

	PROCESSING OF PERSONAL DATA	Código: SIG-PL-0011	
		Date: 02/15/2023	
		Version: 002	Date of Update: 03/30/2026

In compliance with the provisions of Statutory Law 1581 of 2012 and its Regulatory Decrees, the company establishes the General and Special Policies applicable to the Processing and Protection of Personal Data within the organization.

1. IDENTIFICATION OF THE DATA CONTROLLER

MASTERCOL TRADING S.A.S., a commercial company identified with Tax ID (NIT) 901.291.125-8, is a Colombian company whose corporate purpose is to export parchment and green coffee and to provide services related to the trading of such goods.

Physical Address	Cra 9 No. 80 – 45, Office 302, Bogotá D.C., Colombia
Website	https://mastercol.co/
Phone	+57 317 335 4316
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2. OBJECTIVE

This Policy establishes the general guidelines for the protection and processing of personal data within the company. It aims to strengthen the level of trust between the data controller and the data subjects with regard to the processing of their information; to inform data subjects of the purposes and transfers to which their personal data may be subjected; and to outline the mechanisms and procedures available for the exercise of their rights.

3. SCOPE

This Personal Data Processing and Protection Policy applies to all databases and/or files containing personal data that are subject to processing by MASTERCOL TRADING S.A.S. as the data controller.

4. DEFINITIONS

4.1. Authorization:

Prior, express, and informed consent granted by the Data Subject for the processing of their personal data. Such consent may be provided in writing, verbally, or through unequivocal conduct that clearly demonstrates the Data Subject's agreement.

4.2. Privacy Notice:

A verbal or written communication intended to inform the Data Subject about the existence of a Personal Data Processing Policy applicable to the handling of their information.

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4.3. Database / Data Bank:

An organized set of personal data subject to processing by the Company, which meets the requirements for registration before the competent authority, when required by applicable law. Databases are considered information assets containing structured data — stored in physical or digital media — relating to, among others, potential customers, customers, suppliers, and employees.

4.4. Personal Data:

Any information linked to or that can be associated with one or more identified or identifiable natural persons. Personal data is classified as follows:

- **Public Data:** Data that is neither private nor sensitive. Examples include name, identification number, marital status, and gender, among others.
- **Private Data:** Data that, due to its intimate or confidential nature, is only relevant to the Data Subject, such as salary or financial information.
- **Sensitive Data:** Data that affects the privacy of the Data Subject or whose misuse may lead to discrimination. This includes information revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, membership in social or human rights organizations, or affiliation with political parties or opposition groups. It also includes health data, data concerning sexual life, and biometric data such as images, fingerprints, photographs, iris scans, and voice, facial, or palm recognition data. Personal data of minors shall be treated as sensitive data.

4.5. Data Processor:

A natural or legal person, whether public or private, that processes personal data on behalf of the Data Controller, either independently or jointly with others.

4.6. Data Controller:

A natural or legal person, whether public or private, that decides on the database and/or the processing of personal data, either independently or jointly with others.

4.7. Information Repository:

An organized set of data stored on physical or digital media, which may or may not contain personal data of Data Subjects, and which is not subject to registration before regulatory authorities.

4.8. Data Subject:

The natural person whose personal data is subject to processing.

4.9. Transfer:

The sending of personal data by the Data Controller and/or Data Processor, located in the country where the operation is carried out, to a recipient who is also a Data Controller and is located within or outside such country.

4.10. Transmission:

The processing of personal data involving the communication of such data within or outside the country where the operation is carried out, for the purpose of enabling a Data Processor to carry out processing on behalf of the Data Controller.

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4.11. Processing:

Any operation or set of operations performed on personal data, including but not limited to collection, storage, use, circulation, or deletion.

5. POLICY DEVELOPMENT

5.1 Legal Framework

This personal data processing policy is structured to ensure compliance with the applicable data protection regulations currently in force in Colombia.

5.2 Data Processing Principles

The Company will apply the following principles, which govern the collection, management, use, processing, storage, and exchange of personal data:

5.2.1. Legality

Personal data processing must be carried out in accordance with the applicable legal provisions in force.

5.2.2. Purpose

Personal data collected must be used for a specific and explicit purpose permitted under applicable law. The data subject must be clearly, fully, and proactively informed of the purpose for which their data is being processed.

5.2.3. Freedom

Personal data may only be collected with the prior, express, and informed authorization of the data subject.

5.2.4. Accuracy and Quality

Information subject to personal data processing must be truthful, complete, accurate, current, verifiable, and understandable. Processing of partial, incomplete, fragmented, or misleading data is strictly prohibited.

5.2.5. Transparency


In all personal data processing activities, the data subject's right to obtain from the Company, at any time and without restriction, information about any personal data of interest or relevance to them must be guaranteed.

5.2.6. Restricted Access and Circulation

Personal data — except for data classified as public — must not be made available on the internet or through mass media channels. In all cases, processing must be carried out in accordance with applicable legal provisions.

5.2.7. Security

Personal data subject to processing must be managed with all necessary security measures to prevent loss, alteration, unauthorized access, or fraudulent use.

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5.2.8. Confidentiality

All individuals who manage, handle, update, or have access to personal information are required to keep it strictly confidential and not disclose it to third parties, including any commercial, accounting, financial, credit-related, or any other type of information accessed in the course of their duties. This obligation extends to third-party partners or collaborators engaged with the Company under any contractual or non-contractual arrangement.

5.3 Purposes for Which Personal Data Is Processed by the Company

The following are the purposes for which the Company will process personal data:


5.3.1. Human Resources Management

- Managing and operating — directly or through third parties — recruitment and hiring processes, including the evaluation and screening of candidates, verification of professional and personal references, and the conduct of background checks.
- Carrying out human resources activities within the Company, including payroll processing, enrollment with health and pension service providers, occupational health and wellness programs, and the exercise of the employer's disciplinary authority, among others.
- Registering employees in the Company's information systems for the purpose of carrying out accounting, administrative, and financial activities related to the employment relationship.
- Processing all payments arising from the execution of the employment contract and/or its termination, including applicable social benefits as required by law.
- Contracting employee benefits with third parties, such as life insurance and medical expense coverage, among others.
- Notifying authorized contacts in the event of emergencies occurring during or in connection with working hours.
- Coordinating professional development and employee training programs, as well as providing access to the necessary IT resources for such purposes.
- Planning company activities that may require information about employees' minor children.

5.3.2. Customers and Users

The Company collects and stores its customers' personal data in a database that the Company classifies as confidential. This information will only be disclosed with the express authorization of the data subject or when required by a competent authority. The purposes for which customer data is processed include:

- Accounting control and record-keeping of obligations arising from customer relationships.
- Compliance with tax and legal obligations before public and regulatory entities.
- Fulfillment of contractual obligations; accordingly, information may be shared with third parties such as financial institutions, notaries, and attorneys, among others.

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- Compliance with judicial decisions and administrative, legal, fiscal, and regulatory provisions.
- Transmission of information and personal data in audit processes.
- Administrative management throughout the pre-contractual, contractual, and post-contractual stages.
- Registration of the customer in the Company's platforms or software systems.
- Ensuring the delivery of physical and chemical verification services for coffee crops.
- Ensuring compliance with the rights granted to data subjects under Law 1581 of 2012.
- Conducting commercial prospecting and marketing activities.
- Evaluating customer service and conducting satisfaction surveys.
- Sharing information with third-party partners who collaborate with the Company and who, in the course of fulfilling their obligations, may need access to certain data; such partners are equally bound by the same obligations of confidentiality, information handling, and personal data protection that apply to the Company.
- Processing requests, complaints, or claims submitted directly by the customer through established service channels.
- Contacting customers through physical and electronic means — including email, SMS, or chat — to share information of interest, updates related to the contractual relationship, invitations to training sessions, or the Company's service portfolio.
- Maintaining commercial contact with the Company, even after the contractual relationship has ended.
- Consulting, as a good business practice or legal obligation, customer records against restricted lists, including OFAC, PEPs, the Clinton List, and UN lists, for the purpose of preventing money laundering and the financing of terrorism.

In all cases, personal data will not be processed beyond the duration of the contractual relationship between the customer and the Company, plus any additional period required by applicable legal or contractual circumstances.

5.3.3. Suppliers and Contractors

- Registering contractors and suppliers in the Company's systems and processing their payments.
- Formalizing the contractual, conventional, or legal relationship for the purpose of managing the administrative, accounting, financial, operational, and logistical aspects associated with fulfillment of the contract.
- Training contractors, vendors, and agents on the fundamental aspects of commercial management of the Company's products.
- Conducting commercial and reputational background checks and assessing potential risks related to money laundering and the financing of terrorism.
- Evaluating supplier or contractor performance and results to strengthen procurement and purchasing processes.

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The following purposes apply to customers, users, suppliers, and contractors across the categories listed below:

5.3.4. Commercial Strategy, Alliances, and Business Collaborations

- Sharing information domestically and internationally with third-party partners of the Company who support or contribute to the proper delivery of the services offered.
- Managing communication and customer loyalty activities.
- Transferring collected information to different departments within the Company and to affiliated companies when necessary for operational purposes, such as accounts receivable, treasury, and accounting, among others.
- Allowing affiliated companies — with which the Company has entered into agreements containing provisions to ensure the security and proper handling of personal data — to contact the data subject for the purpose of offering goods or services of interest.

5.3.5. Administrative and Compliance Management

- Registering the entry of individuals into the Company's offices and facilities.
- Administratively processing obligations undertaken by the Company with its customers upon acquisition of the Company's services and products.
- Controlling access to the Company's offices and implementing security measures, including the establishment of video-monitored areas.
- Evaluating service quality, conducting market research on consumption habits, and performing statistical analyses for internal purposes.
- Carrying out internal or external audit processes in connection with the Company's commercial activities.
- Responding to inquiries, requests, complaints, and claims submitted by data subjects, as well as to regulatory bodies and other authorities that, by law, are entitled to receive personal data.
- Transferring collected information to different departments within the Company and to affiliated companies when necessary for operational purposes.
- Submitting reports to regulatory and governmental authorities when required.

5.3.6. Administrative Management and Shareholders

The Company collects and stores its shareholders' personal data in a database that the Company classifies as confidential. This information will only be disclosed with the express authorization of the data subject or when required by a competent authority.

The purposes for which shareholders' personal data is processed include:

- Enabling the exercise of rights and obligations arising from shareholder status.
- Sending invitations to events organized by the Company.
- Issuing certifications related to the data subject's relationship with the Company.

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- Ensuring compliance with the provisions of the Commercial Code and any other applicable regulations.
- Convening or inviting shareholders to attend the various corporate meetings required in their capacity as shareholders.

In all cases, personal data will not be processed beyond the duration of the company's existence, plus any additional period required by applicable legal or contractual circumstances.

5.4 Rights Related to Data Processing

5.4.1. Rights of Data Subjects

In accordance with the regulations governing personal data processing, data subjects have the following rights:

- To know, update, and correct their personal data held by the Company.
- To request proof of the authorization granted to the Company.
- To be informed by the Company, upon request, of how their personal data has been used.
- To file complaints with the relevant authority for violations of applicable personal data regulations, once the inquiry or claims process with the Company has been exhausted.
- To revoke authorization and/or request the deletion of their data when the Company's processing fails to respect the applicable constitutional and legal principles, rights, and guarantees.
- To access their personal data that has been subject to processing, free of charge.

These rights may be exercised by:

- The data subject themselves;
- Their legal heirs, provided they can demonstrate such status;
- The data subject's legal representative or attorney-in-fact, upon accreditation of the representation or power of attorney;
- A third party acting on behalf of or for the benefit of the Data Subject.

5.4.2. Rights of Children and Adolescents

All personal data of children and adolescents shall be subject to special protection by the Company and shall be processed in accordance with the principles set forth in Law 1581 of 2012, its regulatory decrees, the Political Constitution of Colombia, and the Code of Childhood and Adolescence. In all cases, the processing of such data shall respect their fundamental rights, the prevalence of their rights, and their best interests.

The processing of personal data of children and adolescents shall be exceptional and shall only be carried out when it responds to and respects their best interests and ensures the realization of

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their fundamental rights. In such cases, the authorization shall be granted by their legal representative, in accordance with the applicable legal provisions.

Additionally, for each type of processing, the Company shall promote the adoption of specific terms and conditions establishing the requirements and restrictions applicable to the processing of personal data of children and adolescents, always ensuring the prevalence of their rights and their best interests.

In the absence of specific terms and conditions, the provisions of this Policy and any other applicable legal or regulatory provisions shall apply.

5.5 Duties of the Company as Data Controller

The Company acknowledges that personal data belongs to the individuals to whom it relates, and that only those individuals may make decisions regarding such data. Accordingly, the Company will use collected personal data solely for the purposes for which it is duly authorized, and will at all times comply with the applicable personal data protection regulations. In this regard, the Company undertakes to fulfill the following duties:

- Guarantee the data subject, at all times, the full and effective exercise of their rights;
- Request and retain a copy of the authorization granted by the data subject;
- Properly inform the data subject of the purpose of the data collection and the rights they hold by virtue of the authorization granted;
- Store information under the necessary security conditions to prevent its alteration, loss, unauthorized access, or fraudulent use;
- Ensure that the information provided to the data processor is truthful, complete, accurate, current, verifiable, and understandable;
- Keep information up to date by promptly notifying the data processor of any changes to previously provided data, and taking all other necessary measures to ensure that the information remains current;
- Correct information when it is inaccurate and notify the data processor accordingly;
- Provide the data processor only with data whose processing has been previously authorized;
- At all times, require the data processor to respect the security and privacy conditions applicable to the data subject's information;
- Process inquiries and claims submitted by data subjects.

5.6 Authorization and Consent of the Data Subject

5.6.1. Methods and Means of Obtaining Authorization

Authorization for the processing of data subjects' personal data, across the various scenarios described in this policy, will be obtained through privacy notices made available to data subjects at each of the channels or data collection points associated with the Company's operations.

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The privacy notice, which is made available to the data subject before or at the time of data collection, is the means by which the data subject is informed of all matters related to the applicable data processing policies, how to access them, their rights, the purposes for which their data has been collected, and the channels available for exercising those rights.

In all cases, the authorization granted by the data subject for data processing must be given expressly. Such authorization may be provided in writing, verbally, or through unequivocal conduct that clearly indicates the data subject's consent.

5.6.2. Proof of Authorization

The proof of authorization for personal data processing will depend on the channel or data collection point used. As such, the form of proof will correspond to the mechanism through which authorization was obtained — for example, written forms, records of acceptance through audiovisual or audio recording methods, or acceptance via checkboxes in online forms, among others.

5.7 Procedures for Access, Consultation, Correction, and Updating of Personal Data

Data subjects whose personal data is processed by the Company have the right to access their personal data and the details of such processing, to correct or update it if inaccurate, to request its deletion when it is deemed excessive or unnecessary for the purposes that justified its collection, or to object to its processing for specific purposes.

5.7.1. Inquiries

Data subjects may submit inquiries regarding their personal data held in any of the Company's databases. The Company guarantees the right to inquiry and will process the following types of requests in a timely manner:

- Access to personal information;
- Proof or confirmation of the authorization granted by the data subject;
- Inquiry regarding the use of personal information.

Inquiries must be submitted through the available channels and following the procedure described below:

- At any time and free of charge, the data subject or their representative may submit inquiries regarding personal data that is subject to processing by the Company. In all cases, the identity of the applicant and their authority to submit the inquiry must be verified.
- When the inquiry is submitted by a person other than the data subject, the request must include the following information: the data subject's name and a physical or email address to which the response can be sent, along with documents verifying the applicant's identity, their status as legal representative, and their relationship to the data subject.

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- A description of the specific data over which the right of inquiry is being exercised.
- A clear and detailed description of the inquiry.

The Company will address inquiries within the timeframes established by the applicable local regulations.

5.7.2. Claims

Data subjects may request the correction or update of their personal information, the deletion of their data, or the partial or total revocation of the authorization granted to the Company by submitting a claim, which will be processed according to the following procedure:

- Claims may be submitted at any time, free of charge, by the data subject or their representative, following verification of their identity or legal authority to act.
- The claim must include, at minimum, the data subject's name and identification document, along with documents demonstrating the legitimacy of any representation. The claim must include a clear and precise description of the facts giving rise to it.
- Where necessary, supporting documentation must be provided.

The Company will address claims within the timeframes established by the applicable local regulations of the relevant country.

5.7.3. Service Channels and Responsible Department

The following channels have been established to allow data subjects to exercise their rights by submitting the corresponding request:

- Email: info@mastercol.co

These channels may be used by data subjects or by third parties legally authorized to act on their behalf for the purpose of exercising their rights.

The department responsible for ensuring compliance with this policy is the Administrative Coordination department.

5.8 Personal Data Processing Program and Accountability Principle

To fully comply with the personal data processing framework, the Company will identify its information assets and maintain an up-to-date record of the data lifecycle, as follows:

- Identification of the activities or processes that initiate or capture personal data subject to processing.

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- Identification of data collection channels and sources, specifying the type of information collected, the means of collection, and the purpose.
- Identification of databases and information repositories where personal data is stored, specifying whether processing is carried out through physical or automated means.
- Identification of users or departments within the Company that have access to databases containing personal data, including the identification of any relationships with third-party partners.
- Mechanisms for the disposal or deletion of personal data.

These elements form the essential foundation of the data lifecycle and will serve as the starting point for determining any legal, technical, and organizational coverage that enables the Company to promote the proper handling of personal data.

Each department within the Company is the owner of the information assets it manages, and must fully comply with the legal provisions governing this matter.

5.8.1. Third-Party Relationships

The Company will seek to maintain employment and commercial relationships with third parties that demonstrate adequate compliance with the regulations and guidelines on personal data protection and processing.

Accordingly, the Company may request relevant information from third parties to verify their compliance with the provisions set forth in this policy and applicable regulations.

The Company reserves the right to periodically or on an as-needed basis monitor third-party partners' compliance with the legal and contractual requirements related to personal data protection. For this purpose, the Company may request supporting documentation or evidence of compliance and apply any measures it deems reasonable for verification purposes.

In the event that a third party with an active contractual or conventional relationship fails to comply with this policy, both parties shall develop a compliance plan to meet the requirements established by applicable law.

5.9 International Transfer and Transmission of Personal Data

The Company may carry out international transmissions of personal data through various management software platforms whose servers are located outside Colombian territory, for the purpose of managing all internal business processes. In all cases, in addition to obtaining the express and unequivocal authorization of the data subject, the Company will ensure that such

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transmissions provide adequate levels of data protection and comply with the requirements established in Colombia under the Habeas Data framework.

When the Company decides to carry out an international transfer of personal data beyond what is described above, it may do so without the data subjects' authorization, provided it guarantees the security of the information, confidentiality, and compliance with the conditions governing the scope of data processing, in accordance with Article 10 of Law 1581 of 2012.

6. DATABASE RETENTION PERIOD

Personal data under the Company's control will be retained for as long as required by the purpose of the processing and/or for the period necessary to fulfill any applicable legal or contractual obligation.

7. POLICY MODIFICATIONS

MASTERCOL TRADING S.A.S. reserves the right to modify this Personal Data Processing Policy at any time, and will promptly communicate any such changes to all individuals affected by the policy.

Version Control / Change History

Version	Date	Description of Change	Responsible
1.0	02/15/2023	Initial policy creation	Natalia Mejía Jaramillo
1.1	03/30/2026	Information update	Sandra Liliana Farfán