

## **GENERALITIES**

This document establishes the Personal Data Treatment Policy of **DELIFLOR LATIN AMERICA**, which guarantees the protection of the rights to privacy, intimacy, good name and image of all our clients, suppliers, employees, former employees, contractors and others. holders of the personal data that rest in our databases.

## **RESPONSIBLE FOR THE PROCESSING OF PERSONAL DATA**

**DELIFLOR LATIN AMERICA**, identified with NIT 900.223.044-6, with main domicile in the city of Rionegro, in the Vereda Cyprus Sector Llanogrande, complies with the provisions of Law 1581 of 2012 and Decree 1377 of 2013.

## **DEFINITIONS**

- Authorization: Prior, express and informed consent of the owner of the information to carry out the processing of your personal data.
- Privacy Notice: Verbal or written communication generated by the Responsible Party addressed to the Owner for the processing of their personal data, by means of which they are informed about the existence of the Information Processing policies that will be applicable to them, how to access to the same and the purposes of the Treatment that is intended to give the personal data.
- Database: Organized set of personal data that is subject to Treatment.
- Personal data: Any information linked to or that may be associated with one or more specific or determinable natural persons. e) Private data: It is the data that due to its intimate or reserved nature is only relevant for the owner.
- Sensitive data: Sensitive data is understood to be those that affect the privacy of the Holder or whose improper use may generate discrimination, such as those that reveal racial or ethnic origin, political orientation, religious or philosophical convictions, union membership , social, human rights organizations or that promote the interests of any political party or that guarantee the rights and guarantees of opposition political parties, as well as data related to health, sexual life and biometric data.
- Responsible for the Treatment: Natural or legal person, public or private, that by itself or in association with others, carries out the Treatment of personal data on behalf of the Responsible for Treatment.
- Responsible for the Treatment: Natural or legal person, public or private, that by itself or in association with others, decides on the database and / or the Treatment of the data.
- Owner: 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 or deletion of the same.

## **GENERAL PRINCIPLES FOR THE PROCESSING OF PERSONAL DATA**

The principles that are established below constitute the general parameters that will be respected by **DELIFLOR LATIN AMERICA**, in the processes of collection, use and processing of personal data.

- Principle of Legality: The processing of personal data will comply with the provisions of the Constitution, the law and these regulations.
- Principle of purpose. The treatment of personal data collected by **DELIFLOR LATIN AMERICA** must obey a legitimate purpose of which the holders of said information must be informed.
- Principle of freedom. The treatment can only be carried out with the prior, express and informed consent of the owner. Personal data may not be obtained or disclosed without prior authorization or in the absence of a legal or judicial mandate, which relieves consent.
- Principle of truthfulness or quality: The information subject to treatment must be truthful, complete, accurate, up-to-date and understandable. The processing of partial, incomplete, fractioned or misleading data is prohibited.
- Principle of transparency. In the treatment, the right of the owner to obtain from **DELIFLOR LATIN AMERICA** at any time and without restrictions, information about the data that concerns him must be guaranteed.
- Principle of access and restricted circulation: Personal data, except public information, may not be available on the internet, or other means of communication or mass dissemination, unless access is technically controllable to provide restricted knowledge only to the holders or authorized third parties.
- Principle of security. The information subject to treatment by **DELIFLOR LATIN AMERICA**, must be protected through the use of technical, human and administrative measures, which are necessary to provide security to the records, avoiding their adulteration, loss, consultation or unauthorized or fraudulent use .
- Principle of confidentiality. All persons involved in the processing of personal data are obliged to guarantee the reservation of the information, even after having terminated their relationship with any of the activities that such processing comprises.

## **OVERALL OBJECTIVE**

Define procedures for the collection, handling and treatment of personal data carried out by **DELIFLOR LATIN AMERICA**, in order to guarantee and protect the fundamental right of habeas data of its business associates within the framework of what is established in the law and generate a scheme organized to safeguard the private, semi-private, public and sensitive data of its holders.

## **AREA OF APPLICATION**

This manual will be applicable to personal and commercial data registered in the different databases managed by **DELIFLOR LATIN AMERICA**, for labor, financial and commercial purposes, among other activities related to the corporate purpose of the organization.

The information that **DELIFLOR LATIN AMERICA** collects may include, in whole or in part, depending on the needs for which the information is collected, among others the following data:

- Names and surnames.
- Type and identification number.
- Nationality and country of residence.
- Date of birth and gender.
- Marital status and / or kinship in relation to underage or disabled persons requesting our services.
- Contact landlines and cell phones. (personal and / or work).
- Postal and electronic addresses (personal and / or work).
- Profession or occupation.
- Company in which you work, work and position.
- Labor, commercial and personal references.
- Affiliations to EPS, ARL, Pensions, AFP, Life Insurance.

This data may be stored and / or processed on servers located at the **DELIFLOR LATIN AMERICA** headquarters, which is authorized by our business associates by accepting this Privacy Policy.

The simple voluntary contribution made by the business associate of their personal or commercial data constitutes acceptance of these terms and conditions and consequently tacitly authorizes us to process their personal data.

In some formats, the business associate is required to voluntarily provide personal or commercial data, including their name or company name, address, email, telephone number, contact information, education, work or business history, NIT or Cedula and other data from which their identity can be deduced. **DELIFLOR LATIN AMERICA**, can carry out judicial studies, make home visits, and occupational medical examinations and all this information voluntarily provided by the business associate.

## **TRUTH OF THE INFORMATION**

Our business associates must provide truthful information about their personal or commercial data in order to make possible the provision of services by **DELIFLOR LATIN AMERICA**, and under whose condition they agree to deliver the required information.

**DELIFLOR LATIN AMERICA**, presumes the veracity of the information provided and therefore, does not assume responsibility for damages and / or damages of any nature that could have origin in the lack of veracity, validity, sufficiency or authenticity of the information, including damages. that may be due to homonymy or identity theft.

## **DATABASE**

The policies and procedures contained in this manual apply to the databases managed by **DELIFLOR LATIN AMERICA**, and which will be registered in accordance with the law.

Sensitive Data: The treatment of sensitive data will be carried out in accordance with the law and the owner will be explicitly and previously informed of the sensitive data subject to treatment to obtain their consent.

## **APPLICABLE LEGISLATION**

This manual was prepared taking into account the provisions contained in articles 15 and 20 of the Political Constitution, the provisions of Law 1581 of 2012 "By which general provisions for the protection of personal data", Decree number 1377 of 2013 "By which Law 1581 of 2012 is partially regulated" and that ordered in Decree 886 of 2014.

## **INFORMATION ON CHILDREN AND MINOR ADOLESCENTS**

DELIFLOR LATIN AMERICA, will ensure the proper use of the personal data of underage boys, girls and adolescents, guaranteeing that in the processing of their data the best interest of them is respected, and their fundamental rights and, as far as possible, having your opinion, as holders of your personal data, take into account.

## **PURPOSES OF THE PROCESSING OF PERSONAL DATA.**

The information and personal data collected through DELIFLOR LATIN AMERICA, are used to carry out financial transactions of payments, collections or reimbursements, attend legal procedures, make reports, meet requirements of the different national or international administrative control and surveillance authorities, police authorities or judicial authorities, banking entities, insurance companies, for internal administrative and commercial purposes, including market research, audits, accounting reports, statistical analysis, billing, for the execution of labor and service provision contracts, affiliation to the System General Social Security and complementary activities, identification of fraud and prevention of money laundering and other criminal activities and other purposes indicated in this document, by reason of the company's corporate purpose.

By accepting this Privacy and Treatment Policy, our business associates in their capacity as owners of the collected data, authorize **DELIFLOR LATIN AMERICA**, to carry out the treatment thereof, partially or totally, including the collection, storage, recording, use, circulation, processing, deletion, for the execution of activities related to the services and products purchased.

## **AUTHORIZATION**

The collection, storage, use, circulation or deletion of personal data by **DELIFLOR LATIN AMERICA** requires the free, prior, express and informed consent of the owner thereof. DELIFLOR LATIN AMERICA, as the person responsible for the processing of personal data, has provided the necessary mechanisms to obtain the authorization of the holders, guaranteeing in any case that it is possible to verify the granting of said authorization.

## **RIGHTS OF THE INFORMATION HOLDERS.**

In accordance with the provisions of article 8 of Law 1581 of 2012, the owner of personal data has the following rights:

- Know, update and rectify your personal data against **DELIFLOR LATIN AMERICA**, in its capacity as data controller.
- Request proof of the authorization granted to **DELIFLOR LATIN AMERICA**, in its capacity as Data Controller.
- Be informed by **DELIFLOR LATIN AMERICA**, upon request, regarding the use that has been given to your personal data.
- Present before the Superintendency of Industry and Commerce complaints for infractions of the provisions of Law 1581 of 2012, once the consultation or claim process has been exhausted before the Data Controller.
- Revoke the authorization and / or request the deletion of the data when in the Treatment the principles, rights and constitutional and legal guarantees are not respected.
- Free access to your personal data that have been processed.

## **DUTIES OF THE COMPANY IN RELATION TO THE PROCESSING OF PERSONAL DATA**

DELIFLOR LATIN AMERICA, will keep in mind, at all times, that personal data are the property of the people to whom they refer and that only they can decide on them. In this sense, it will use them only for those purposes for which it is duly empowered, and in all cases respecting Law 1581 of 2012 on the protection of personal data.

In accordance with the provisions of article 17 of Law 1581 of 2012, **DELIFLOR LATIN AMERICA**, undertakes to permanently comply with the following duties:

- Guarantee the Holder, at all times, the full and effective exercise of the right to habeas data.
- Keep the information under the necessary security conditions to prevent its adulteration, loss, consultation, use or unauthorized or fraudulent access.
- Carry out in a timely manner, the update, rectification or deletion of the data.
- Process inquiries and claims made by the Holders.

- Refrain from circulating information that is being controversial by the Holder and whose blocking has been ordered by the Superintendency of Industry and Commerce.
- Allow access to information only to people who can have access to it.
- Inform the Superintendency of Industry and Commerce when there are violations of the security codes and there are risks in the administration of the information of the Holders.
- Comply with the instructions and requirements issued by the Superintendency of Industry and Commerce.

#### **PROCEDURES FOR ACCESS, CONSULTATION AND CLAIM**

**RIGHT OF ACCESS:** The power of disposition or decision that the owner has about the information that concerns him, necessarily entails the right to access and know if his personal information is being processed, as well as the scope, conditions and generalities of said treatment .

Likewise, the owner has the right to request rectification in case of being inaccurate or incomplete and to cancel them when they are not being used in accordance with the purposes and legal, contractual terms or according to the purposes and terms contemplated in this Privacy Policy.

Our business associates can exercise their rights to know, update, rectify and delete their personal data by sending their request to the email: [mr@deliflor.com](mailto:mr@deliflor.com), in accordance with this Privacy Policy.

You must include the following information in the request:

- a) Names and surnames.
- b) Type of document.
- c) Document number.
- d) Telephone.
- e) Email.
- f) Country.
- g) Subject.

#### **ANSWER TO INQUIRIES**

In any case, regardless of the mechanism implemented to attend to consultation requests, they will be attended to within a maximum term of ten (10) business days from the date of receipt. When it is not possible to answer the query within said term, the interested party will be informed before the expiration of 10 business days, stating the reasons for the delay and indicating the date on which the query will be attended, which in no case may exceed the five (5) business days following the expiration of the first term.

## **CLAIMS**

In accordance with the provisions of article 14 of Law 1581 of 2012, the Holder who considers that the information contained in a database must be subject to correction, updating 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 with the Data Controller, which will be processed under the following rules:

1. The claim may be submitted by the Holder at the email [mr@deliflor.com](mailto:mr@deliflor.com), if the claim received does not have complete information that allows it to be processed, a period of 5 days must be given to send the information that is required .
2. Once the complete claim is received, the corresponding management will be carried out for the solution of the claim by the owner of the information.
3. The maximum term to attend the claim will be fifteen (15) business days from the day following the date of receipt.

## **RECTIFICATION AND UPDATING OF DATA.**

**DELIFLOR LATIN AMERICA** has the obligation to rectify and update, the request of the owner, the information of the latter, which turns out to be incomplete or inaccurate, in accordance with the procedure and the terms indicated above. In this regard, the following will be taken into account: In requests for rectification and updating of personal data, the owner must indicate the corrections to be made and provide the documentation that supports their request.

**DELIFLOR LATIN AMERICA** has full freedom to enable mechanisms that facilitate the exercise of this right, as long as they benefit the owner. Consequently, electronic or other means that it deems pertinent may be enabled.

**DELIFLOR LATIN AMERICA** may establish forms, systems and other simplified methods, which must be informed in the privacy notice and which will be made available to interested parties on the website.

## **DATA SUPPRESSION**

The owner has the right, at all times, to request **DELIFLOR LATIN AMERICA** the deletion (elimination) of their personal data when:

- Consider that they are not being treated in accordance with the principles, duties and obligations set forth in Law 1581 of 2012.
- They are no longer necessary or relevant for the purpose for which they were obtained.
- The period necessary for the fulfillment of the purposes for which they were obtained has been exceeded.

## **REVOCACTION OF AUTHORIZATION**

The owners of the personal data can revoke the consent to the processing of their personal data at any time, as long as a legal provision does not prevent it. To do this, they should contact **DELIFLOR LATIN AMERICA** by email: [mr@deliflor.com](mailto:mr@deliflor.com) or by phone (4) 448 49 91

## **SECURITY MEASURES**

In development of the security principle established in Law 1581 of 2012, **DELIFLOR LATIN AMERICA**, has adopted the technical, human and administrative measures that are necessary to grant security to the records avoiding their adulteration, loss, consultation, use or unauthorized access or fraudulent.

However, the above, the owner of the information assumes the risks derived from delivering this information in a medium such as the internet, which is subject to various variables - third-party attacks, technical or technological failures, among others. **DELIFLOR LATIN AMERICA** will make its best technological effort to guarantee the security of the personal information of all its clients and / or users, using reasonable and current security methods to prevent unauthorized access, to maintain the accuracy of the data and guarantee the correct use of information.

## **IMPLEMENTATION OF SECURITY MEASURES**

**DELIFLOR LATIN AMERICA** will maintain mandatory security protocols for personnel with access to personal data and information systems.

The procedure must consider, as a minimum, the following aspects:

- Duties and obligations of the staff.
- Structure of personal databases and description of the information systems that process them.
- Procedure for notification, management and response to incidents.
- Procedures for making backup copies and data recovery.
- Periodic controls that must be carried out to verify compliance with the provisions of the security procedure that is implemented.
- The procedure must be kept up to date at all times and must be reviewed whenever relevant changes occur in the information system or in its organization.
- The content of the procedure must be adapted at all times to the current provisions on personal data security.

## **MODIFICATIONS TO THE PRIVACY POLICY**

**DELIFLOR LATIN AMERICA** reserves the right to make changes or updates to this Privacy Policy at any time, in order to attend to new legislation, internal policies or new requirements for the provision or offering of its services or products.



## **DATA TRANSFER TO THIRD COUNTRIES**

The transfer of personal data of any kind to countries that do not provide adequate levels of data protection is prohibited. It is understood that a country offers an adequate level of data protection when it complies with the standards set by the Superintendency of Industry and Commerce on the matter, which in no case may be lower than those that this law requires of its recipients.