

Information Processing Policies

Asimetrix S.A.S Database

Preliminary Aspects

ASIMETRIX S.A.S. – hereinafter “ASIMETRIX,” aware of the importance that personal data holds for its owners and the responsibility it has assumed with respect to such data as a result of the information processing activities carried out in the execution of its corporate purpose, makes available to interested parties its personal information processing policies, in compliance with the provisions of Article 2.2.2.25.3.1 of the Single Decree for the Commerce, Industry, and Tourism Sector, DU 1074 of 2015 (Decree 1377 of 2013, Article 13).

1. OUR CONTACT INFORMATION

ASIMETRIX, responsible for processing the personal information that comprises its databases, is domiciled in the city of Medellín, Antioquia, with its main office at Carrera 43 A # 16 A Sur 38 OF 402, Medellín, Colombia, phone number 6046041500, and email address rut.asimetrix@asimetrix.co.

2. PURPOSE OF OUR POLICIES

This document aims to regulate the activities related to the processing of personal data that comprises ASIMETRIX's databases, mainly concerning its purpose, the rights of the personal data owners, the commitments made by ASIMETRIX with the data owners, in its capacity as Controller or Processor (as applicable), and the tools adopted to allow the data owners to exercise their rights adequately.

3. REGULATORY FRAMEWORK

For situations not regulated by ASIMETRIX's Information Processing Policies, the provisions of laws 1581 of 2012 and 1266 of 2008 and regulatory decrees 1377 of 2013 and 1727 of 2009, compiled in DU 1074 of 2015, shall apply.



4. DEFINITIONS

For interpretative purposes and to provide a better understanding of ASIMETRIX's Information Processing Policies, the following definitions are adopted:

4.1. Authorization

Prior, express, and informed consent granted by the data subject for their data to be subject to a processing activity.

4.2. Database

An organized set of personal data subject to processing.

4.3. Personal Data

All information linked to or that may be associated with one or more identified or identifiable natural persons, which make up ASIMETRIX's databases.

4.4. Private Data

Data that, due to its intimate or reserved nature, is only relevant to the data subject.

4.5. Public Data

Data that is semi-private, private, or sensitive. Public data includes, among others, information related to a person's marital status, profession or occupation, and their status as a merchant or public servant.

4.6. Semi-private Data

Data that is not intimate, reserved, or public in nature, and whose knowledge or disclosure may be of interest not only to the data subject but also to a certain sector or group of people.

4.7. Sensitive Data

Data that affects the data subject's personal privacy or that, if misused, may lead to discrimination.

4.8. Biometric Data

Any data related to a person's physical, physiological, or behavioral characteristics that facilitates their identification.

4.9. Data Processor

A natural or legal person who, by themselves or in association with others, carries out the Processing of personal data on behalf of the Data Controller.



4.10. Data Controller

A natural or legal person, public or private, who, by themselves or in association with others, decides on the database and/or the Processing of data.

4.11. Data Subject

The natural or legal person whose data, being subject to processing, is part of ASIMETRIX's databases.

4.12. Processing

Any operation or set of operations carried out by ASIMETRIX on the personal data that make up its databases, such as the collection, storage, use, circulation, or deletion of such data.

4.13. Data Transmission

Processing of personal data that involves its communication within or outside the territory of the Republic of Colombia when the purpose is to carry out Processing by the Processor on behalf of the Controller.

4.14. Data Transfer

Data transfer occurs when the Controller and/or Processor of personal data, located in Colombia, sends the information or personal data to a recipient who is also a Data Controller and is located either inside or outside the country.

5. PRINCIPLES OF INFORMATION PROCESSING

For the proper processing of personal data, in all actions carried out by ASIMETRIX involving the information that makes up its databases, as well as in the interpretation and execution of these policies, the following principles shall be observed:

5.1. Principle of Legality

Throughout all stages and activities of data Processing by ASIMETRIX or by any party designated as Data Processor, the provisions of this policy shall apply, along with the regulations described in Section 3 and any that may regulate, add to, modify, or repeal them.

5.2. Principle of Purpose

In the processing of personal information from ASIMETRIX's databases, activities shall be carried out that are related to the purpose established in Section 9.



5.3. Principle of Freedom

The processing activities to which personal data governed by this policy will be subject shall only be carried out when the data subject has granted prior or express authorization for such purpose, except in cases where, pursuant to Article 10 of Law 1581 of 2012, authorization is not required.

The foregoing does not prevent the data subject from requesting the deletion of their personal data at any time, as established in Section 15.6.

5.4. Principle of Truthfulness or Quality

ASIMETRIX commits to ensuring that the information in its databases is truthful, complete, accurate, up-to-date, verifiable, and understandable. Consequently, it shall refrain from processing partial, incomplete, fragmented data, or data that may lead to error.

To this end, ASIMETRIX provides the data subjects with the mechanisms described in Sections 16, 17, and 18 of this document, which are intended to guarantee that the data subjects may, at any time, request the correction, updating, or deletion of their information.

5.5. Principle of Transparency

ASIMETRIX has adopted suitable mechanisms to ensure that the data subject may, at any time and without restriction, obtain information regarding the existence of data concerning them.

5.6. Principle of Restricted Access and Circulation

Access to the information contained in ASIMETRIX's databases is restricted to specialized personnel who have been properly trained in handling this type of information. ASIMETRIX does not publish personal data subject to processing on the internet or through other mass media or public communication channels.

5.7. Principle of Security

ASIMETRIX has implemented a series of technical, human, and administrative measures, appropriate to the nature of the data being processed, to prevent such data from being altered, lost, consulted, used, or accessed by unauthorized personnel.



5.8. Principle of Confidentiality

ASIMETRIX has adopted a protocol that guarantees the data subjects whose information is part of its databases that any individuals involved in the processing of their personal data shall maintain confidentiality regarding such information, even after the processing activities have ended or their contractual relationship with ASIMETRIX has concluded.

PROCESSING OF PERSONAL DATA

6. WHEN WE REQUEST YOUR AUTHORIZATION

As a general rule, the data processing activities regulated by this policy shall be carried out on personal data whose data subjects have granted their prior, express, and informed authorization.

Notwithstanding the foregoing, ASIMETRIX reserves the right to carry out processing activities on information for which authorization is not required, in accordance with the legal provisions governing the matter. In such cases, the commitments assumed by ASIMETRIX toward the data subjects, as established in this policy, shall remain fully applicable.

For the relevant purposes, it is important to highlight that ASIMETRIX may use any of the following modalities for obtaining the data subject to processing:

6.1. Data collected directly by ASIMETRIX

ASIMETRIX retains a copy of the authorizations granted by each data subject whose information is part of its databases.

6.2. Data provided by third parties

In addition to personal data collected directly by ASIMETRIX from the data subject, there are occasions when ASIMETRIX obtains personal data from databases provided by third parties who have previously obtained the data subject's authorization.

7. LEVEL OF INVOLVEMENT

As a general rule, ASIMETRIX acts as the Data Controller, as stated in Sections 1 and 4.10 of this policy. However, depending on the specific circumstances of certain databases, the purposes pursued through their processing, and/or the fulfillment of certain contractual obligations, ASIMETRIX may assume the role of Data Processor (as defined in Section 4.9) with respect to other databases. In the latter case, full compliance with the commitments outlined in Section 14 shall be observed.



Additionally, ASIMETRIX reserves the right to delegate certain processing activities to a third party to be carried out on its behalf. In such cases, the third party shall comply with the commitments set forth in Section 14 of this policy.

8. PROCESSING ACTIVITIES

ASIMETRIX's databases refer to the set of personal data systematically stored for the purposes described in Section 9 of this policy. The processing activities carried out on these databases include the collection of personal data, its storage, transmission to processors, use for the regular execution of activities related to ASIMETRIX's corporate purpose, fulfillment of legal and contractual obligations, consultation, and verification of information. ASIMETRIX does not transfer its databases to third parties, as defined in Section 4.14. However, should such transfer be required, ASIMETRIX will ensure it obtains the data subject's prior, express, and informed authorization for carrying out the corresponding processing activity.

In addition to the above, in some cases, ASIMETRIX may consult, request, provide, report, process, and disclose information related to the credit, financial, commercial, and service behavior of data subjects to public or private entities, in Colombia or abroad, that manage or administer databases related to the creation, development, modification, termination, and fulfillment of financial, commercial, credit, and service obligations. To carry out such activities, ASIMETRIX will ensure it has obtained the data subject's prior, express, and informed authorization.

The aforementioned processing activities may be carried out through emails, physical documents, text messages, data messages, telephone calls (mobile or landline), inclusion of information in electronic or digital devices, or physical media, among others.

9. PURPOSES OF PROCESSING

To fulfill its corporate purpose and comply with various internal and external legal and contractual obligations, ASIMETRIX requires certain databases whose purposes vary depending on the specific characteristics and nature of each database subject to processing, as described below:

PURPOSES COMMON TO ALL DATABASES

Except as otherwise specifically provided for each particular database, the following purposes pursued by ASIMETRIX in the processing of personal information are common to all its databases:



- 9.1. Establishing communication channels with the data subjects and sending newsletters and commercial or institutional information from ASIMETRIX or from companies or individuals represented by ASIMETRIX.
- 9.2. Fulfilling legal and/or contractual obligations related to the execution of activities inherent to ASIMETRIX's corporate purpose.
- 9.3. Carrying out marketing, advertising, and loyalty programs related to the corporate purpose of ASIMETRIX or of the companies or individuals represented by ASIMETRIX.
- 9.4. Organizing and executing cultural and institutional events and programs.
- 9.5. Addressing and processing requests, complaints, and claims.
- 9.6. Storing information in active and/or inactive archives when there is a legal obligation to retain such information after the execution of activities or relationships that gave rise to the processing, in accordance with the specific legislation regulating such matters.

SPECIFIC PURPOSES FOR CERTAIN DATABASES

9.7. EMPLOYEE DATABASES

The processing activities related to Employee Databases (including potential, current, and former employees), in addition to the purposes common to all databases described above –except as provided in the paragraph of Section 9.8 of this document– shall have the following purposes:

- 9.7.1. Execution of processes related to recruitment, promotion, employee welfare, payroll, performance and competencies, onboarding, training, education, occupational health and safety, and work environment.
- 9.7.2. Administration of knowledge, psychological, and/or technical tests for the data subjects.
- 9.7.3. Implementation of training and development programs.
- 9.7.4. Issuance and validation of employment and/or commercial references.
- 9.7.5. Provision of personal information for the execution of ASIMETRIX's contractual relationships with third parties.
- 9.7.6. Adoption of control and security measures over ASIMETRIX's facilities, property, or assets.
- 9.7.7. Use of personal images and/or video footage containing personal images captured by monitoring and/or video surveillance systems installed by ASIMETRIX throughout its infrastructure, as evidence in judicial, extrajudicial, or administrative proceedings conducted by or involving ASIMETRIX in any capacity.



9.7.8. Publication of images (personal image) on ASIMETRIX's website, as well as on the various social media platforms owned by ASIMETRIX.

9.7.9. Verification and consultation of information related to data subjects in public or private databases and lists, both national and international, directly or indirectly related to: (i) judicial, criminal, tax, disciplinary, or fiscal liability records; (ii) disqualifications or incompatibilities; (iii) money laundering; (iv) terrorism financing; (v) corruption; (vi) transnational bribery; (vii) individuals wanted by the justice system; and any other databases reporting links between individuals and illicit activities of any kind.

9.8. SUPPLIER DATABASES

The processing activities related to Supplier Databases (including potential, current, and former suppliers, as well as their employees and contact persons), in addition to the purposes common to all databases described above –except as provided in the paragraph of Section 9.9 of this document– shall have the following purposes:

9.8.1. Facilitating the contracting processes for services and/or supply of products.

9.8.2. Verifying the fulfillment of contractual obligations in their favor by contractors.

9.8.3. Evaluating the quality of services and products provided by suppliers.

9.8.4. Serving as a basis for the analysis involved in establishing and/or maintaining contractual relationships.

9.8.5. Serving as a basis for risk assessment related to current contractual relationships.

9.8.6. Serving as a basis for conducting market studies or commercial or statistical research.

9.8.7. Serving as a basis for verifying the origin of funds and activities related to money laundering and/or terrorism financing.

9.8.8. Validation and issuance of commercial references and other information provided.

9.8.9. Verification and consultation of information related to data subjects in public or private databases and lists, both national and international, directly or indirectly related to: (i) judicial, criminal, tax, disciplinary, or fiscal liability records; (ii) disqualifications or incompatibilities; (iii) money laundering; (iv) terrorism financing; (v) corruption; (vi) transnational bribery; (vii) individuals wanted by the justice system; and any other databases reporting links between individuals and illicit activities of any kind.



99.8.10. Verification, consultation, and reporting of information related to the credit, financial, commercial, and service behavior of data subjects to public or private entities that manage or administer databases related to the creation, development, modification, termination, and fulfillment of financial, commercial, credit, and service obligations.

9.9. SHAREHOLDER DATABASE

The processing activities related to SHAREHOLDER DATABASES, in addition to the purposes common to all DATABASES described above, shall have the following purposes:

9.9.1. Fulfillment of legal obligations and obligations derived from the corporate bylaws with respect to the shareholder, as the data subject.

9.9.2. Provision of information regarding the payment of dividends or profits.

9.9.3. Adoption of control and security measures across ASIMETRIX's various facilities.

9.10. CLIENT DATABASES

The processing activities related to CLIENT DATABASES (including current and former clients, as well as their contact persons), in addition to the purposes common to all databases described above, shall have the following purposes:

9.10.1. Monitoring the fulfillment of obligations by clients.

9.10.2. Serving as a basis for the analysis involved in establishing and/or maintaining contractual relationships.

9.10.3. Serving as a basis for the evaluation of risks arising from ongoing contractual relationships.

9.10.4. Serving as a basis for conducting market studies or commercial or statistical research.

9.10.5. Evaluation of the quality and satisfaction level of the services provided by ASIMETRIX, as well as the development of improvement strategies for service delivery.

9.10.6. Transmission of the data subjects' personal data to natural or legal persons who are ASIMETRIX's strategic partners or with whom ASIMETRIX has entered into or may enter into collaboration or partnership agreements.

9.10.7. Transfer of the data subjects' personal data to natural or legal persons who are ASIMETRIX's strategic partners or with whom ASIMETRIX has entered into or may enter into collaboration or partnership agreements.



9.10.8. Adoption of control and security measures across ASIMETRIX's various facilities.

9.10.9. Validation of commercial references and other information provided.

9.10.10. Verification and consultation of information related to data subjects in public or private databases and lists, both national and international, directly or indirectly related to: (i) judicial, criminal, tax, disciplinary, or fiscal liability records; (ii) disqualifications or incompatibilities; (iii) money laundering; (iv) terrorism financing; (v) corruption; (vi) transnational bribery; (vii) individuals wanted by the justice system; and any other databases reporting links between individuals and illicit activities of any kind.

9.10.11. Verification, consultation, and reporting of information related to the credit, financial, commercial, and service behavior of data subjects to public or private entities that manage or administer databases related to the creation, development, modification, termination, and fulfillment of financial, commercial, credit, and service obligations.

9.11. POTENTIAL CLIENT DATABASES

The processing activities related to the POTENTIAL CLIENT DATABASES (including their contact persons), in addition to the purposes common to all DATABASES described above, shall have the following purposes:

9.11.1. Verification and consultation of information related to data subjects in public or private databases and lists, both national and international, directly or indirectly related to: (i) judicial, criminal, tax, disciplinary, or fiscal liability records; (ii) disqualifications or incompatibilities; (iii) money laundering; (iv) terrorism financing; (v) corruption; (vi) transnational bribery; (vii) individuals wanted by the justice system; and any other databases reporting links between individuals and illicit activities of any kind.

9.11.2. Transmission of personal data of the DATA SUBJECTS to natural or legal persons who are ASIMETRIX's strategic partners or with whom ASIMETRIX has entered into or may enter into collaboration or partnership agreements.

9.11.3. Transfer of personal data of the DATA SUBJECTS to natural or legal persons who are ASIMETRIX's strategic partners or with whom ASIMETRIX has entered into or may enter into collaboration or partnership agreements.

9.11.4. Adoption of control and security measures across ASIMETRIX's various facilities.

10. PROCESSING OF SENSITIVE PERSONAL DATA

ASIMETRIX acknowledges that certain data subject to processing may qualify as sensitive data. Accordingly, it has adopted measures to ensure that when the data processed falls under the legal definition of sensitive data:

10.13. Compliance with the principles governing the processing of personal information, as established in Section 5, shall be reinforced.

10.14. No activity shall be conditioned on the provision of sensitive personal data.

10.15. The express, informed, and voluntary authorization of the data subjects shall be obtained prior to the execution of any processing activities.

11. PROCESSING OF MINORS' DATA

As a general rule, in the execution of any personal data processing activity, ASIMETRIX shall refrain from handling data whose subject is a minor, in accordance with the provisions of Article 7 of Law 1581 of 2012.

Exceptionally, ASIMETRIX may be required to process the personal data of minors. In such cases, the processing of this type of data shall be subject to the following rules:

10.16. Respect for the best interests of the minor as the data subject.

10.17. Respect for the fundamental rights of the minor as the data subject.

10.18. Authorization issued by the legal representative of the minor, where required.

10.19. Respect for the minor's right to be heard, taking into account their maturity, autonomy, and capacity to understand the matter, as well as the nature of the data being processed and the purpose of such processing activities.

COMMITMENTS TO DATA SUBJECTS

11. COMMITMENTS

In compliance with the provisions of Section 7 of this policy, as well as Articles 17 and 18 of Law 1581 of 2012, and in its capacity as the Data Controller, ASIMETRIX assumes the following commitments toward the data subjects of the personal information:

- 11.1. Guarantee the data subject the full and effective exercise of their right to habeas data at all times.
- 11.2. Request authorization from the data subject in cases where such authorization is required by law.
- 11.3. Retain a copy of the authorization issued by the data subject when it is required.
- 11.4. Properly inform the data subject of the purpose of data collection.
- 11.5. Properly inform the data subject of their rights as such.
- 11.6. Safeguard the information under appropriate security conditions to prevent its alteration, loss, consultation, use, or unauthorized or fraudulent access.
- 11.7. Ensure that the information subject to processing is truthful, complete, accurate, up-to-date, verifiable, and understandable.
- 11.8. Rectify the information when it is incorrect or biased.
- 11.9. Address inquiries and complaints made by the data subjects within the timeframes established by law.
- 11.10. Allow access to personal information only to those individuals who, according to legal provisions, are authorized to access it.
- 11.11. Adopt an internal manual of procedures to ensure the proper processing of personal data.
- 11.12. Inform the data subject, upon request, of how their data has been used.
- 11.13. Report to the Delegate Superintendent for the Protection of Personal Data, or the appropriate authority, any security breaches and any risks involved in the administration of the data subjects' information.

12. SPECIAL COMMITMENTS

When the information is the subject of a dispute before an administrative or judicial authority, or is under claim by the data subject, or its blocking has been ordered by the competent authority, ASIMETRIX commits to taking all necessary measures to prevent such information from continuing to be processed, except for its storage, until a final decision is reached.

13. COMMITMENTS OF ASIMETRIX OR THIRD PARTIES ACTING AS DATA PROCESSORS

The obligations described below shall apply (i) when, for convenience, ASIMETRIX delegates the performance of certain data processing-related activities to a third party; or (ii) when ASIMETRIX carries out processing activities in its capacity as data processor, as defined in Section 4 of this document:

- 13.1. Guarantee the data subject the full and effective exercise of their right to habeas data.
- 13.2. Safeguard the information under appropriate security conditions to prevent its alteration, loss, consultation, use, or unauthorized or fraudulent access.
- 13.3. Timely update, rectify, or delete data when requested by ASIMETRIX or directly by the data subject.
- 13.4. Address requests made by data subjects aimed at ensuring the proper processing of their personal data.
- 13.5. When the information is the subject of a dispute before an administrative or judicial authority, is under claim by the data subject, or its blocking has been ordered by a competent authority, take all appropriate measures to prevent such information from continuing to be processed, except for its storage, until a final decision is reached.
- 13.6. Allow access to the information only to individuals who are authorized to access it.
- 13.7. Report to the Delegate Superintendent for the Protection of Personal Data, or the appropriate authority, any breaches of security codes and any risks involved in the management of data subjects' information.
- 13.8. Adopt data processing policies that ensure the proper handling of personal data.
- 13.9. Provide the data processing policies mentioned above to the data controller.

ON THE RIGHTS OF DATA SUBJECTS

14. RIGHTS OF DATA SUBJECTS

ASIMETRIX, committed to respecting the interests of data subjects whose personal data is processed, and aware of the importance of proper data handling, recognizes the following rights of the data subjects in its databases:

14.1. Right to Access

Under this right, the data subject is entitled to request, at any time and free of charge, information about the data being processed by ASIMETRIX and the use being made of such data.

14.2. Right to Rectification

The data subject is entitled to request, at any time, the correction of inaccurate information held in ASIMETRIX's databases.



4.3. Right to Update

The data subject has the right to request that the information held in ASIMETRIX's databases be complete and up-to-date, for reasons other than the correction of data. In this regard, they may request the inclusion or deletion of any type of information they deem relevant.

14.4. Right to Request a Copy of the Authorization

When, in accordance with Section 6 of this policy and Article 10 of Law 1581 of 2012, the data subject's authorization is required for their data to be subject to processing activities, they shall have the right to request, at any time and free of charge, a copy of the authorization issued by them.

14.5. Right to Revoke the Authorization

When, in accordance with Section 6 and Article 10 of Law 1581 of 2012, the data subject's authorization is required for their data to be processed, they shall have the right to revoke such authorization at any time.

14.6. Right to Erasure

Under this right, the data subject may request ASIMETRIX, at any time, to delete the data held in its databases, provided there is no legal or contractual obligation to retain such data.

PROCEDURES FOR THE EFFECTIVE EXERCISE OF RIGHTS

15. GENERAL ASPECTS

ASIMETRIX has adopted a series of procedures to ensure the proper processing of personal data and the exercise of the rights of data subjects recognized in Section 15. These procedures may vary depending on the specific right exercised by the data subject, as detailed in Sections 17 and 18 of this policy.



16. INQUIRIES

To exercise the rights of knowledge, access to information, and request for a copy of the authorization, as established in Section 15, items 15.1 and 15.4, respectively, the data subjects or persons authorized to act on their behalf, in accordance with Section 19, may submit inquiries to ASIMETRIX's Privacy Officer, as detailed in Section 20, in accordance with the following rules:

16.1. Mechanisms

Inquiries must be submitted to the ASIMETRIX Privacy Officer via the following email address: **comunicaciones.asimetrix@asimetrix.co**

Such inquiries must be submitted by the persons authorized under Section 19, including a brief description of the information they wish to access, mailing address, identification details, and documents proving their legal standing to act, in cases where the request is not made by the data subject directly.

16.2. Procedure

Upon receiving the inquiry, ASIMETRIX's Privacy Officer will address it, where possible, within ten (10) business days from the date of receipt.

If it is not possible to respond within the aforementioned period, the requester will be informed of the delay, the reasons for it, and the date on which the request will be resolved, which shall not exceed five (5) business days following the expiration of the initial term.

16.3. Response

ASIMETRIX's Privacy Officer, in charge of handling matters related to the proper processing of personal data, will respond to the data subject's request within the timeframes stated in the previous section, in writing, to the physical or electronic address provided by the requester for such purpose.

If the requester provides both a physical and an electronic address, or more than one of either, ASIMETRIX shall have full discretion to choose which address to use for sending the response to the inquiry.

17. CLAIMS

To exercise the rights of rectification, updating, revocation of authorization, and deletion of information, as set forth in Sections 15.2, 15.3, 15.5, and 15.6, respectively, the data subjects or authorized individuals, in accordance with Section 19, may submit claims to ASIMETRIX's Privacy Officer, as described in Section 20, in accordance with the following rules:



117.1. Mechanisms

Claims must be submitted to the ASIMETRIX Privacy Officer via the following email address: comunicaciones.asimetrix@asimetrix.co

Claims must be submitted by persons authorized under Section 19, briefly describing the facts that support the request, including a mailing address, identification details, and documents supporting the claim and proving legal standing to act, in cases where the requester is not the data subject.

17.2. Procedure

Incomplete Claims

If ASIMETRIX determines that the claim submitted by the data subject or their authorized representative, in accordance with Section 19, is incomplete due to missing the requirements set forth in the previous section, it will request the missing information within five (5) business days from the date of receipt of the request.

If two (2) months pass from the date of ASIMETRIX's request without the requester submitting the required information, it will be understood that the claim has been withdrawn, without prejudice to the right to file a new claim on the same matter. In such a case, the response periods will begin from the date of the new claim.ç

Complete Claims

Once the claim is complete, or the missing information has been submitted within the allowed period, a note will be added to the corresponding ASIMETRIX database stating "claim in process" and the reason for the claim, within no more than two (2) business days. This note will remain until the claim is resolved.

Notwithstanding the above, ASIMETRIX's Privacy Officer shall resolve the claim, if possible, within fifteen (15) business days from the date of receipt.

If it is not possible to address the claim within the period mentioned above, the data subject will be informed of the delay, the reasons for it, and the date on which the claim will be resolved. This date shall not exceed eight (8) business days after the expiration of the initial term.

17.3. Decision

ASIMETRIX's Privacy Officer will respond to the data subject's request in writing, within the timeframes established in the previous section, using the physical or electronic address provided by the requester for that purpose.



If the requester provides both a physical and an electronic address, or more than one of either, ASIMETRIX shall have full discretion to decide which address to use for delivering the response to the inquiry.

18. LEGITIMACY

The following individuals are authorized to exercise the rights established in Section 15 and those recognized by law: the data subject, their successors, and individuals authorized by either of them. In the latter two cases, proper documentation proving the legal standing of the person making the request must be provided through appropriate mechanisms.

19. COMPETENCE

For all matters related to the processing of personal information, including the handling of inquiries and requests, ASIMETRIX has designated a Privacy Officer as the responsible authority. For this purpose, technical, human, and administrative measures have been implemented to ensure the confidentiality and security of the information.

FINAL PROVISIONS

20. EFFECTIVE DATE

This policy is effective as of its publication date, October 12, 2024, and shall remain in force for as long as ASIMETRIX carries out the activities described in Section 9, and as long as those activities align with the purposes of processing that inspired this policy.

Any substantial changes to the Processing Policies that may affect the content of the data subject's authorization—particularly those related to ASIMETRIX's identity and/or the purpose of processing—will be communicated to the data subjects in a timely and efficient manner before the new policies are implemented.

21. NATIONAL DATA PROTECTION AUTHORITY

ASIMETRIX, in its commitment to ensuring the effective protection of the personal data of the data subjects whose information is part of its databases, makes available to the general public the contact details of the Delegation for the Protection of Personal Data, the competent national authority overseeing data processing activities in Colombia. This information can be accessed at the following link: <http://www.sic.gov.co/sobre-la-proteccion-de-datos-personales>