

ECONOMETRÍA S.A

INFORMATION PROCESSING POLICY

ECONOMETRIA is interested in protecting the privacy of the personal information of its partners, customers, employees, contractors and respondents obtained through our corporate and commercial management; surveys and interviews; portals, information systems and other services, committing to adopt a policy of confidentiality and security as provided in this document.

Our Privacy Policy and treatment of information details how ECONOMETRIA handles and manages the personal information it has incorporated into its databases.

The User acknowledges that the delivery of personal information is done voluntarily and when it happens via web, it is done taking into account the characteristics of our Portals, Information Systems and other services, as well as the powers of use by ECONOMETRIA and with the understanding that such information will be part of a file and / or database containing your profile, which may be used by ECONOMETRIA in the terms set forth herein.

1 OBJECTIVE

The purpose of this document is to formalize the policies for the treatment of personal data of all our partners, clients, suppliers, collaborators and respondents, guaranteeing their right to know, update and rectify the information contained in ECONOMETRIA's databases or files.

2 SCOPE

This information treatment policy applies to all employees at all levels of ECONOMETRIA and to the employees of our strategic allies at national and international level. It applies to all databases and personal information files held by ECONOMETRIA and that are framed within the provisions of Law 1581 of 2012.

3 DEFINITIONS

For purposes of the application and interpretation of this policy, the definitions established in Law 1581 of 2012 and Decree 1377 of 2013 must be considered.

4 PROCESSING OF PERSONAL INFORMATION

4.1 Stored Personal information

The personal information that we collect in our database and that is used and processed in our different projects corresponds, mainly, to basic identification data such as: name, last name, e-mail, mailing address, telephone, cell phone, economic area in which you work (public or private sector, academia, guilds, media, student, public sector area or agency, financial institutions, etc.), name of the institution where you work and position; as well as, basic socio-demographic characterization data.

In some cases, data may be collected that reflect personal perceptions and opinions on general or particular aspects of public policies, programs or projects. We also occasionally conduct surveys, interviews or opinion polls with the public or specific sectors in order to establish their opinion on the service or intervention received.

In these cases the personal data requested may or may not be provided and in any case are never used by ECONOMETRIA to obtain results different from the legal and/or contractual obligations in our charge and the purposes indicated in the respective request. This data may be stored and/or processed in servers located in computer centers, either our own or contracted with third party providers (data processors).

The information provided will remain stored for the maximum term necessary to allow us to fulfill our legal and/or contractual obligations.

We presume the veracity of the information provided and do not verify, nor do we assume the obligation to verify the veracity, validity, sufficiency and authenticity of the data provided to us. Therefore, we do not assume liability for damages and/or losses of any nature that may be caused by the lack of veracity, validity, sufficiency or authenticity of the information, including damages that may be due to homonymy or impersonation.

By registering and/or browsing our web pages, our partners and affiliates and/or visitors to the site expressly state that they are aware of and accept these policies and consent to the processing of their information.

4.2 Purpose of information processing

The person who provides us with Personal Data authorizes us to use this information for the purposes indicated in the respective request, in accordance with the provisions of this Processing Policy, and we will not proceed to transfer or disclose it outside our databases unless:

- We are expressly authorized to do so.
- It is necessary to enable our contractors, suppliers or agents to perform the services we have engaged them to perform.
- It is given to third parties for the purpose of providing certain services on our behalf or to other entities with which we have agreements.
- We implement a contract for the transmission of personal data under the terms of Decree 1377 of 2013, or,
- It is required or permitted by law or for the purposes set forth in this privacy policy.
- By accepting this policy, individuals authorize us to process the information collected for the following purposes:
 - Distribute information and documents of ECONOMETRIA and its different programs and projects through different media such as e-mails, billboards, physical mail, etc.).
 - Convene events organized by ECONOMETRIA (through emails, physical invitations, phone calls, social networks, online communication, etc.).
 - Convene events held by other partner institutions, so that we can help them in their dissemination work for specific activities, without giving them our databases in any of the cases.
 - Dissemination of internal newsletters through e-mails, with the purpose of communicating internally the work, activities, recommendations, among other things, that are to be shared in each of the areas of ECONOMETRIA or among its associates.
 - Surveys and interviews by the different areas of ECONOMETRIA made through SurveyMonkey.
- By accepting this Privacy Policy, our partners, employees and suppliers authorize us to send you by various means and channels (including email, SMS or text messages, etc.) information that we believe may be of interest to you. In addition, our customers, in their capacity as owners of the data collected, by accepting this privacy policy, authorize us to:
 - Consult and update personal data, at any time, in order to keep such information up to date.
 - To contract with third parties for the storage and/or processing of information and personal data for the correct execution of the contracts entered into with us, under the security and confidentiality standards to which we are bound.

When accessing our website we may make use of cookies, web banking and other similar technologies, in its web pages and in the electronic devices used to access them, in order to know the origin, activities and preferences of our customers and users when browsing the

web, increase the functionality and accessibility of the websites, verify that users meet the criteria required to process their requests and to adapt its products and services to the needs of users. However, the current version of the ECONOMETRIA website does not contain cookies.

4.3 Security and confidentiality

We have established information security policies, procedures and standards, whose objective is to protect and preserve the integrity, confidentiality and availability of the information, regardless of the medium or format where it is located, its temporary or permanent location or the way in which it is transmitted. In this sense, we rely on the use of protocols, restricting access to information to authorized personnel only, information backup, secure software development practices, among others.

Third parties contracted by us are also obliged to adhere to and comply with the information security policies and manuals, as well as the security protocols we apply to all our processes.

All contracts with third parties (contractors, employees, external consultants, temporary collaborators, etc.) that involve the processing of personal information and data include a confidentiality agreement that details their commitments for the protection, care, security and preservation of the confidentiality, integrity and privacy thereof.

5 RIGHTS OF THE SUBJECT

The information provider retains ownership of its information and as such is the holder of the rights conferred by law and which are set forth below:

- To know, update and rectify your personal data before the person in charge of the treatment of your personal data.
- Request proof of the authorization granted to the data controller except when expressly exempted as a requirement for the processing.
- Be informed by the controller or processor, upon request, regarding the use it has made of personal data.
- To file complaints before the Superintendence of Industry and Commerce for infringements to the personal data protection regime.
- Revoke the authorization and/or request the deletion of personal data under the terms of Law 1581 of 2012. Access once a month, free of charge, to your personal data that have been subject to processing, under the terms of the regulations in force.

6 OBLIGATIONS

6.1 Obligations of ECONOMETRIA

- Guarantee to the Data Subject, at all times, the full and effective exercise of the right of habeas data.
- Request and keep, under the conditions set forth in Law 1581 of 2012, a copy of the respective authorization granted by the Subject.
- Duly inform the Data Subject about the purpose of the collection and the rights he/she has by virtue of the authorization granted.
- Keep the information under the necessary security conditions to prevent its adulteration, loss, consultation, use or unauthorized or fraudulent access.
- Ensure that the information provided to the Data Processor is truthful, complete, accurate, updated, verifiable and understandable.
- Update the information, communicating in a timely manner to the Data Processor, all developments regarding the data previously provided and take other necessary measures to ensure that the information provided to it is kept up to date.
- Rectify the information when it is incorrect and communicate the pertinent to the Data Processor.
- To provide to the Data Processor, as the case may be, only data whose Processing is previously authorized in accordance with the provisions of the law.
- To require the Data Processor at all times to respect the security and privacy conditions of the Data Subject's information.
- To process the consultations and claims formulated in the terms indicated in this document and in the law.
- Inform the Data Processor when certain information is under discussion by the Data Subject, once the claim has been filed and the respective process has not been completed.
- Inform upon request of the Data Subject about the use given to their data.
- Inform the data protection authority when there are violations to the security codes and there are risks in the administration of the information of the Data Subjects.
- Comply with the instructions and requirements issued by the Superintendence of Industry and Commerce.

6.2 Duties of designated treatment officers

- Guarantee to the Data Subject, at all times, the full and effective exercise of the right of habeas data.

- Keep the information under the necessary security conditions to prevent its adulteration, loss, consultation, use or unauthorized or fraudulent access.
- Timely update, rectification or deletion of data in accordance with the terms of the Law.
- To process the consultations and claims formulated by the Subjects under the terms set forth in the Law.
- Adopt an internal manual of policies and procedures to ensure proper compliance with this Law and, in particular, for the handling of queries and claims by the Subjects.
- Register in the database the legend "claim in process" in the manner regulated by the Law.
- Insert in the database the legend "information under judicial discussion" once notified by the competent authority about judicial processes related to the quality of the personal data.
- Refrain from circulating information that is being disputed by the Subject and whose blocking has been ordered by the Superintendence of Industry and Commerce.
- Allow access to information only to those who can access it.
- Inform the Superintendence of Industry and Commerce when there are violations to the security codes and there are risks in the administration of the information of the Subjects.
- Comply with the instructions and requirements issued by the Superintendence of Industry and Commerce.

7 RESPONSES TO REQUESTS, INQUIRIES AND COMPLAINTS

7.1 Responsible area

ECONOMETRIA will attend all requests, queries and/or claims of the subject of the information, related to the rights established in the Law to know, update, rectify and delete or revoke the authorization that had been granted to ECONOMETRIA regarding their personal data.

7.2 Channels for the exercise of rights

Subjects exercising their rights may make requests, inquiries and/or complaints through the following mechanisms:

- ❖ Email econometria@econometria.com
- ❖ Telephone communication in the city of Bogotá D.C., Colombia, at (571) 6237717.

- ❖ Send written communication to Fax (571) 623 7514.
- ❖ Directly at ECONOMETRIA offices in the city of Bogotá D.C., Colombia: Calle 94A No. 13 – 59 Piso 5.

7.3 Procedure for submitting inquiries

The subjects of the authorized persons or assignees may consult their personal information contained in our databases, in which case we will provide them with the requested information, prior verification of the legitimacy to submit such request. The inquiry will be answered within a maximum term of ten (10) business days from the date of receipt of the same. When it is not possible to attend the inquiry within said term, the reasons for the delay will be informed, indicating the date on which the consultation will be attended, which in no case may exceed five (5) working days following the expiration of the first term.

7.4 Complaints procedure

If the subjects, authorized persons or assignees consider that the information contained in a database should be corrected, updated or deleted, or when they notice the alleged breach of any of the duties contained in the Regulation, they may file a complaint with us, which will be processed under the following rules:

- The claim must be formulated by means of a request addressed to ECONOMETRIA, with the respective identification, the description of the facts that give rise to the claim, address, and the documents to be asserted. If the claim is incomplete, the subject will be required within five (5) days after receipt of the claim to correct the deficiencies. If two (2) months have elapsed from the date of the request without the required information being submitted, it will be understood that the claim has been withdrawn. In the event that ECONOMETRIA is not competent to resolve the claim, it will transfer it to the appropriate person within a maximum period of two (2) business days and will inform the interested party in a timely manner.
- If applicable, once the complete claim has been received, a caption will be included in the database stating "claim in process" and the reason for the claim, within a term no longer than two (2) business days. Such caption shall be maintained until the claim is decided.
- The maximum term to address the claim shall be fifteen (15) business days from the day following the date of its receipt. When it is not possible to respond to the claim within said term, the reasons for the delay and the date on which the claim will be

attended, which in no case may exceed eight (8) working days following the expiration of the first term, will be informed.

8 CURRENT REGULATIONS

This Information Processing Policy is governed by the provisions of Law 1581 of 2012 and Regulatory Decree 1377 of 2013 and other regulations that modify them.

9 VALIDITY

This policy is effective as of July 26, 2013.