



PRIVACY AND PERSONAL INFORMATION POLICY

OBJECTIVE

To establish the criteria for the collection, storage, use, circulation, and deletion of personal information used by COLOMBIA FREE COFFEE SAS BIC, a company identified with the TIN 901.388.066-1, with offices in the city of Bogotá, D.C. and with a branch office in the city of Neiva (the “Company”).

SCOPE

This policy applies to all the personal information recorded in the databases of the Company, which acts as the party responsible for the use of the personal information.

RESPONSIBILITIES

Compliance of this policy is strict and mandatory for the Company.

PARTY RESPONSIBLE FOR THE USE

COLOMBIA FREE COFFEE SAS, business company legally established in the Chamber of Commerce of Bogotá, identified with the TIN 901.388.066-1, with headquarters at Calle 84^a #12-18, city of Bogotá, Republic of Colombia, website www.colombiafreecoffee.com, phone + 57 (1) 490 0040, in the city of Bogotá.

USE AND PURPOSE

The use of personal information by the Company will be the following:

For the collection, storage, use, circulation to perform relevant tasks within the development of the corporate purpose of the Company regarding the compliance with the purpose of the agreement made with the owner of the information; to send invitations and to offer new products; to complete processes (requests, complaints, claims); to conduct customer satisfaction surveys about the goods and services offered by the Company; to supply contact information to the sales force and/or distribution network, and in general, to any third party with which the Company has a contractual agreement with the purpose of advancing marketing activities, market research; to contact the owner of the information via telephone to conduct surveys, research and/or confirmation of personal information needed to comply with a contractual relationship; to contact the owner of the information via electronic media – SMS or chat – to send news related to loyalty programs or to improvement of service; to contact the owner of the information via email to send account statements or invoices related to the obligations derived from the agreement reached by the parties, to comply with the obligations obtained from the agreements signed by the Company; to supply the information to third parties with which the Company has a contractual relationship when necessary to comply with the subject matter of the agreement.



USE OF SENSITIVE INFORMATION

The sensitive information collected will be used to perform relevant tasks within the development of the corporate purpose of the Company regarding the compliance with the purpose of the agreement made with the owner of the information; to send invitations and to offer new products; to complete processes (requests, complaints, claims); to conduct customer satisfaction surveys about the goods and services offered by the Company; to supply contact information to the sales force and/or distribution network, telemarketing, market research, and to any third party with which the Company has a contractual agreement to develop marketing activities of that type (market research, telemarketing, etc.) to conduct them; to contact the owner of the information via telephone to conduct surveys, research and/or confirmation of personal information needed to comply with a contractual relationship; to contact the owner of the information via electronic media – SMS or chat – to send news related to loyalty programs or to improvement of service; to contact the owner of the information via email to send account statements or invoices related to the obligations derived from the agreement reached by the parties, to comply with the obligations obtained from the agreements signed by the Company; to supply the information to third parties with which the Company has a contractual relationship when necessary to comply with the subject matter of the agreement.

RIGHTS OF THE OWNERS OF THE INFORMATION

As the owner of your personal information, you have the right to:

- i. Free access to the information provided and which is subject to be used.
- ii. See, update, and request to correct your information against information that is partial, inaccurate, incomplete, fragmented, leading to an error, or which has its use prohibited or unauthorized.
- iii. Request proof of the authorization given.
- iv. Present a claim to the Superintendence of Industry and Commerce (SIC) for violations to what is established in the regulation in effect.
- v. Rescind the authorization and/or request the deletion of the information, providing that there is no legal or contractual obligation which impedes its deletion.
- vi. Abstain from answering questions about sensitive information.

ASSISTANCE WITH REQUESTS, ENQUIRIES, AND CLAIMS

The Customer Care area is the department in charge of processing the requests of the owners of the information to enforce their rights.



PROCEDURE TO ENFORCE THE RIGHT TO HABEAS DATA

In accordance with the regulations on the protection of personal information, the Company presents the procedure and minimum requirements for the enforcement of your rights.

To submit and process your request, you must submit the following information:

- Full name.
- Contact information (mail and/or email address and phone contacts).
- Mode to receive a reply to your request.
- Reason(s)/fact(s) upon which the claim is based, with a brief description of the right you wish to enforce (to see, update, rectify, request proof of given authorization, rescind it, delete, access the information).
- Sign (if applicable) and identification number.

The maximum term provided by the law to resolve a claim is of fifteen (15) working days, starting on the day after its receipt. If it is not possible to attend to your claim within said term, the Company will inform the party interested the reasons for the delay and the date when their claim will be attended to, which will not exceed under no circumstance the eight (8) working days following the expiration of the first term.

Once the terms indicated in the Law 1581 of 2012, and in the other regulations which regulate or complement it, have expired, the Owner who is denied, totally or partially, the enforcement of their rights to access, update, rectify, delete, and rescind will be able to present their case to the Superintendence of Industry and Commerce – Office for the Protection of Personal Data-.

VALIDITY

The present Use of Personal Information Policy is in effect starting on the date of publication of the Company's website.

The database where the personal data will be recorded will have a validity equal to the time during which the information is maintained and used for the purposes described in this policy. Once said purpose(s) has or have been fulfilled and providing that there is no legal or contractual obligation to retain your information, your information will be deleted from our databases.