

## PRIVACY POLICY AND PERSONAL DATA TREATMENT OF EXPATGROUP.CO

EXPATGROUP.CO S.A.S, company identified with NIT. 901.242.858-9 (hereinafter, "**Expatgroup.co**"), is an entity that respects the personal data and information provided by workers, contractors, business partners, suppliers, distributors, shareholders, users and possible interested parties in Expatgroup.co services; For this reason, we issue this Privacy Policy and Personal Data Processing (hereinafter, the "**Policy**") where the purposes, scope, measures and procedures of databases are established, as well as the mechanisms with which the Holders of the information have to know, update, rectify or delete the data provided, or revoke the authorization that is granted with the acceptance of this Policy.

The use of the services offered by Expatgroup.co (hereinafter, the "**Services**"), the conclusion of employment contracts or the provision of services, and/or the express and unequivocal acceptance of this Policy, implies the acceptance of the Holders of the information regarding the Policy and their authorization for the uses and other treatments described below.

### CHAPTER I

#### DEFINITIONS, SCOPE, PRINCIPLES AND GENERALITIES OF THE POLICY

1. **Definitions.** For a better understanding and compliance with this Policy, the following definitions must be considered, which will have the meaning detailed below, even if used singularly or plurally throughout the Policy.

**"Privacy Notice":** verbal or written communication to inform the Holders of the information, the existence, and ways to access the information treatment policies and the purpose of its collection and use.

**"Authorization":** prior, express, and informed consent by the Holder to process the Personal Data.

**"Database":** organized set of Personal Data that are subject to Processing.

**"Cookies or Similar Technologies":** text file that is downloaded to the computer's hard drive or saved in the memory of the web browser when the Holders visit the Expatgroup.co website and/or any of its landing pages (hereinafter, the places").

**"Consultation":** request from the Holder of the Personal Data, from the persons authorized by him, or those authorized by law, to know the information that is in the Expatgroup.co Databases.

**"Anonymized Data":** data that does not personally identify the Holder and that can be used by Expatgroup.co for administration and statistical analysis, which includes trend analysis, personalized products and services, geolocation, risk assessment, and cost analysis and charges related to our services and solutions.

**“Personal Data”:** any information linked or that can be associated with one or more specific or determinable natural persons.

**“Private personal data”:** data that, due to its intimate or reserved nature, is only relevant to the Holder.

**“Semi-private Personal Data”:** data that is not of an intimate, reserved, or public nature and whose knowledge or disclosure may be of interest not only to its Holder but to a certain sector or group of people, or to society in general. (e.g., financial data, credit information, commercial activity or services, social security, etc.)

**“Public Data”:** is the data qualified as such according to the mandates of the law or the Political Constitution and all those that are not semi-private, private, or sensitive in accordance with Law 1266 of 2008. They are public, among others, the data relating to marital status, profession, quality of merchant or public servant and those that can be obtained without reservation.

**“Sensitive Data”:** data that affect the privacy of the Holder or whose improper use may generate discrimination, (e.g., data that reveals the racial or ethnic origin, political orientation, religious or philosophical convictions, membership in trade unions, social organizations, human rights or that promotes the interests of any political party or that guarantees the rights and guarantees of opposition political parties, as well as data related to health, sexual life and biometric data, such as fingerprints, among others).

**“In charge of the Treatment”:** natural or legal person, public or private, who performs the Treatment of Personal Data, based on a delegation made by the Treatment Manager, receiving instructions about the way in which the data should be managed.

**“Platform”:** refers to the website of “Expatgroup.co.”

**“Claim”:** request of the Holder or the persons authorized by him or by law to correct, update or delete his Personal Data or to warn that there is an alleged breach of the data protection regime.

**“Responsible for the Treatment”:** natural or legal person, public or private, that by itself or in association with others, decides on the purpose of the Database and/or the Treatment of the data.

**“Procedure Requirement”:** prior step that the Holder must complete before filing a complaint with the Superintendence of Industry and Commerce. This consists of a direct claim to the Person in Charge or Responsible for his Personal Data.

**“Holder”:** natural person whose Personal Data is subject to Treatment.

**“Treatment”:** any operation or set of operations on Personal Data such as the collection, storage, use, circulation, transfer, transmission, updating, or deletion of Personal Data, among others. The Treatment can be national (within Colombia) or international (outside Colombia).

**“Transmission”:** Processing of Personal Data that implies the communication of these within or outside of Colombia when its purpose is to carry out a Processing by a Manager and on behalf of the Responsible.

**“Transfer”:** Processing of Personal Data that takes place when the Person in Charge sends the Personal Data to a receiver, who in turn is Responsible for the Treatment and is located inside or outside the country.

2. **Scope.** This Policy applies to all personal information registered in the Databases of Expatgroup.co, who acts as Responsible for the Treatment of Personal Data for these purposes.
3. **Principles of the Treatment of Personal Data.** The Processing of Personal Data under this Policy will be guided by the principles of article 4 of Law 1581 of 2012 and the regulations that update or modify it. All activities related to the processing of Personal Data found in the Expatgroup.co Database must comply with the principles recognized by law and the jurisprudence of the Colombian Constitutional Court, which are summarized below:
  - **Principle of purpose:** the Treatment must have a legitimate purpose in accordance with the Constitution and the Law, which must be informed to the Holder.
  - **Principle of necessity and proportionality:** the Personal Data registered in the Database must be strictly necessary to fulfill the purposes of the Treatment. In this sense, they must be adequate, pertinent, and consistent with the purposes for which they were collected.
  - **Principle of temporality:** the period of conservation of the Personal Data in our Database must be that necessary to achieve the purpose for which we have collected them.
  - **Principle of freedom:** Treatment can only be exercised with the prior, express, and informed consent of the Data Holder. Therefore, Personal Data may not be obtained or disclosed without prior authorization, or in the absence of a legal or judicial mandate.
  - **Principle of veracity:** the information subject to Processing must be true, complete, accurate, up-to-date, verifiable, and understandable. The Processing of partial, incomplete, fragmented, or misleading data is not permitted.
  - **Principle of transparency:** in the Treatment, the Holder's right to obtain from Expatgroup.co, at any time and without restrictions, information about the existence of data that concerns him or her must be guaranteed.
  - **Principle of access and restricted circulation:** Personal Data, except for public information, can only be on the Internet when access is technically controllable to grant restricted knowledge only to the Holders of Personal Data or authorized third parties.
  - **Principle of security:** The Person in Charge of the Processing of Personal Data must comply with all the technical, human, and administrative measures necessary to provide security to the records, avoiding their adulteration, loss, consultation, use or unauthorized or fraudulent access.
  - **Principle of confidentiality:** all persons involved in the Processing of Personal Data that are not of a public nature, are obliged to guarantee the confidentiality of the information, even after the end of their relationship with any of the tasks that includes the Treatment.

- **Non-discrimination:** it is forbidden to do any act of discrimination based on the information collected in the Databases or files.
  - **Repair:** it is an obligation to compensate the damages caused by failures in the Processing of Personal Data.
  - **Principle of limitation in the collection:** only the Personal Data that is strictly necessary for the fulfillment of the purposes of the Treatment should be collected, so the registration and disclosure of data that are not closely related to the objective of the Treatment is prohibited. Consequently, everything possible should be done to limit the processing of Personal Data to the minimum necessary. That is, the data must be: (i) adequate, (ii) pertinent and (iii) consistent with the purposes for which they were provided.
4. **Validity of the Policy.** This policy is effective from August 2022.
5. **Current legislation:** The current national legislation on the Protection of Personal Data is Law 1581 of 2012, Law 1266 of 2008, Decree 1377 of 2013, Decree 1074 of 2015 and the regulations that regulate, replace, or modify them.
6. **Application of guarantees and rights of the regulation established in regulation (EU) 2016/679:** If Expatgroup.co has operations and acts that are the object and competence of the regulation of the European Union in terms of Protection of Personal Data, in its capacity as Responsible, will guarantee the exercise of the prerogatives, guarantees and rights conferred in Regulation (EU) 2016/679. For the purposes, the Holder must state in his claim or request the reasons and facts that support the application of such regime. Likewise, prior to the use of the Platform, the Holder must inform Expatgroup.co of this situation, through the channels enabled for such purposes. In any case, in application of the regime, Expatgroup.co will guarantee the exercise of the rights of restriction of processing, objection to processing and portability of personal data, when requested by the Holders and in the events of their origin from according to regulation.

## CHAPTER II

### PERSONAL DATA PROCESSED AND METHODS OF OBTAINING

7. **Data Collection.** In general, Expatgroup.co collects the Personal Data of the Holders in the following cases:
- When Holders visit some of our websites and use our services.
  - When Holders voluntarily provide Personal Data, for example, by signing up to Expatgroup.co emails, registering their account on one of the Expatgroup.co Websites, completing a web form to obtain business information, responding to the BOT through WhatsApp, or registering to access Expatgroup.co services by any means or communication channel enabled.
  - When Cardholders use Expatgroup.co services.

- When Expatgroup.co requires approaching the Holders to provide or request new services.
- When Expatgroup.co hires third-party services that use Cookie data or similar targeted technologies, to advertise ads according to characteristics that we have in common with the Owner, such as the industry in which they work.
- When the Holders interact with the Platform and accept the notice of Cookies or similar technologies.
- When Expatgroup.co informs you in advance about the collection and intended use of your data, through this Policy or at the time of collection.

8. **Personal Data collected.** Expatgroup.co may expressly request Personal Data from its Holders or collect them based on their behavior, except for the exceptions related to Sensitive Data or data of children and adolescents, the data that is necessary to fulfill the purpose of the databases, which are -among others- the following:

**8.1. In relation to the database of employees and contractors:** they include but are not limited to name and surname, nationality, age, marital status, identification number, military card, professional card, handwriting, date, and place of birth, address of correspondence, contact telephone number, e-mail, employment, clinical or health, academic and patrimonial history, references, business history or biographical, financial, judicial, disciplinary and family information, and that related to other companies or public entities, recent photographs, occupational medical history, telephone, sex, place of work, position or profession of the spouse or permanent partner, all relevant information of employees and contractors and their relatives up to the fourth degree of consanguinity, second of affinity and/or first civil, and any other data that may be necessary to achieve the purposes described.

**8.2. In relation to the databases of customers, suppliers and business partners:** include, but are not limited to name and surname, identification number, date of birth, age, blood type, nationality, marital status, mailing address in Colombia and abroad, contact telephone number in Colombia and abroad, email, user in social networks (username); name, telephone number and relationship of an emergency contact, social security number, information related to your property, immigration, commercial, financial (including bank statements), legal, administrative, accounting and personal information that is shared on the occasion of the communications exchanged with Expatgroup.co, browsing history on the Platform, operating permits, authorizations to do activities related to the services, purchase history, history of open cases with customer service, commercial, judicial history, business and family relationships, and information related to other companies or public entities, needs and interests, place of work, qualifications and studies of suppliers, permits and authorizations required to provide services or sell products, name of the company, tax ID, description, and any other data that may be necessary to achieve the purposes described and the provision of the Services.

9. **Sensitive data and its treatment.** In accordance with Law 1581 of 2012, the following are considered sensitive data: racial or ethnic origin, political orientation, religious or philosophical convictions, membership of trade unions, social organizations, data related to health status, sexual life, and biometric data, or any other that may affect the privacy of the Holder or whose improper use may generate discrimination.

Considering the characteristics of Expatgroup.co, the activities it develops, and the purposes described in this Policy, Expatgroup.co may require the processing of some sensitive data, in the manner and conditions indicated throughout this document.

However, Expatgroup.co will only collect and process Sensitive Data in the cases permitted by law. For such events, the Holders are informed that they are not obliged to provide said data or to authorize its Treatment. Once said data has been provided and the corresponding consent has been granted, the data will be collected and processed only for the purposes described in this Treatment Policy, and such Treatment will only be carried out with qualified authorization.

In any case, the Holder must also implement the necessary diligence to maintain the confidentiality and security of their sensitive personal information.

10. **Personal data related to minors.** Expatgroup.co will use, store, and process the personal data of minors who are children, descendants or who depend on or are in charge of the clients, and which are of a public nature and/or those that are required to guarantee certain procedures. The purpose of said treatment will be to do the corresponding migratory requests before the Entities of the Colombian government.
11. **Image data.** By participating in any videoconference with Expatgroup.co, advice developed by video call, Webinars, and interviews conducted by Expatgroup.co, the Holders accept and authorize their names and images to appear in the programs, publications, and other advertising media and in general in all disclosure material for promotional or commercial purposes that Expatgroup.co wishes to do during the 50-year term, without this implying the obligation to remunerate or compensate them. Likewise, they waive any claim for image rights.

In the cases in which the Holders are present at the Expatgroup.co facilities, they will be informed that they are being recorded, and their express authorization will be requested to use their image for the benefit of the Expatgroup.co corporate purpose.

### CHAPTER III

#### PURPOSE OF PERSONAL DATA PROCESSING

12. **Generalities of the Purpose.** Expatgroup.co will carry out the Processing of Personal Data in accordance with the conditions established by the Holder, the law, or public entities for the

fulfillment of the activities of its corporate purpose. In general, Expatgroup.co will collect, store, organize, circulate, use, profile, transmit and transfer Personal Data in accordance with the purposes established below:

**A. Purpose of the Treatment of the Database of employees, contractors and aspiring employees, former employees, and staff of Expatgroup.co.**

The purpose of this Policy in relation to the Databases it manages regarding employees, contractors and aspiring employees, former employees and Expatgroup.co staff is:

- Preserve and manage the information of the labor, civil or commercial relationship of the Holders.
- Comply with the legal, accounting, commercial, and regulatory duties that apply it.
- Control and preserve the security of the people, goods, and information of Expatgroup.co.
- Comply with the purpose of the labor, commercial or civil relationship that has been acquired with the Holders.
- Protect the health of Expatgroup.co employees and contractors.
- Verify conflicts of interest in new employees or contractors of Expatgroup.co, as well as inabilities or incompatibilities of these.
- Comply with the corporate purpose of Expatgroup.co.
- Prevent and verify the commission of crimes or criminal behavior by employees, contractors, applicants, and personnel in general, for which different databases, restrictive lists, and sources, such as Police databases, may be consulted. National, Comptroller, Interpol, FBI, SDNT, as well as the corresponding social networks, in the form in which they are arranged.
- Maintain direct communication with the Holders for issues related to their employment, civil or commercial situation, and for contractual, informational, and commercial purposes.
- Select personnel, manage to hire, manage labor relations, grant benefits to its employees by itself or through third parties, as well as allow employees access to Expatgroup.co computer resources.
- Keep a record of disciplinary sanctions imposed on contractors and employees of Expatgroup.co.
- Carrying out statistical, commercial, financial, social, administrative, or technical analyses.
- Verification of the identity and criminal, disciplinary, financial, and credit history of the Holders.

- Transmit, transfer, and supply the information and Personal Data of the Holders to those third parties in charge of administering the social security system in Colombia, as well as to insurance companies.
- Save the historical memory and background of former employees.
- Transmit, transfer, and supply the information and Personal Data of the Holders to third parties, in those cases in which employer substitution occurs or in those cases in which Expatgroup.co assigns its contractual position, or when it is part of an acquisition process or business integration.
- Transmit, transfer, and supply the information and Personal Data of the Holders to third parties, to provide employment and/or professional references about the Holders.
- Transmit, transfer, and supply the information and Personal Data of the Holders to the parent company or other companies of the Expatgroup.co business group, for them to store, consult or act as Managers or Responsible for the personal data according to the case.
- For the evaluation and development of selection processes and their history.
- To give attention to queries, requests, actions, and claims, made by the Holder of the information or by their representatives or successors, or by entities of the general comprehensive social security system to which the Holder is or has been linked.
- To participate in public or private contracting processes, and meet the conditions or requirements of said contests, bids, public or private expressions of interest, public or private prequalification, presentation of proposals, and in general, the registration or participation in any selection process for public or private contracting.
- The socialization of policies, projects, programs, and organizational changes.
- To contact the Holder through the internet or telephone calls, physical and telephone correspondence, text message, WhatsApp, Instagram, Facebook, Twitter, LinkedIn, or any other social network and/or videoconference platform for the purpose of the contractual exercise.
- Offer corporate welfare programs and plan business activities, for the Holder and the beneficiaries of it (children, spouse, permanent partner, friend, and close).

**B. Purpose of the Treatment in relation to the database of current or potential suppliers and business partners.**

The purpose of this Policy in relation to the Databases that it manages regarding suppliers and business partners of Expatgroup.co is:

- Comply with the corporate purpose of Expatgroup.co.



- Carrying out statistical, commercial, strategic, financial, social, and technical analyses.
- The development, execution, and fulfillment of the contractual relationship that the Holder has with Expatgroup.co.
- Comply with the value proposition and the level of service offered to each segment of users and providers.
- Comply with legal, accounting, commercial and regulatory duties.
- Communication with the Holders for contractual, informative, and commercial purposes.
- The control and preservation of the security of the people, goods, and information of Expatgroup.co, for which different databases and sources may be consulted, such as databases of the National Police, Comptroller, Interpol, FBI, SDNT list (or "Clinton List"), restrictive lists, credit risk centers, as well as the Holder's social networks, in the form in which they are arranged.
- Verification of the identity and information in general, and criminal, disciplinary, financial, and credit history of the Holders.
- Transmit, transfer and supply the information and Personal Data of the Holders to the subsidiaries, or affiliated companies of Expatgroup.co, as well as to commercial allies or to other companies or national and/or international persons that Expatgroup.co commissions to carry out the Treatment of the information and comply with the purposes described in this Policy and the object of the commercial or civil relationship with the Holders, or for said third parties to assume the position of Responsible.
- Transmit, transfer, and supply, free of charge or for a fee, the information and Personal Data of the Holders to national and/or international commercial allies so that they can contact the Holders to offer them their products, information, or services that, in the opinion of the Company, may be of interest to the Holder.
- Transmit, transfer, and supply the information and Personal Data of the Holders to national and/or international third parties, in those cases in which it participates in processes of merger, integration, spin-off, liquidation, acquisition, and/or disposal of assets.
- Transmit, transfer, and supply the information and Personal Data of the Holders to the companies with whom Expatgroup.co outsources its accounting processes.
- Carry out marketing activities, such as market studies, and carry out acts of promotion of services, among other similar concepts.
- The socialization of policies, projects, programs, and organizational changes.
- Diffusion of cases handled by Expatgroup.co that has been successful and representative.
- Transmit, transfer, and supply the information and personal data of the Holders to national or international third parties, in those cases in which Expatgroup.co is interested in selling or marketing the data in any way as an asset or of a commercial nature.
- To make reports before the databases of credit information operators and of a commercial nature.

- To manage the payment of remunerated sums, commissions, discounts, and withholdings of a tax or parafiscal nature.
- Transmit, transfer, and supply, free of charge or for a fee, the information, and Personal Data of the Holders to national and/or international government entities for the projects managed by such entities.
- Make invitations to events, improve services, and all those activities associated with the commercial relationship or existing link with Expatgroup.co or the one that may have.
- For the evaluation and development of supplier selection processes and their history.
- To contact the Holder through the internet or telephone calls, physical and telephone correspondence, text message, WhatsApp, Instagram, Facebook, Twitter, LinkedIn, or any other social network and/or videoconference platform for the purpose of contractual development or social object.
- Contact the Holder via email to send extracts, account statements, or invoices in relation to the obligations arising from the contract entered between the parties.
- To execute actions of commercial profiling, prospecting, consumption habits, analytics, identification of marketing trends, the definition of patterns, and artificial intelligence tasks, among other methods of using data with the purpose of improving the products and/or services to offer.
- Provide contact information to the commercial force and/or distribution network, Digital Marketing, market research, and any third party with which Expatgroup.co has a contractual link for the development of such activities.

**C. Purposes of the Treatment in relation to the database of future, eventual, current, and former shareholders:**

- The development, execution, and fulfillment of the contractual relationship that the Holder has with Expatgroup.co.
- Comply with legal, accounting, commercial and regulatory duties, and requirements for information from public authorities.
- Carrying out statistical, commercial, strategic, financial, social, and technical analyses.
- Communication with the Holders for contractual, informative, and commercial purposes.
- Comply with legal, accounting, commercial and regulatory duties.
- Transmit, transfer, and supply the information and personal data of the Holders to the subsidiaries, or affiliated companies of Expatgroup.co, business partners, or other national and international companies or individuals that Expatgroup.co commissions to process the information and comply

with the purposes described in this Policy and the object of the commercial or civil relationship with the Holders, or for said third parties to assume the position of Responsible.

- To preserve the security of Expatgroup.co, analyze and verify the information of Expatgroup.co shareholders.
- Transmit, transfer, and supply the information and Personal Data of the Holders to national and/or international third parties, in those cases in which Expatgroup.co participates in processes of merger, integration, spin-off, liquidation, and/or disposal of assets.
- To verify employment, professional, commercial background, and any reference that concerns your professional and commercial suitability.
- Verification of the identity and criminal, financial, and credit disciplinary records of the Holders.
- The control and preservation of the security of the people, goods, and information of Expatgroup.co, for which different databases and sources may be consulted, such as databases of the National Police, Comptroller, Interpol, FBI, SDNT list (or "Clinton List"), restrictive lists, credit risk centers, as well as the Holder's social networks, in the form in which they are arranged.
- For the exercise of development of the rights of the shareholder and the operation of the general meeting of shareholders.

#### **D. Purposes of the Treatment in relation to the customer database.**

- The development of the economic activities of Expatgroup.co.
- Communication with the Holders for contractual, informative, or commercial purposes.
- Comply with legal, accounting, commercial and regulatory duties.
- The control and preservation of the security of the people, goods, and information of Expatgroup.co.
- The socialization of policies, projects, programs, and changes.
- Diffusion of cases handled by Expatgroup.co that has been successful and representative.
- Define consumption profiles of its users, to perform statistical analysis or improve the marketing and sales processes of Expatgroup.co services.
- Carrying out statistical, commercial, strategic, financial, social, technical, and risk rating analyses.
- Comply with the corporate purpose of Expatgroup.co and comply with the contractual or civil purpose with the Holders.

- Prevent and counteract a possible reputational risk that could affect Expatgroup.co, for which different databases and sources may be consulted, such as databases of the National Police, Comptroller, Interpol, FBI, SDNT list (or “Clinton List”), SARLAFT, as well as the social and corresponding networks, in the form in which they are arranged.
- To carry out studies and marketing and advertising strategies.
- Transmit, transfer, and supply, free of charge or for a fee, the information, and Personal Data of the Holders to national and/or international government entities for the projects managed by such entities.
- To carry out marketing tasks and send advertising for Expatgroup.co and/or Third-Party business partners.
- To optimize the functionalities of the Platform.
- To carry out user profiling studies.
- For security purposes, service improvement, and service experience, Personal Data may be used, among others, as evidence in any type of process.

## CHAPTER IV

### AUTHORIZATION FOR THE COLLECTION AND PROCESSING OF PERSONAL DATA

13. **Manifestations of the Holders of the Personal Data.** At the time of voluntarily supplying the data and/or granting express verbal or written authorization, the Holder states that:

- Through the voluntary provision of any of the Personal Data in the manner indicated in the Policy, the express verbal or written Authorization, the fill out of any of the forms provided through the website, the use of our Landing Pages and/or social networks, the registration or creation of a profile or account on the Platform in the event that this option is enabled, or the authentication or entry to the Platform through authentication with the owner's account subscribed to a third party, including, but not limited to Microsoft, Google or Facebook, the Holder expressly and unequivocally authorizes Expatgroup.co to collect Personal Data and any other information provided, as well as to carry out the Treatment of his Personal Data, in accordance with this Policy and the law.
- Authorize Expatgroup.co to ask him, when required by applicable laws, to provide the express consent for direct, electronic, and online marketing activities, and for the use of Cookies or similar technologies. If necessary, Expatgroup.co will request express consent to collect and use Personal Data as indicated in this Policy. Such consent will be requested on the Platform, or the form used to collect personal data or to confirm registrations or preferences.

- Authorizes Expatgroup.co in some cases to ask him to confirm the consent through a link in a follow-up email, to have a double authorization to carry out the collection and Processing of the data.
- Was informed and understands that Sensitive Data are those that affect the privacy of the Holder or whose improper use can generate discrimination. Likewise, they can be identified as those of racial or ethnic origin, political orientation, religious or philosophical convictions, union membership, social organizations, data related to health status, sexual life, and biometric data.
- Was informed that, in the event of collecting sensitive information, have the right not to answer the questions that are asked and not to deliver the requested data.
- Was informed about the purposes for which the sensitive data collected will be used, which are described in this Policy.
- Has been informed and understands the security measures that Expatgroup.co implements to protect the Personal Data that it collects and, therefore, you accept.
- Was informed about the rights in relation to your Personal Data and mechanisms to exercise them.

**14. Term of the Authorization.** The term of the Authorization for the Treatment of Personal Data will be from the moment the Authorization is granted, until the day that Expatgroup.co is dissolved and liquidated or until the end of the purpose for which the Personal Data was collected.

**15. Authorization for the Treatment of Sensitive Data or of minors.** When it comes to the collection of Sensitive Data or minors, the following requirements must be met:

- The authorization must be explicit.
- The Holder must be informed that he is not obliged to authorize the Treatment of said information.
- The Holder must be informed explicitly and in advance which data that will be processed is sensitive and its purpose.
- Authorization is required from the Responsible for the Treatment of data of children and adolescents.

**16. Authorization for new uses or purposes.** Expatgroup.co may request Authorization from the Holders for new uses of their Personal Data or information, for which it will publish the changes in this Treatment Policy on its website, or in any channel, depending on the case.

## CHAPTER V

### PROCESSING OF PERSONAL DATA STORED IN EXPATGROUP.CO DATABASES

17. **Uses under the Policy.** Expatgroup.co will only treat the Personal Data and other information of the Holders for the purposes described and the uses authorized in this Policy or in the current laws. In addition to what is mentioned in other sections, the Holder expressly authorizes Expatgroup.co to Process their Personal Data and other information for the following purposes and in the following circumstances:

- Establish communication between Expatgroup.co and the Holders for any purpose related to the purposes established in this Policy, either through calls, text messages, emails, and/or physical mail.
- Audit, study and analyze the information in the Databases to design and execute administrative, labor, security, and financial strategies related to Expatgroup.co personnel.
- Provide the information and Personal Data of the Holders to the subsidiaries, or affiliates of Expatgroup.co, business partners, or other companies or persons that Expatgroup.co commissions to process the information and comply with the purposes described in this Policy and the purpose of the labor, commercial or civil relationship with the Holders.
- To preserve the security of Expatgroup.co, analyze and verify the information of employees, contractors, and collaborators of Expatgroup.co and of those who participate in selection processes.
- Transfer, transmit and supply, free of charge or for a fee, the information and Personal Data of the Holders to national and/or foreign commercial allies, as well as corresponding government entities so that they can contact the Holders to offer them their products, information or services that, in the opinion of Expatgroup.co, may be of interest to the Holder.
- Transfer, transmit and supply the information and Personal Data of the Holders to third parties, in those cases in which Expatgroup.co participates in merger, integration, spin-off, acquisition, and/or liquidation processes.
- Verify conflicts of interest or irregularities with the new contractors, allies, suppliers, users, and/or employees of Expatgroup.co.
- Perform financial, legal, commercial, and security risk rating.
- Consult, store, and use the financial information obtained from third-party database administrators, with prior authorization from the Holder for said consultation.
- Combine Personal Data with information obtained from other partners or companies or send it to them to implement joint business strategies.
- When the information must be disclosed to comply with laws, regulations, or legal processes, to stop or prevent fraud, attacks on the security of Expatgroup.co or others, as well as to prevent technical problems or protect the rights of others.

- Audit, study and analyze the information in the Databases to design commercial strategies and increase and/or improve the services offered by Expatgroup.co.
- Audit, study, analyze and use the information in the Databases to design, implement and develop programs, projects, and events.
- Carry out marketing activities for the services offered, within the framework of direct marketing activities. Expatgroup.co warrants that any direct marketing or market research you receive or are contacted about by email will provide easy means for you to no longer receive such email communication. For example, in the email, Expatgroup.co will provide you with an "unsubscribe" link or an email to submit an opt-out request. In these cases, the Personal Data will not necessarily be removed from the Databases, but the change in direct marketing preferences will be considered and respected.
- Inform about the scope and characteristics of Expatgroup.co services, as well as promotions and offers.
- Administer our Sites and Account Holders' accounts, analyze trends and improve the functionality of our Platform.
- Customize our Sites and some third-party websites based on your selected preferences and personalize and enhance your online experience, which may include targeted advertisements about our services and solutions so that you receive relevant information. To display targeted digital advertisements on third-party websites, Expatgroup.co uses advertising networks.
- Consider a job application sent by the Holder.
- As deemed necessary for Expatgroup.co to protect its legal rights and property, as well as to protect other users of the Platform or third parties, or to prevent personal injury or loss.
- Generate potential customers and/or users (identify the particular interest that a potential customer and/or user has in our services).
- Invite the Holders to make comments or participate in user surveys, better understand the nature and quality of the provision of Expatgroup.co services, as well as improve and develop products, services, and solutions.
- Sharing information with selected service providers and subcontractors who provide services on behalf of Expatgroup.co, such as marketing and advertising services, including telemarketing, to whom information is provided, such as information collected about users through Cookies or similar technologies to generate and deliver advertisements for more relevant and useful services and solutions.

- Share information with government authorities or regulatory entities as required by applicable law or in accordance with an administrative, court, or similar order.

- Any other use that falls within the purposes already stated and that is related to the corporate purpose of Expatgroup.co and its activity.

18. **Abstention of Treatment of Data referred to criminal records.** Expatgroup.co will refrain from processing Personal Data that concerns the criminal record of individuals. However, you can verify the public databases, where this type of information is recorded, with the exclusive purpose of guaranteeing the legality of its operations and the security of Expatgroup.co and its employees.

The Holders understand and accept that in certain cases, due to the type of visa for which they are applying, the government entity may require a criminal record certificate from the home country and/or residence country of the Holder, for which Expatgroup.co will be in charge of handling and processing said information for the purpose informed to the Holder.

19. **Security measures for the protection of Personal Data and other information.** The security measures used by Expatgroup.co seek to protect the Holders' data to prevent its adulteration, loss, use, and unauthorized access. For this, Expatgroup.co diligently implements human, administrative, and technical protection measures that are within its reach. The Holder expressly accepts this form of protection and declares that he considers it convenient and sufficient for all purposes.

20. **Policy for the elimination and/or deletion of Personal Data.** Expatgroup.co under the principles of purpose, necessity, proportionality, and temporality, will carry out the Treatment of Personal Data of the Holders. Once the purpose of said Treatment has been fulfilled and if necessary, Expatgroup.co will proceed to the deletion or elimination of the data of the Holders, in accordance with the following parameters:

i. Expatgroup.co will evaluate the information of the Holders every six months, and according to its characteristics and its status, will proceed to choose those data that should be deleted. For the purposes, it will consider if there are rights in the head of the Holders that prevent the deletion of the data or if there are legal, contractual, or constitutional duties that prevent the elimination.

ii. Expatgroup.co will previously inform the Holders of the decision and the basis for the deletion of their Personal Data, and they through the enabled channels, may exercise their right to file queries, requests or claims regarding said decision within fifteen (15) working days. Inquiries, requests, or claims will follow the procedures established in this Policy. If there is no claim or request in relation to the decision, the deletion will proceed.

iii. Expatgroup.co will raise the corresponding minutes and records regarding the processes of deletion and elimination of the Personal Data of the Holders, for the purposes of traceability of the procedure.



21. **Privacy Notice.** Through the Privacy Notice, the Holder is informed regarding the existence of the policies and procedures for the Treatment of Personal Data contained in this Policy, as well as the characteristics of the Treatment that will be given to the Personal Data, and will contain, when least, the following information: (i) identity, address and contact information of the Data Responsible; (ii) type of Treatment to which the Personal Data will be subjected and its purpose; and (iii) the general mechanisms provided by the Responsible Party so that the Holder knows the Treatment Policy and the mechanisms for consulting the Personal Data of the Holder.

Expatgroup.co will keep a copy of the Privacy Notice model that is transmitted to the Holders while the Processing of Personal Data is carried out and the obligations derived from it endure. For the storage of the model, Expatgroup.co or whoever it designates may use computerized, electronic means or any other technology. The Privacy Notice for the Treatment of Personal Data is for the provision and consultation through the Platform.

22. **Use of Cookies or similar technologies.** The Holder accepts that Expatgroup.co may use Cookies and other similar technologies, both in the Platform, its contents, services, and in the emails sent, with the purpose of, among others, authentication purposes, register activities on the Platform, improve its functionality, optimize the services offered, analyze market trends, analyze the demographic information of those who visit the Platform and make use of the services it offers, evaluate the effectiveness of the advertising, consumption behavior of the users of the Platform and the result of the activities executed there, determine who has opened the email sent and the format in which they do so. These tools allow obtaining, among others, information regarding the type of browser and the operating system used, the IP address, the time spent on the Platform and the number of visits made to the Platform, the use of the website, among others.

The Holders can configure their browser to disable and delete cookies, in which case, although the Platform may continue to be visited, access to certain features of the Platform may be restricted.

23. **Automated Personal Data Processing.** Expatgroup.co may carry out the Processing of Personal Data in an automated manner and could use artificial intelligence applications to achieve efficiency in its processes.

However, the Personal Data under an automation process is not used to make individual decisions about the rights of individuals and is not the only reference for decisions that govern Expatgroup.co's Processing of Personal Data.

In any case, if profiling studies are carried out that may eventually affect the Holders, Expatgroup.co will inform the Holders and guarantee their right to object to the Treatment in question and its results.

## CHAPTER VI

### RIGHTS OF THE HOLDERS, PROCEDURE TO EXERCISE THEM AND INSTANCES OF ATTENTION TO THE HOLDERS

**24. Right of the Holders in general.** The Holders have the right to know, update, rectify their information, and/or revoke the authorization for their Treatment. In particular, the rights of the Holders as established in article 8 of Law 1581 of 2012, are the following:

- Know, update, and rectify your Personal Data. For this purpose, it is necessary to previously establish the identification of the person to prevent unauthorized third parties from accessing the Holder's data.
- Request proof of the authorization granted, except in one of the cases in which the authorization is not necessary, in accordance with the provisions of article 10 of Law 1581 of 2012.
- Be informed, upon request, regarding the use we have given to your Personal Data.
- Submit complaints to the Superintendency of Industry and Commerce for violations of the provisions of the law and other regulations that modify, add, or complement it.
- Revoke the authorization and/or request the deletion of the data.
- Free access to your Personal Data that has been subject to Processing.
- Move, copy, or transfer personal data from one controller to another, in a secure, readable, and commonly used format (portability right).
- Refrain from answering the questions about Sensitive Data or data on children and adolescents. In this case, the Holders, or their respective legal representatives, are informed that they are not obliged to provide authorization for the processing of sensitive data or data of children and adolescents.
- The request for deletion of the information and the revocation of the Authorization will not proceed when the Holder has a legal or contractual duty to remain in the Database of the Responsible Party.

**25. Procedure to exercise your rights.** If the Holder wishes to exercise their rights, they must send an email to [legalservices@expatgroup.co](mailto:legalservices@expatgroup.co), which will be handled by the data protection area of Expatgroup.co. Said mail must be addressed to EXPATGROUP.CO S.A.S. and the following must be specified: (i) name and identification of the Holder or the legitimate person; (ii) accurate and complete description of the facts giving rise to the Claim; (iii) claims, (iv) electronic address to send the answer; and (v) documents and other pertinent evidence that you want to assert.

The procedure to be followed for said communication will be as follows:

- When the Holder of the data or his successors in title wish to consult the information that rests in the Database, Expatgroup.co will respond to the request within a maximum period of ten (10) days. In compliance with the provisions of Law 1581 of 2012, when it is not possible to attend the consultation within said term, the Holders will be informed, the reasons for the delay will be expressed and the date on which their consultation will be attended will be

indicated, which may not exceed five (5) working days following the expiration of the first term.

- When the Holder or his successors in title consider that the information contained in the Databases should be subject to correction, update, or deletion, or when they notice the alleged breach of any of the duties contained in Law 1581 of 2012, they may file a claim before Expatgroup.co, which will be processed under the following rules:

- o The claim will be made through a request addressed to Expatgroup.co with the identification of the Holders, the description of the facts that give rise to the claim, the address, and the documents that are to be verified will be attached. If the claim is incomplete, Expatgroup.co may require the interested party within five (5) days after receipt of the claim to correct the faults. After two (2) months from the date of the request, without the applicant submitting the required information, it will be understood that he has withdrawn the claim.

- o In the event that Expatgroup.co is not competent to resolve the claim, it will transfer it to the appropriate party within a maximum period of two (2) working days and will inform the Holder of the situation, with which expatgroup.co will be released from any claim or responsibility for the use, rectification, or deletion of data.

- o Once the complete claim is received, a legend will be included in the Database that says "claim in process" and the reason for it, in a term not exceeding two (2) working days. Said legend must be maintained until the claim is decided.

- o The maximum term to address the claim will be fifteen (15) working days from the day following the date of receipt. When it is not possible to attend the claim within said term, the Holder will be informed of the reasons for the delay and the date on which his claim will be attended, which in no case may exceed eight (8) working days following the expiration of the first finished. The withdrawal or deletion will not proceed when there is a contractual duty to remain in the Expatgroup.co Database.

26. **Complaints before the Superintendence of Industry and Commerce:** The Holder, his assignees or attorneys-in-fact, must use the consultation process with Expatgroup.co or whoever it designates, prior to filing any complaint with the Superintendency of Industry and Commerce as a Procedural Requirement.

27. **Duties of Expatgroup.co in its capacity as Responsible for the Treatment of Personal Data.** Expatgroup.co is obliged to fulfill the duties imposed by law. Therefore, must act in such a way that complies with the following duties:

- Guarantee the Holder, always, the full and effective exercise of the rights mentioned in this Policy.

- Observe the principles established in this policy in the Processing of Personal Data.
- Keep the information under the necessary security conditions to prevent its adulteration, loss, consultation, use, or unauthorized or fraudulent access.
- Update information when necessary.
- Rectify Personal Data when appropriate.
- Provide the Person in Charge of Treatment only with Personal Data whose Treatment is previously authorized.
- Guarantee that the information provided to the Treatment Responsible is true, complete, accurate, updated, verifiable, and understandable.
- Communicate in a timely manner to the Person in Charge and/or Responsible for the Treatment, of all the news regarding the data that has previously been provided and adopt the other necessary measures so that the information provided to him is kept up to date.
- Inform the Person in Charge of the Processing in a timely manner of the rectifications made to the Personal Data so that he/she proceeds to make the pertinent adjustments.
- Always require the Treatment Responsible to respect the security and privacy conditions of the Holder's information.
- Inform the Person in Charge of Treatment when certain information is under discussion by the Holder once the claim has been submitted and the respective procedure has not been completed.
- Inform the Superintendency of Industry and Commerce when there are violations of the security codes and there are risks in the administration of the Holders' information.
- Comply with the instructions and requirements issued by the Superintendence of Industry and Commerce.

## CHAPTER VII

### MIXED

28. **Contact.** Any questions or additional information will be received and processed by sending them to the contact addresses established in this Policy.
29. **Changes in the policy of Treatment and protection of Personal Data.** C Any substantial change in the Policy will be promptly communicated to the Holders by publishing it on the Expatgroup.co website.

30. **Confidentiality, fundamental rights, and anonymization of Personal Data.** Expatgroup.co is respectful of the fundamental rights to privacy, freedom of expression, and the good name and honor of the Holders of its Databases, which is why, for the purposes of guaranteeing such rights, it will take the measures that consider relevant in terms of confidentiality, such as the following:
- i. Expatgroup.co will refrain from partially or totally disclosing the confidential information received to any natural or legal person, government, or private entities, which has not been previously authorized.
  - ii. Expatgroup.co will refrain from using, exploiting, employing, publishing, or disclosing confidential information in a manner other than that authorized in this Policy.
  - iii. Expatgroup.co will instruct all those people who eventually have access to confidential information about the manipulation, use, management of security measures, and others, so that said information remains effectively managed and protected.
  - iv. The use of confidential information will be carried out by observing the principles of ethics and good practices regarding the protection of Personal Data. For this, Expatgroup.co expressly states that uses all the means to prevent this irregular or unauthorized use of confidential information.
  - v. Expatgroup.co will carry out the anonymization of the Personal Data of the Holders when considering that they may affect their right to privacy, good name, and honor. In any case, Expatgroup.co, at the request of the Holders and presenting the reasons for it, will carry out the corresponding anonymization of any Personal Data.
  - vi. Expatgroup.co will not censor the personal information of the Holders, if it is within the framework of good customs, the law, and the constitution, guaranteeing the fundamental right of the Holders to their freedom of expression.
31. **Conditions to which Sensitive Data is subjected.** Expatgroup.co will apply the necessary measures to carry out the Treatment of Sensitive Data of the Holders in accordance with the provisions of Law 1581 of 2012, which is why expatgroup.co will refrain from carrying out the Treatment of Personal Data that is not authorized by the Holder. Likewise, expatgroup.co will implement the necessary security and confidentiality measures to avoid any incident and/or violation of said information. The Treatment will be exceptional and in accordance with the Treatment and the purposes stipulated in the qualified authorization and in accordance with the principle of demonstrated responsibility. In any case, the Holder must implement the necessary diligence to maintain the confidentiality and security of their sensitive personal information.
32. **Information accuracy and quality policies.** In the development of the principle of truthfulness and quality of information, Expatgroup.co will take the necessary measures so that the information contained in its Databases is true, complete, accurate, updated, verifiable, and understandable. For this reason, expatgroup.co requests the Holders the information that is

necessary and comprehensive for the purposes of the respective Treatment. Likewise, Expatgroup.co will request the necessary supports, so that the information in its Databases is verifiable and true. For the above purposes, Expatgroup.co will implement the following measures:

- i. Expatgroup.co will take all measures so that, in the collection of the information of the Holders, complete, exact, updated, verifiable, and understandable information is obtained. In this sense, will implement due diligence measures in the means of data collection for such purposes.
  - ii. Expatgroup.co will offer update forms to the Holders so that they update their Personal Data when will be pertinent.
  - iii. Expatgroup.co will refrain from carrying out the Treatment of Personal Data of the Holders, with partial, incomplete, fractional, or confusing information.
  - iv. Expatgroup.co will verify the identity of the Holders and the information that is provided, requesting the accreditation documents that are necessary in each case, being able to request, among others, the following: Citizenship ID, Rut, judicial and police records, credit history, certifications from private and/or public entities.
  - v. Expatgroup.co will conduct semi-annual audits on the veracity and quality of its information, if Expatgroup.co finds irregularities and/or shortcomings in it, will require the Holders to provide the information and supports that are necessary.
33. **Comprehensiveness.** All those corporate policies of Expatgroup.co that are related to it are understood to be incorporated into this Policy.