

**FUNDACIÓN BOLÍVAR DAVIVIENDA POLICIES AND
PROCEDURES MANUAL FOR PERSONAL DATA PROTECTION**

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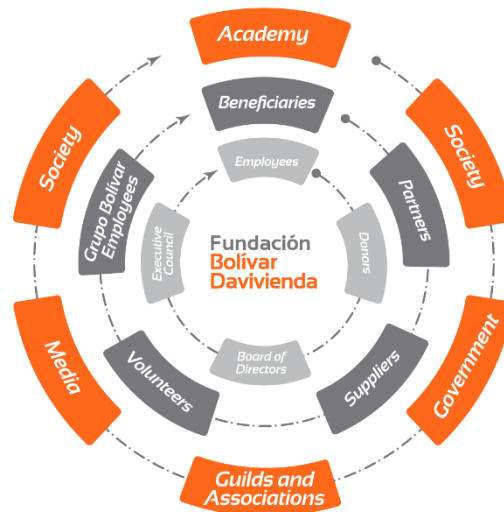
1. INTRODUCTION

Fundación Bolívar Davivienda bearing Tax Identification Number 860.076.173-2 (hereinafter **LA FUNDACIÓN**).

LA FUNDACIÓN as expression of the social commitment of Grupo Empresarial Bolívar, supports and strengthens transforming and high-impact development projects that generate capacities in people, communities and organizations, to build a fairer, more equal and innovative society.

LA FUNDACIÓN aims to promote and advance activities that contribute to the development of society and, to comply with such purpose, it develops programs to support and promote family life and social cohesion, to encourage children and adolescents to develop their potential, family productivity, health and rehabilitation, journalism, art and culture.

In furtherance of its corporate purpose, **LA FUNDACIÓN** is aware and may become aware of personal information of those encompassing its stakeholders. Stakeholders of **LA FUNDACIÓN** are:



In development of established relationships with its stakeholders, **LA FUNDACIÓN** receives personal, private, public and, in some cases, sensitive information. Such information managed and processed by **LA FUNDACIÓN** has a private nature; therefore, the secrecy of the information is ensured.

LA FUNDACIÓN adopts the following policy manual for the processing of personal data ensuring adequate compliance with Law 1581 of 2012, Decree 1377 of 2013 and other regulatory decrees on the protection of personal data and makes available to Data Subjects the channels and means necessary for them to exercise their rights, which are specified in Chapter 10 of this manual.

2. OVERVIEW

2.1. RIGHT TO HABEAS DATA

Article 15 of the C.P. establishes the right of all individuals to know, update and rectify the information collected about them in databases or files of both public and private entities. Likewise, and in accordance with Constitutional Court Ruling C-748 of 2011, this right includes other powers such as authorizing the Processing, including new data or excluding or deleting the same from a database or file.

This right was developed by Constitutional case law since 1991 to 2008, at which point the Special Law on Habeas Data was enacted. This regulation governs what has been called "financial habeas data", the right of each individual to know, update and rectify his/her commercial, credit, and financial personal information contained in public or private information centers, which have the function of collecting, processing and circulating such data in order to determine the level of financial risk of its Data Subject. This Special Law considers both natural and legal persons as Data Subjects.

Subsequently, on October 17, 2012, Law 1581 or "General Law on the Protection of Personal Data" was enacted, which law develops the right of Habeas Data from a broader perspective than the financial and credit view mentioned above. Thus, any Personal Data Subject has the power to control the information that has been collected about him/herself in any database or file, managed by private or public entities. Under this General Law only natural persons may be Data Subjects and only in special situations provided for by the Constitutional Court in ruling C-748 of 2011, legal persons could be Data Subjects.

2.2. PURPOSE

The Policy and procedures provided for in this Manual seek to sufficiently develop the constitutional right to Habeas Data held by all people with respect of whom **LA FUNDACION** collects, stores, uses, circulates and deletes personal information.

Likewise, the personal contact data obtained from the authorization granted by the data subjects of the various companies of the Group will be administered and protected in

accordance with the philanthropic purpose pursued by **LA FUNDACIÓN** and will be treated following the provisions of Law 1581 of 2012.

2.3. EXTENT

This policy applies to all personal information recorded in the physical and/or digital databases of **LA FUNDACION**, which acts as the data controller of personal data.

It is part of the commitment of **LA FUNDACIÓN** to ensure that all relationships involving the fact of knowing or sharing personal information comply with the principles and duties set forth in the Law.

2.4. SCOPE OF APPLICATION

This policy applies to all types of personal data processed in the information systems, as well as in the physical or digital files of **LA FUNDACION**, which acts as the data controller of personal data.

All collaborators and suppliers acting as processors, who process personal data in the custody of the organization are obliged to become familiar with, internalize and comply with this policy.

2.5. OBLIGATIONS

This policy is mandatory for and should be strictly complied by **LA FUNDACIÓN** who acts as controller of personal data.

2.6. DATA CONTROLLER

Fundación Bolívar Davivienda bearing NIT (Tax Id) 860.076.173-2 non-profit entity located at Calle 26 (Avenida El Dorado) No. 69-63 Piso 11, in the city of Bogotá D.C. and Phone NO. (1) 2201610 Ext 98706.

3. DEFINITIONS

For the recipients of this policy to be clear on the terms used throughout the same, the definitions provided by the General Law, as well as those relating to the classification of data in accordance with the Special Law, are included below.

3.1. Authorization

Prior, express and informed consent of the Data Subject to carry out the Processing of personal data.

3.2. Database

Organized set of personal data that is subject to Processing, both by public and private entities. It includes data deposits contained in documents that have file quality.

3.3. Personal Data

Any information related or that may be associated with one or more natural persons determined or determinable.

3.4. Public Data

Any information not being semi-private, private or sensitive. Public data, including data relating to the marital status of people, their profession or trade and their status as a trader or public servant, are considered. By their nature, public data may be contained, among others, in public records, public documents, gazettes and official bulletins and duly executed court rulings that are not subject to secrecy.

3.5. Semi-Private Data

Any information that is not intimate, reserved, or public in nature and whose knowledge or disclosure may interest not only its owner but a certain sector or group of people or society in general, such as the financial and credit data of commercial activity or services.

3.6. Private Data

Any information that by its intimate or reserved nature is only relevant to the Data Subject.

3.7. Sensitive Data

Any information that affects the privacy of the Data Subject or the misuse of which may result in discrimination, such as those that reveal racial or ethnic origin, political orientation, religious or philosophical beliefs, membership to trade unions, social organizations, human rights or that promotes the interests of any political party or that guarantee the rights and guarantees of opposition political parties as well as health data, sex life and biometric data.

3.8. Data Processor

Natural or legal person, public or private, who by itself or in association with others, performs the Processing of personal data on account of the Data Controller.

3.9. Data Controller

Natural or legal person, public or private, who by itself or in partnership with others, decides on the database and/or the processing of data. E.g.: **Fundación Bolívar Davivienda**.

3.10. Data Subject

Natural person whose personal data are subject to Processing. E.g.: The beneficiaries of the different programs.

3.11. Transfer

The transfer of data takes place when the Data Controller and/or Data Processor, located in Colombia, sends the information or personal data to a recipient, who in turn is a Data Controller and is located inside or outside the country.

3.12. Transmission

Processing of personal data involving the communication of the same within or outside the territory of the Republic of Colombia when it is intended to carry out a Processing by the Processor on account of the Controller.

3.13. Processing

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

4. PRINCIPLES

It is a commitment of **LA FUNDACIÓN** to understand and consistently develop the principles established in the General Law.

The following are the principles contained in Law 1581 and Regulatory Decree 1377:

4.1. **Principle of legality in the field of data processing:** The Processing referred to in this law is a regulated activity that must be subject to the provisions thereof and other provisions that develop the same;

4.2. **Principle of purpose:** Processing must relate to a legitimate purpose in accordance with the Constitution and the Law, which must be informed to the Data Subject;

4.3. **Principle of freedom:** The Processing can only be exerted with prior, express and informed consent of the Data Subject. Personal data may not be obtained or disclosed without prior authorization, or in the absence of a legal or judicial mandate that replaces the consent;

4.4. **Principle of veracity or quality:** The information subject to Processing must be true, complete, accurate, updated, verifiable and understandable. The Processing of partial, incomplete, fractional or error-induced data, is prohibited;

4.5. **Principle of transparency:** Processing should guarantee the right of the Data Subject to obtain from the Data Controller or Data Processor, at any time and without restriction, information about the existence of data concerning him/her;

4.6. Principle of access and restricted circulation: Processing is subject to the limits arising from the nature of personal data, the provisions of this law and the Constitution. In this sense, the Processing may only be performed by people authorized by the Data Subject and/or by the people provided for in this law;

Personal data, except public information, may not be available on the Internet or other means of disclosure or mass communication, unless access is technically controllable to provide restricted knowledge only to Data Subjects or third parties authorized under this law;

4.7. Principle of Security: Information subject to Processing by the Data Controller or Data Processor referred to in this law shall be handled with the technical, human and administrative measures necessary to provide security to records avoiding its adulteration, loss, unauthorized or fraudulent consultation, use or access;

4.8. Principle of confidentiality: All people involved in the Processing of non-public personal data are obliged to guarantee the secrecy of the information, even after the completion of their relationship with any of the tasks understood by the Processing, being able to only provide or communicate personal data when this corresponds to the development of the activities authorized in this law and in the terms of this law;

4.9. Need and proportionality: Personal data recorded in a database must be such data strictly necessary for the fulfillment of the purposes of the Processing, informed to the Data Subject. In this sense, data should be appropriate, relevant and in line with the purposes for which such data was collected;

4.10. Temporary nature or expiration: The period of retention of personal data will be necessary to achieve the purpose for which the same was collected;

4.11. Comprehensive interpretation of constitutional rights: Law 1581 of 2012 shall be interpreted as adequately protecting constitutional rights, such as habeas data, the right to a good name, the right to honor, the right to privacy and the right to information. The rights of data subjects shall be interpreted in harmony and in a level of balance with the right to information provided for in article 20 of the Constitution and with the other applicable constitutional rights.

5. PROCESSING AND PURPOSES

LA FUNDACIÓN processes written, electronic and/or online personal information from participants, beneficiaries and volunteers, including data related to the profession, trade and, in some cases, those related to the corporate relationship with any company or social organization. As well information from partners, employees, suppliers and contractors, and generally data subjects from whom it collects, stores, uses, circulates, erases and/or deletes information for the following purposes:

5.1. PURPOSES PROVIDED FOR THE DATABASES OF THE STAKEHOLDERS:

- Verify reference data and in some cases know and track financial suitability, business behavior.
- Participate in the different programs, activities and events carried out directly by **LA FUNDACIÓN** or through partnerships with State institutions, civil society, educational and private sector, foundations or social organizations.
- Perform analysis of interests and preferences, seeking to offer or develop programs, projects and activities that fit people's needs.
- Evaluate, maintain, improve and deepen the impact and evolution of **LA FUNDACIÓN** programs.
- Provide information on events, news, communication, and marketing related to **LA FUNDACIÓN** in the development of foundational programs.
- Disseminate the activities of **LA FUNDACIÓN** in television or radio programs, websites, streaming, social networks, video sharing platforms and/or editing or advertising material prepared by **LA FUNDACIÓN**.
- Keep accounting records, as well as provision and make the payment and/or collection of the contributions made.
- Commercialize products and services to support the sustainability of social, creative, cultural or artistic projects of **LA FUNDACIÓN**.
- Transfer basic contact information, i.e., name, citizenship card No., and email to entities that may supplement the offer to our beneficiaries, so that they identify the Data Subject as the current Beneficiary of **LA FUNDACIÓN** and contact him/her to offer new services.
- Transmit personal data outside the country to third parties with whom **LA FUNDACIÓN** has signed a data processing contract and as necessary to provide them with the same for the fulfillment of the contractual object.
- Share personal information with the companies encompassing Grupo Empresarial Bolívar whose list is available on website www.grupobolivar.com, option "Our Companies", and between Fundación Bolívar Davivienda and Fundación Cultiva el Arte y la Cultura, to inform their social, cultural and/or business activities.
- Share statistical information with territorial entities or any State entity, when the development of the respective social program is carried out in partnership with any of them; efforts will be made to the extent permitted by the respective agreements, to share only anonymized information.

- Control access to facilities and ensure the security of people participating in the program.

In such cases where beneficiaries have included personal data from third parties in the different information collection scenarios provided by **LA FUNDACIÓN**, the beneficiary must inform the holder of the information about that fact and authorize on their behalf by stipulating in favor of or for another individual, as pointed out by Article 2.2.25.4.1., Chapter 25 of Decree 1074 of 2015 to process their information in order for them to acquire the quality of beneficiaries of **LA FUNDACIÓN** and to participate in some activities. Likewise, the information may be processed to contact him/her in case of medical emergency, natural disasters and/or any event that jeopardizes the integrity of the Data Subject.

5.2. ADDITIONAL PURPOSES FOR THE FACULTY:

- To analyze my artistic proposal and evaluate a possible contract.
- To develop the contract purpose for which I have been hired or linked to the project.
- To receive information regarding news, events, novelties, communication, marketing and progress of the Filarmónica Joven de Colombia's process.
- To be invited to concerts, events or activities of the Filarmónica Joven de Colombia.
- To participate in the development of relevant research for the cultural sector.

5.3. ADDITIONAL PURPOSES FOR THE FACULTY STAFF:

- To analyze my artistic proposal and evaluate a possible contract.
- To develop the contract purpose for which I have been hired or linked to the project.
- To receive information regarding news, events, novelties, communication, marketing and progress of the Filarmónica Joven de Colombia's process.
- To be invited to concerts, events or activities of the Filarmónica Joven de Colombia.
- To participate in the development of relevant research for the cultural sector.

5.4. ADDITIONAL PURPOSES FOR THE ARTISTIC CONTACT:

- To be contacted in order to find out the current status of the artistic process carried out with the Institution's students.
- To provide support from the Filarmónica Joven de Colombia so that they can complement the artistic process.
- To invite them to continuous training processes, for their professional development, performed by LA FUNDACIÓN or through its Allies, with whom there is an agreement.

5.5. ADDITIONAL PURPOSES FOR THE PRACTITIONERS:

- To control and follow-up the social practices performed at the Cultivarte headquarters.
- To certify the Educational Institution regarding the performance of the social practice.
- To generate internal statistics of the activities performed by the practitioner.

- To contact the social practitioner's guardian in case of medical emergency, personal incidents, natural disasters and/or any event that puts the minor's integrity at risk.

5.6. ADDITIONAL PURPOSES FOR THE PLAYMAKERS:

- To generate internal statistics of the activities performed at the Cultivarte headquarters.
- To send details of the Cultivarte program.
- To locate the family member or contact person in case of medical emergency, personal incidents, natural disasters and/or any event that puts my integrity at risk.

5.7. ADDITIONAL PURPOSES FOR THE MEMBERS OF THE MAYORS' OFFICES:

- To develop the specific activities of the alliance, including sending relevant information to execute the agreement, perform it and terminate it.
- To generate and/or send statistics or reports of the activities performed at the Cultivarte headquarters with whom there is an agreement.
- To send details of the Cultivarte program.
- To contact them in the event of a medical emergency, personal incidents, natural disasters and/or any event that puts the integrity of the people who attend the Cultivarte venues at risk.

5.8. PURPOSES PROVIDED FOR DATA OBTAINED FROM SUPPLIERS AND FORMER SUPPLIERS - INDIVIDUALS:

- Contact and engage them in the selection process as suppliers, which does not imply the obligation of LA FUNDACIÓN to contract any type of service or product with the Suppliers.
- Be aware of and track financial suitability and business behavior including consultation in public, private sources that act legitimately and validation of personal and commercial references.
- Develop the activities of the contracts executed, including the delivery of relevant information to enter into the contract, its performance and termination.
- Keep accounting records, as well as provision and make payments for the services provided.
- Tracking and validating the quality of the product offered or service provided; this purpose may involve obtaining biometric information such as images, voice and digital signature. The data referred to herein is considered sensitive and for such reason it is informed that the data subject's response is optional, while indicating that by the nature of the services they become essential.
- Share contact information with the companies encompassing Grupo Empresarial Bolívar whose list is available on the digital platform www.grupobolivar.com, option "Our Companies" to validate the references, quality, performance and to make it part of supplier selection processes held by such companies.
- Share supplier's contact information with the same companies of Grupo Bolívar to be offered products and services that may be supplier's interest.

5.9. EXPRESS PURPOSE TO SHARE PERSONAL DATA BETWEEN FUNDACIÓN BOLÍVAR DAVIVIENDA, FUNDACIÓN CULTIVA EL ARTE Y LA CULTURA AND GRUPO BOLIVAR COMPANIES:

- Share personal information between Fundación Bolívar Davivienda and Fundación Cultiva el Arte y la Cultura, as well as with such companies encompassing Grupo Empresarial Bolívar whose list is available on website www.grupobolivar.com, option "Our Companies" and Employees' Funds in order to inform them of social, cultural and/or business activities through different media.

In general, for the above purposes, **LA FUNDACIÓN** may send short text messages (SMS), multimedia messages (MMS), emails, messages by mobile phone or landline, physical mail and social networks or digital media to carry out the purposes previously stated in the different databases.

LA FUNDACIÓN informs that for the development of its programs it will process personal data of minors, in view of the quality of participants or beneficiaries of the activities or projects, as well as sensitive information thereof, including: biometric data such as the image, or any other physical trait that may be recorded in audio recordings, photographs and videos, footprint and health-related information. The authorization of personal data of minors is optional and the purposes indicated relate to their best interests. To this end, the data subject or his/her representative is free to answer the questions when they relate to this type of data. However, it also emphasized that this information is relevant for the development of the purposes for which the person consents.

Likewise, when **LA FUNDACIÓN** processes personal data within the framework of a cooperation agreement with public or private entities, it will make its maximum effort so that the information known to or delivered to the partner is exclusively anonymized statistical information.

LA FUNDACIÓN recalls the importance of keeping updated information, which enables the same to inform in a timely manner about the matters of interest and contact for the purposes authorized by the Data Subject. Likewise, it indicates that the data may be processed for compliance with the constitutional, legal, judicial, administrative, and regulatory requirements provided for in the Colombian legal order, as well as for the requests submitted by the Data Subject.

6. DUTIES AS DATA CONTROLLER

- Ensure through the channels of assistance established by **LA FUNDACIÓN**, the full and effective exercise of right to habeas data.
- Retain authorizations granted by Data Subjects by any means; the file, consultation and administration thereof will be in charge of **LA FUNDACIÓN**.
- **LA FUNDACIÓN** will inform about the purpose of the collection, both in the text used to obtain authorization, and in the Privacy Notice.
- **LA FUNDACIÓN** will retain the information provided under the necessary security conditions to prevent its adulteration, loss, unauthorized or fraudulent consultation, use or access.
- **LA FUNDACIÓN** will ensure that the information provided to the Data Processor is true, complete, accurate, updated, verifiable and understandable.

It is important to note at this point that the effective collaboration of Data Subjects with regard to the updating of their information, in the data known in the first instance by them, will be essential for the optimal fulfillment of this duty to inform the Data Processor about all the news regarding the data that have been provided to the same.

- **LA FUNDACIÓN** will update the information, reporting the Data Processor in a timely manner, of all the news regarding the data it has previously provided and take the other necessary measures to keep updated the information provided to it.
- **LA FUNDACIÓN** will rectify the information when it is incorrect and communicate as the case may be to the Data Processor.
- **THE FOUNDATION** will provide the Data Processor, as the case may be, with only data whose Processing is previously authorized in accordance with the provisions of Law 1581 of 2012.
- **LA FUNDACIÓN** will require the Data Processor at all times to respect the security and privacy conditions of the Owner's information.
- **THE FOUNDATION** will adopt an internal manual of policies and procedures to ensure proper compliance with Law 1581 of 2012 and in particular for the attention of consultations and complaints.

- **LA FUNDACIÓN** will inform the Data Processor when certain information is under discussion by the Data Processor, once the claim has been filed and the respective procedure has not been completed.
- **LA FUNDACIÓN** will inform the Superintendency of Industry and Commerce (SIC) when security code violations occur and there are risks in the administration of the Data Subjects' information.

7. DUTIES AS DATA PROCESSOR

The law provides that the Data Processor is the natural or legal person, public or private, who by itself or in association with others, performs the processing of personal data on account of the data controller. Its duties are:

- 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, unauthorized or fraudulent consultation, use or access;
- Perform in a timely manner the updating, rectification or deletion of the data in the terms of this law;
- Update the information reported by the Data Controllers within five (5) business days of receipt;
- Process inquiries and claims made by Data Subjects in the terms indicated in this law;
- Adopt an internal manual of policies and procedures to ensure proper compliance with this law and, in particular, for the attention of consultations and complaints by Data Subjects;
- Record in the database the legends "pending claim" as regulated in this law;
- Insert into the database the legend "information in judicial discussion" once notified by the competent authority about judicial proceedings related to the quality of personal data;
- Refrain from circulating information that is being disputed by the Data Subject and whose blocking has been ordered by the Superintendency of Industry and Commerce;

- Allow access to information only to people who are allowed to access the same;
- Inform the Superintendency of Industry and Commerce when security code violations occur and there are risks in the administration of Data Subjects' information;
- Comply with the instructions and requirements of the Superintendency of Industry and Commerce.

8. DATA SUBJECTS' RIGHTS

- Know, update and rectify the data subject's personal data vis-à-vis **LA FUNDACIÓN**. This right may be exercised, among others against partial, inaccurate, incomplete, fractional data, that induce to error, or those whose Processing is expressly prohibited or has not been authorized.
- Request proof of authorization granted to **LA FUNDACIÓN**, except where expressly exempted by law as a requirement for the Processing.
- Be informed by **LA FUNDACIÓN**, upon request, regarding the use given to the personal data.
- Once the consultation or complaint process has been exhausted before **LA FUNDACIÓN**, file with the Superintendence of Industry and Commerce complaints for violations of the provisions of Law 1581 of 2012 and other rules that modify, add or complement the same.
- Revoke the authorization and/or request the deletion of the data when the Processing does not respect the constitutional and legal principles, rights and guarantees, or whenever there is no legal or contractual duty requiring its preservation.
- Access on a free basis to their personal data that has been Processed by **LA FUNDACIÓN**, in the terms of Law 1581 of 2012.

9. PROCEDURES ESTABLISHED TO ENSURE THE EXERCISE OF DATA SUBJECTS' RIGHTS

9.1. INQUIRIES

Data Subjects or their successors, in the cases provided by law, may consult their information held in databases managed by **LA FUNDACIÓN**.

Data Subjects must prove their identity as follows:

- a) Applications submitted through written document: attach a copy of the citizenship card.
- b) Successors must prove the kinship by attaching a copy of the deed where the succession is opened for process and a copy of their identity document.
- c) Proxies shall present an authenticated copy of the power of attorney and their identification document.

Once **LA FUNDACIÓN** receives the request for information through any of the channels indicated above, it will proceed to review the individual registration corresponding to the name of the Data Subject and the id number provided; if it finds any difference between these two data, it will inform accordingly within five (5) working days of receipt, in order for the applicant to clarify.

If upon review of the document provided and the name of the Data Subject, it finds that there is conformity therein, it will proceed to respond within ten (10) working days.

In the event in which **LA FUNDACIÓN** considers that it requires a longer time to respond to the inquiry, it will inform the Data Subject of such situation and give answer in a term that will not exceed five (5) working days following the expiration of the term.

9.2. CLAIMS

Data Subjects or their successors who consider that the information contained in a database administered by **LA FUNDACIÓN** must be subject to correction, updating or deletion, or if they notice a breach by them or any of their Processors, may file a claim with **LA FUNDACIÓN** or the Processor, in the following terms:

The claim will be made before **LA FUNDACIÓN** or the Data Processor, accompanied by the document identifying the Data Subject, the clear description of the facts that give rise to the claim, the address where he/she wishes to receive notices, either physical or electronic and attaching the documents that he/she intends to enforce.

If the claim is incomplete, the data subject will be required within five (5) days of receipt of the claim to complete the failures.

Two (2) months after the date of the request, without the applicant presenting the required information, it shall be understood that he/she has withdrawn the claim.

In the event that **LA FUNDACIÓN** or the Processor to whom it is addressed is not competent to resolve it, it shall transfer to the appropriate person within a maximum period of two (2) working days and inform the interested party of the situation.

LA FUNDACIÓN will use an email for these purposes in such a way that it can be identified at what time is notified and provided with response or confirmation of receipt.

If **LA FUNDACIÓN** does not know the person to whom it is to be transferred, it shall immediately inform the Data Subject.

Once the complete claim is received, the legend "pending claim" and the reason for the claim must be included in the corresponding database; this must occur within a maximum term of two (2) business days.

The maximum term for responding to the claim is 15 working days, if it is not possible to do so in this term, the interested party will be informed of the reasons for the delay and the date on which it will be addressed, which may not exceed eight (8) working days following the expiration of the first term.

LA FUNDACIÓN shall be responsible for ensuring compliance with these provisions to ensure that all aspects indicated are duly collected and that the duties stipulated by the Law are fulfilled.

10. CHANNELS FOR ASSISTANCE AND INQUIRIES

The channels established for the exercise of the rights of inquiries, updating, rectification and deletion by the Data Subject are:

- Email: contacto@fundacionbd.org.
- Landline in Bogota: (1) 2201610 Ext 98706.

11. SECURITY MEASURES

LA FUNDACIÓN will handle the information stored in its databases with the necessary technical, human and administrative measures to grant security to the records avoiding their adulteration, loss, consultation, use or unauthorized or fraudulent access.

12. AMENDMENT OF PROCESSING POLICIES

The Data Processing Policy of LA FUNDACIÓN is available on the websites and any material changes to the terms of this personal data processing policy, as well as the privacy notice, will be reported through the organization's website.

- **Fundación Bolívar Davivienda**
<https://www.fundacionbolivardavivienda.org/>

13. EFFECTIVENESS AND PUBLICATION OF DATA PROCESSING POLICY

This version of the Manual of Policies for the Processing of Personal Data came into force from its publication, which was first made in 2013 and its last update was made and approved in April 2020.

LA FUNDACIÓN will retain personal data as long as they are necessary or relevant for the purpose for which they were collected, or within the term established in a legal provision, or to meet requests from an administrative or judicial body.

AMENDMENTS	
Date of amendment	Article and topic
February 3, 2014	3.4 PURPOSE The information was supplemented to include the purpose common to all the databases of LA FUNDACIÓN, which consists of informing the Data Subjects about the development of their cultural and social activities, as well as to inform them of the activities and events that it carries out, which had been included in the privacy notice since July 2013. The purpose of the database of the Simón Bolívar Journalism Prize was

	<p>complemented to include the possibility of informing about the development of cultural and social activities of the Grupo Bolívar companies and, in particular, those that develop the Simón Bolívar National Journalism Award.</p>
February 3, 2014	<p>It included the possibility of sending information on the activities of the Bolívar Group companies in the interest of the recipients.</p>
January 3, 2017	<p>1. CHAPTER IV - <u>PROCESSING AND PURPOSES</u> Updating the purposes to be given to the processing of personal data of FBD data subjects</p> <p>1. CHAPTER VII <u>CHANNELS FOR ASSISTANCE AND INQUIRIES</u> Change of the channel for assistance and inquiries in the processing of personal data.</p>
December 2018	<p>2.6. DATA CONTROLLER Fundación Cultiva el Arte y La Cultura is added as a data controller of personal data.</p> <p>The customer and employee database is included.</p> <p>The purposes are organized for each database.</p>
March 2020	<p>The publication channel of the Policy is unified. It includes ANNEX 1. FUNDACIÓN BOLÍVAR DAVIVIENDA, FUNDACIÓN CULTIVA EL ARTE Y LA CULTURA AND BANCO DAVIVIENDA S.A.</p>

April 2020

Change in the channels for attending claims and complaints of LA FUNDACIÓN.

Name change of the database and adjustment to the purposes.

Fundación Cultiva el Arte y La Cultura is deleted as data controller of personal data in this policy and Annex 1.

FUNDACIÓN CULTIVA EL ARTE Y LA CULTURA AND BANCO DAVIVIENDA S.A.