personal data to third parties located in Colombia or abroad, including **CLINIQ**'s parent, subsidiary, and affiliate companies, for any of the aforementioned purposes. In any case, **CLINIQ** will adopt legal and technological measures to ensure the security and confidentiality of personal data and will require data processors to comply with the duties established in Article 18 of Law 1581 of 2012.

E. Processing of Sensitive Data:

CLINIQ will process sensitive data only when:

- i. The Holder has given explicit authorization for such Processing, except in cases where the granting of such authorization is not required by law.
- ii. The Processing is necessary to safeguard the vital interest of the Holder, and the Holder is physically or legally incapacitated. In these cases, legal representatives must grant their authorization.
- iii. The Processing is carried out in the course of legitimate activities with due guarantees by a foundation, NGO, association, or any other non-profit organization, whose purpose is political, philosophical, religious, or union-related, provided that they refer exclusively to their members or individuals who maintain regular contact due to their purpose. In these cases, data cannot be provided to third parties without the authorization of the Holder.
- iv. The Processing relates to data that are necessary for the recognition, exercise, or defense of a right in a judicial process.
- v. The Processing has a historical, statistical, or scientific purpose. In this event, measures must be taken to de-identify the Holders.

F. Use of Cookies:

A cookie is a small data file placed on computers or other devices that allows a platform or website to recognize holders as users when they revisit the platform or website using the same computer or browser. Cookies are a very common technology to remember certain information about the user of a website. **CLINIQ** may use cookies to improve its platform or website and the browsing experience; and to tailor the advertising and content that the holder views.

VI. RIGHTS OF THE HOLDER OF PERSONAL DATA

In accordance with Article 8 of Law 1581 of 2012, the holder of personal data will have the following rights:

- i. Access, free of charge, to their personal data that are subject to processing.
- ii. Request proof of the authorization granted to **CLINIQ**, except when expressly exempted as a requirement for processing, in accordance with the provisions of Article 10 of Law 1581 of 2012.
- iii. Know, upon request addressed to **CLINIQ** or the data processor, about the use that has been given to their personal data.
- iv. Update and rectify their personal data against **CLINIQ** or data processors when the data is partial, inaccurate, incomplete, fragmented, or misleading.
- v. Revoke the authorization and/or request the deletion of personal data, provided there is no legal or contractual obligation preventing their elimination.
- vi. File complaints with the Superintendence of Industry and Commerce for violations of Law 1581 of 2012 and other regulations modifying, adding, or complementing it.
- vii. Refrain from answering questions about sensitive data or data of children and adolescents.

VII. PROCEDURES TO SUBMIT INQUIRIES AND COMPLAINTS AND THE AREA RESPONSIBLE FOR HANDLING THEM

A. Attention to Requests

CLINIQ will be responsible for addressing requests from the Holders or their successors when it is the data controller. Holders can request to know, update, rectify, or delete any of their data or revoke the authorization for the processing of their information by emailing servicioalcliente@cliniq.co.

B. Procedure to Consult Personal Information

Holders or their successors may inquire about the personal information held in CLINIQ's databases by submitting a query that will be addressed 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 period, the interested party will be informed, stating the reasons for the delay and indicating the date on which the inquiry will be addressed, which in no case may exceed five (5) business days following the expiration of the first term.

C. Procedure for Requests

Claims or requests from Holders or their successors will be processed according to the following rules:

- i. The claim will be made by a request addressed to CLINIQ with the identification of the Holder, a description of the facts giving rise to the claim, the address, and accompanying the documents to be asserted. If the claim is incomplete, the interested party will be required within five (5) days following the receipt of the claim to remedy the deficiencies. If, after two (2) months from the date of the requirement, the applicant has not provided the requested information, it will be understood that they have withdrawn the claim.
- ii. If the party receiving the claim is not competent to resolve it, they will transfer it to the appropriate party within a maximum period of two (2) business days and inform the interested party of the situation.
- iii. Once the complete claim is received, a legend stating "claim in process" and the reason for it will be included in the database within a maximum term of two (2) business days.

This legend must be maintained until the claim is decided.

- iv. The maximum term to address the claim will be fifteen (15) business days from the day following the date of its receipt. If it is not possible to address the claim within this term, the interested party will be informed of the reasons for the delay and the date on which their claim will be addressed, which in no case may exceed eight (8) business days following the expiration of the first term.

VIII. INFORMATION ABOUT THE DATA PROCESSING CONTROLLER

CLINIQ is identified by the following details:

Legal name	CLINIQ DERMOESTÉTICA Y LÁSER S.A.
NIT	900063460 – 1
Legal representative	JUAN FELIPE BUSTAMANTE BEDOYA
City	Medellín
Phone number	(604) 444 05 90
Address	Circular 71 #39 – 33
Email	servicioalcliente@cliniq.co

IX. PRIVACY NOTICE

In cases where it is not possible to make this personal data processing policy available to the Holder, they will be informed through a privacy notice about its existence and how to access it promptly.

X. VALIDITY OF THE POLICY

This Policy is effective from its publication, the date of which is indicated at the end of this

document. **CLINIQ** may modify this Policy at any time to adapt it to legislative or jurisprudential novelties, as well as to best practices that develop regarding the protection of personal data. In such cases, the holders will be promptly informed through the contact information authorized by them and through the website - www.cliniq.com.co, where the modified version of the Policy and the date of its entry into force will be made available to the holders.

Date: February 24th, 2023

CLINIQ DERMOESTÉTICA Y LÁSER S.A.