

Notice of Privacy Practices for ALFONSO RIASCOS VILLEGAS

Doctor ALFONSO RIASCOS VILLEGAS adopts the present Colombian law 1581 of 2012 and the Decree 1074 of 2015 for the processing of personal data. This Notice of Privacy Practices will be informed to all potential clients, users, suppliers, employees, and future ones that may be involved.

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i. PRIVACY NOTICE

The Privacy Notice is the physical document, electronic or in any other format, made available to the owner, informing him about the treatment of his personal data. Through this document, the owner, (you), is given of the information related to the existence of Dr. ALFONSO RIASCOS VILLEGAS personal data treatment policies; how they will be applicable; the way to access them; and the characteristics of the treatment that is intended to give personal data.

Privacy Notice must contain, as a minimum, the following information:

- A. The identity, address and contact details of the holder.
- B. The type of treatment to which the data and the purpose of the data will be submitted.
- C. The rights of the owner
- D. The general mechanisms provided by the person in charge so, that the owner knows the information treatment policy and, any changes that take place in it. In all cases, you must inform the owner how to access or consult the information processing policy.
- E. The optional nature of the response regarding questions on sensitive data

II.PERSON RESPONSIBLE FOR THE TREATMENT OR YOUR PERSONAL DATA

Company Name

Alfonso Riascos Villegas

Address

Dr. Alfonso Riascos Villegas lives in Cali, Colombia, his office is located at Carrera 39 # 5A-91, office 302, Laskin Building IMBANACO. CALI, VALLE DEL CAUCA – COLOMBIA. E-mail: protecciondedatos@alfonsoriascos.com. Phone number: +57 (2) 5145000. Cell: +57 315 8709295

III. Legal Framework

- Political Constitution, article 15. Law 1266 of 2008, Law 1581 of 2012
- Regulatory Decrees 1727 of 2009 and 2952 of 2010,
- Partial Regulatory Decree 1377 of 2013

- Sentences C - 1011 of 2008, and C - 748 of 2011, of the Constitutional Court
- Single Decree 1074 of 2015

IV. Application of the policy

This policy will apply to personal data registered in any of Dr. ALFONSO RIASCOS VILLEGAS databases and whose owner is a natural person.

V. Definitions

For this policy and under current regulations regarding the protection of personal data, the following definitions shall be taken into account:

Authorization: An expressed and informed consent of the Owner to carry out the processing of personal data.

Database: Organized set of personal data that is subject to treatment.

Successor: a person who has succeeded another because of death.

Personal data: Any information linked to or associated with one or several natural persons.

Privacy notice: A verbal or written communication generated by us, directed to the Holder for the treatment of their data.

Public data: It is data relative to civil status, profession or trade, merchant or public servant. It is not semi-private, private or sensitive. By its nature, public data may be contained, among others, in public records, public documents, gazettes, official bulletins and judicial sentences duly executed that are not subject to reservation.

Sensitive data: are those that affect your privacy or, whose improper use can generate discrimination such as revealing racial or ethnic origin, political orientation, religious or philosophical convictions, membership in unions, social rights organizations, or that promotes the interests of any political party, rights and, guarantees of the opposing political parties. Sensitive data may also be related to health, sexual life, and biometric data.

Doctor Alfonso Riascos Villegas : In Charge and Responsible for the Treatment, that by itself or in association with others, of the data, processing, and treatment of personal data.

The Person in Charge of the Treatment(we, use or our): Natural or legal person, public or private, that by itself or in association with others, performs the processing of personal data on behalf of the person Responsible for the Treatment.

Owner (you): Natural person whose personal data is subject to Treatment.

Treatment: Any operation or set of operations on personal data, such as collection, storage, use, circulation or deletion.

Transfer: the transfer of data takes place when the person in charge and/or in charge of the processing of personal data, located in Colombia, send the information or personal data to a recipient, who in turn is responsible for the treatment and is inside or outside from the country.

Transmission: The processing of personal data involves communication, within or outside the country when it is intended to carry out the treatment for Dr. Alfonso Riascos Villegas.

VI. Your Information. You're Rights.

- A. Access, know, update and rectify your personal data.**
- B. Request proof of authorization granted to DR. ALFONSO RIASCOS VILLEGAS for the processing of data.**
- C. Be informed by us, upon request, regarding the use it has given to your personal data.**
- D. Present before the Superintendence of Industry and Commerce, or other, complaints** if you feel your rights are violated.
- E. Refuse to answer questions regarding sensitive data. The answers you provide for sensitive data, children, and teenagers are optional.

F. Access, free of charge, to your personal data that have been processed, at least once every calendar month, and whenever there are substantial changes to this policy that motivate further consultations.

VII. Our commitment and Responsibilities to you.

- A. We will guarantee protect your data, image, privacy, honor, information, self-determination and freedom of information.
- B. Request and keep a copy of the authorization granted by the owner for the processing of his data.
- C. Properly inform the owner about the purpose and, the rights that assist him under the authorization granted.
- D. Keep the information under the security conditions necessary to prevent its adulteration, loss, consultation, unauthorized use or access.
- E. Guarantee that the information is true, complete, accurate, updated, verifiable and understandable.
- F. Update the information regularly in a way that all the information regarding the data of the owner is kept to date, and implementing all necessary measures for this regard.
- G. Rectify the information when it is incorrect and communicate what is pertinent.
- H. Respect the security and privacy conditions of the holder's information.
- I. Process inquiries and claims formulated in the terms indicated by law.
- J. Identify when certain information is under discussion by the owner.
- K. Inform at the request of the owner about the use given to their data.
- L. Inform the data protection authority when there are violations of the security codes and there are risks in the administration of the information of the owners.
- M. Fulfill the requirements and instructions given by the Superintendence of Industry and Commerce on a particular subject.
- N. Only use data whose treatment is previously authorized under the provisions of law 1581 of 2012.
- O. Ensure the proper use of personal data of children and juveniles, in those cases in which it is authorized to process their data.
- P. Register in the database the legend "claim in process" in the form in which it is regulated in the law.

- Q. Insert in the database the legend "information in legal discussion" once notified by the competent authority about legal processes related to the quality of the personal data.
- R. Refrain from circulating information that is being contested by the owner and whose blockade has been ordered by the Superintendence of Industry and Commerce.
- S. Allow access to information only to people who may have access to it.
- T. Use the personal data of the owner only for those purposes for which it is duly empowered and respecting in all cases the current regulations on protection of personal data.

VII. Exceptions to use or disclosure of your data

We require a free, and informed consent of the owner for the treatment of their data, except in cases expressly authorized by law, namely:

- A. Information required by a public or administrative entity in the exercise of its legal functions or by court order.
- B. Data of a public nature.
- C. Cases of medical or sanitary emergency.
- D. Treatment of information authorized by law for historical, statistical or scientific purposes.
- E. Data related to the Civil Registry of Persons

1. Who can authorize the use of your personal data

- The owner, who must prove his identity by the different means available to him by us.
- The titleholders of the owner, who must prove such quality.
- The representative and/or agent of the owner, after proof of representation or empowerment.
- Other in favor or for which the owner has stipulated.

2. Means for granting authorization

We will request authorization before storage, collection or processing of the data. This authorization will be obtained through different means, physical, electronic, a data message, Internet, Websites, or in any other format.

3. Proof of authorization

A proof of the authorization granted by the owner of the personal data will be kept, adapted and maintained in the same form given. Consequently, we may establish physical files or electronic repositories made directly or through third parties contracted for this purpose.

4. Revocation of authorization

You may at any time revoke or suppress the authorization given for the treatment of your personal data provided that it is not prevented by a legal or contractual provision. We will establish simple and free mechanisms that allow the owner to revoke his authorization or request the deletion of his personal data. It can be on the total or partial set of data collected, in which case we would immediately cease the usage totally or partially.

VIII. Treatment and purpose to which your data will be submitted

The treatment of your personal data will be done within the legal framework that regulates the matter so to fulfill our corporate mission. In this way your personal data may be collected and processed to:

- A. Develop our mission according to our statutes
- B. Comply with the norms provided by suppliers and contractors
- C. Comply with the provisions of the Colombian legal system in labor and social security matters.
- D. Carry out surveys related to goods and services which we provide
- E. Develop programs, procedures, invitations to events, and offering of new products in accordance to our mission.
- F. Fulfill all our contractual commitments with you.

Sensitive data

In the case of sensitive personal data, we may use and process it when:

- A. You have given explicit authorization, except in cases that by law is not required the granting of such authorization.
- B. The treatment is necessary to safeguard the vital interest of the owner when he or she is physically or legally incapacitated. In these events, the legal representatives must grant their authorization.
- C. The data is part of the activities and, guaranteed by an association or non-profit organization whose purpose is political, philosophical, religious or a trade union, the data cannot be provided to third parties without the authorization of the owner.
- D. The Treatment refers to data that are necessary for the recognition, exercise or defense of a right in a judicial process

E. The Treatment has a historical, statistical or scientific purpose. In this event, measures must be taken to conceal the identity of the owner or owners.

IX. Guarantee of the Right of Access

To guarantee the right of access of the owner to the data, we will make available to him, or his representative, freely, and through all type of means the personal data. This access must be offered without any limit and must allow the owner the possibility of knowing and updating them online.

X. Procedures for: Consultations, Claims, Amendments, Updating and Deleting of Data

A. Consultations

The owner or their successors in title may consult the personal information contained in our data bank. We guarantee that:

- We will enable electronic or other means of communication.
- Establish forms, systems and other simplified methods which must be informed in this privacy notice.
- The consultation will be attended within a maximum term of ten (10) business days from the date of receipt. When it is not possible to attend the consultation within this term, the interested party will be informed before the expiration of the 10 days, stating the reasons for the delay and indicating the date on which the consultation will be attended. In no case may this time exceed five (5) business days following the expiration of the first term.
- Queries may be sent to the email protecciodedatos@alfonsoriascos.com

B. Claims

You may file a complaint if you believe your privacy rights have been violated. The following rules for this will apply:

1. Your claim must be addressed to DR. ALFONSO RIASCOS VILLEGAS, e-mail protecciodedatos@alfonsoriascos.com. It should be a written communication forward to the Department of Communications, containing: your ID, address, the facts that give rise to the claim, and the documents you want to enforce. If the claim is incomplete, you will be required within five (5) days following receipt of

the claim to correct the faults, with a maximum of two (2) months before the claim is considered abandoned. You will be informed if the person who receives the claim is not competent to resolve it then the claim will then transferred to the appropriate one in a maximum time of two (2) business days.

2. The complete claim will be filed with the label "claim in process" in a term not exceeding two (2) business days.
3. The maximum term to attend the claim will be fifteen (15) business days counted from the day following the date of its receipt. When it is not possible to meet the claim within said term, the interested party will be informed of the reasons for the delay and the date on which his claim will be handled, which in no case may exceed eight (8) business days.

C. Request for update and/or amendments

At your request we will rectify and update any information that turns out to be incomplete or inaccurate, following the procedure and terms below:

- You must submit the request with support documents, to the email: protecciondedatos@alfonsoriascos.com or in a letter addressed to the Department of Communications indicating the update and/or, the amendment to be made.
- We will enable electronic or other mechanisms that facilitate the exercise of this right. These will be informed in the privacy notice and made available to those interested in the website.

D. Data deletion

You have the right to request the removal of his information in any of the following events:

1. Consider that they are not being treated according to the principles, duties, and obligations outlined in the current regulations.
2. They have ceased to be necessary or pertinent for the purpose for which they were collected.
3. The period necessary for the fulfillment of the purposes for which they were collected has been exceeded.

This deletion of your data may be total or the partial. However, this right of the owner is not absolute and consequently, we may deny the exercise of this right when:

1. The owner has a legal or contractual duty to remain in the database.
2. The elimination of data hinders judicial or administrative actions linked to financial obligations, the investigation, and prosecution of crimes or, the updating of administrative sanctions.
3. The data are necessary to protect the legal interests of the owner, to perform an action based on the public interest, or to comply with an obligation legally acquired by the owner.

XI. National Database Registry

We reserve the faculty to maintain and catalog certain information that rests in our bases or data banks as confidential following current regulation and bylaws. We will also proceed to register your databases before the National Registry of Databases (RNBD) following the current regulations issued by the National Government for this purpose. The RNBD, is the public directory of databases free of consultation for citizens, under the regulations issued by the National Government.

XII. Security of Information and Security Measures

In compliance with the safety principle established in the current regulations, we will adopt the technical, human and administrative measures that are necessary to grant security to the records avoiding their adulteration, loss, consultation, use or unauthorized or fraudulent access.

XIII. VALIDITY

This policy applies as of September 20, 2017 and leaves without effect the regulations or special manuals that could have been adopted previously by the DR. ALFONSO RIASCOS VILLEGAS.