



China Three Gorges Latam

DATA PROCESSING POLICY

CTGL-LC-PO-007

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Version 1
10-25-2024

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Chapter1 General provisions

1. Introduction

For CTG Colombia Holding S.A.S. (hereinafter referred to as “CTG Colombia”), the security, privacy, and confidentiality of personal information are of utmost importance. Aware of our responsibility in the processing of personal data, we have developed this data processing policy, which is mandatory for all individuals or entities handling personal data registered in CTG Colombia’s databases. The purpose of this policy is to provide the necessary guidelines to ensure compliance with legal obligations regarding the protection of personal data.

CTG Colombia informs all stakeholders that personal data obtained in connection with any operations requested or entered with us will be processed in accordance with the principles and duties defined in Law 1581 of 2012, Decree 1377 of 2013 (compiled in Decree 1074 of 2015), and other relevant regulations on this subject.

2. Identification of the Data Controller

- **Company Name:** CTG Colombia Holding S.A.S.
- **Tax Identification Number (NIT):** 901447638 – 6
- **Phone:** 7560364
- **Address:** Carrera 11 77 A 49 OF 601, Bogotá, Colombia
- **Email:** habeasdata@ctglatam.com

Chapter2 Definitions

- **Authorization:** Prior, express, and informed consent of the data subject for the processing of personal data.
- **Personal data:** Any data and/or information that identifies or makes a physical person identifiable. These may include numerical, alphabetical, graphical, visual, biometric, auditory, profile-related data, or of any other kind.
- **Data processor:** The individual or legal entity, whether public or private, that processes personal data on behalf of the data controller.
- **Data Controller:** A natural or legal person, whether public or private, who, individually or in association with others, decides on the database and/or the processing of the data.
- **Habeas Data:** The fundamental right of every individual to know, update, correct, and/or delete the personal information and data collected and/or processed about them in public or private databases, as provided by law and applicable regulations.
- **Principles for data processing:** These are the fundamental rules, legal and/or jurisprudential, that guide and inspire the processing of personal data, determining actions and criteria to resolve potential conflicts between the right to privacy, habeas data, and personal data protection, and the right to information.

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- **Data subject:** The individual whose data is subject to processing. For legal entities, this right extends to the protection of the name as a constitutionally protected fundamental right.
- **International transfer of personal data:** Occurs when the data controller and/or data processor, located in Colombia, sends personal information to a recipient who, in turn, acts as a data controller and is located inside or outside the country.
- **International transmission of personal data:** The processing of personal data involving its communication within or outside the territory of the Republic of Colombia, for the purpose of processing by a data processor on behalf of the data controller.
- **Data processing:** Any operation or set of operations and technical procedures, automated or not, performed on personal data, such as collection, recording, storage, conservation, use, circulation, modification, blocking, deletion, among others.

Chapter3 General Applicable Principles

1. Informed consent or principle of freedom

The processing of personal data can only be carried out with the prior, express, and informed consent of the data subject.

Personal data cannot be obtained or disclosed without prior authorization unless a legal or judicial mandate waives this requirement.

2. Principle of legality

The processing of personal data is a regulated activity under Law 1581 of 2012, and the provisions of this Law and other related regulations are binding.

3. Principle of data purpose

The processing of personal data must serve a legitimate purpose in accordance with the Constitution and the Law, and this purpose must be clearly and precisely communicated to the data subject to obtain their consent.

4. Principle of accuracy or data quality

CTG Colombia will ensure that the information collected is truthful, complete, accurate, updated, verifiable, and understandable.

5. Principle of transparency

The processing of personal data must guarantee the data subject's right to obtain information from the data controller or data processor, at any time and without restrictions, regarding the existence of data concerning them.

6. Principle of data relevance

The personal data collected by CTG Colombia must be adequate, relevant, and not excessive in relation to the purpose of the processing and/or the database. The collection of personal data disproportionate to the intended purpose is prohibited

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7. Principle of restricted access and circulation

Data processing is subject to the limitations derived from the nature of the personal data and the provisions of Law 1581 of 2012, its regulations, and the Constitution. Personal data may only be used for the purposes disclosed to the data subject and cannot be transferred or communicated to third parties. Personal data, except for public information, may not be available on the Internet or other mass communication media unless access is technically controlled to provide restricted knowledge only to the data subjects or authorized third parties

8. Principle of data security

The personal data processed by the data controller or data processor must be handled with the necessary technical, human, and administrative measures to ensure the security of the records, preventing unauthorized or fraudulent alteration, loss, consultation, use, or access

9. Principle of data temporality

CTG Colombia may only process personal data for the time that is reasonable and necessary, based on the purposes that justified the processing, considering applicable regulations and the administrative, accounting, tax, legal, and historical aspects of the information. Once the purpose for which the personal data was collected or processed is fulfilled, CTG Colombia must cease its use and adopt appropriate security measures unless a legal or judicial mandate requires longer retention.

10. Principle of confidentiality

CTG Colombia and all individuals involved in the processing of personal data that is not public must maintain the confidentiality of the information, even after their relationship with any activities related to the processing has ended. Data may only be disclosed or communicated as required by law. CTG Colombia will implement data protection clauses in its contractual relationships in this regard.

11. Special protection of sensitive data

CTG Colombia will only collect sensitive personal data when it is necessary and relevant for the development of its corporate purpose. In each case, it must obtain the express authorization of the data subject, who will be informed about the type of sensitive data to be collected, the purpose of its processing, and the voluntary nature of the response to questions regarding this type of data. Sensitive personal information that may be obtained from a recruitment process or by any other means will be protected through high security measures.

12. Principle of demonstrated responsibility

When collecting and processing personal data, CTG Colombia will implement appropriate and effective measures to comply with the obligations established by applicable law.

Chapter4 Data Processing and Purposes

CTG Colombia acknowledges that the Data Subject has the right to expect reasonable privacy, while also recognizing their responsibilities, rights, and obligations with the Company. Based on the relationship established between CTG Colombia and the Data Subject, we inform that the Personal

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Data collected, used, updated, circulated, transmitted, transferred, deleted, and, in general, any form of Processing, will be conducted according to the following purposes, which will be previously communicated to the Data Subject, in line with the development of its corporate purpose and the ordinary course of its commercial activities.

1. General Purposes

The purposes listed below will apply to all Data Subjects who have previously provided explicit and informed consent for the Processing of their Personal Data:

- The registration of personal information in CTG Colombia systems.
- The payment of contractual obligations.
- Transfer of Personal Data to CTG Colombia parent companies and/or affiliates, including direct and indirect shareholders.
- Transmission of Personal Data to third parties responsible for payroll management, accounting, and other outsourcing companies with which CTG Colombia maintains a business relationship.
- Transfer and/or transmission of Personal Data for storage on external or internal servers of CTG Colombia located abroad.
- The provision of information to government or judicial entities upon their explicit request.
- Support in internal or external audits, both national and international.
- The collection of data to comply with CTG Colombia obligations as a Data Controller.
- Notification of significant changes in the Policy adopted by CTG Colombia.
- Establishment and management of pre-contractual, contractual, commercial, labour, civil, and any other relationship arising from the fulfilment of legal or contractual obligations assigned to CTG Colombia.
- Responding to requests, inquiries, complaints, and/or claims made by Data Subjects through any of the channels provided by the Controller for this purpose.
- Sending relevant information derived from the relationship with the Controller.
- Any other purpose arising from the relationship between the Data Subject and CTG Colombia or the authorization granted by the Data Subject.
- Control and prevention of fraud and money laundering, including but not limited to consultation of restrictive lists and all necessary information required for SAGRILAFT.

2. Employees

CTG Colombia will use its employees' Personal Data according to the following purposes:

- Incorporate their Personal Data into the employment contract, amendments, and related documents necessary for managing the employment relationship and the obligations derived from it that are the responsibility of CTG Colombia as the Data Controller.
- Develop proper management of the employment relationship linking the Data Subject to CTG Colombia.
- Maintain up-to-date records in CTG Colombia active and historical employee files.
- Send internal communications related or unrelated to their employment.

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- Manage Personal Data to comply with CTG Colombia employer obligations, such as processing registrations required by law, including social security, family compensation funds, and related matters.
- Manage the Personal Data of the Data Subject and their family members to process registrations with health promotion entities (EPS), occupational risk administrators (ARL), and other entities necessary to fulfil CTG Colombia employer obligations.
- Respond to employee requests for certificates, letters, and other documents requested from CTG Colombia due to the employment relationship.
- Manage Personal Data for the proper assignment of work tools (including IT tools like email, computers, mobile devices, database access, etc.).
- Manage Personal Data to ensure proper implementation of the Internal Labor Regulations, including disciplinary processes and pertinent investigations.
- Administer Personal Data to ensure correct payroll payments, including handling authorized deductions for third-party payments and generating related reports.

3. Providers and contractors

CTG Colombia will use the Personal Data of suppliers and/or contractors who are natural persons, as well as the personnel of suppliers and/or contractors who are legal entities, for the following purposes:

- Manage the contractual relationship properly.
- Collect, register, and update Personal Data to inform, communicate, organize, control, handle, and certify activities related to the supplier's or third party's relationship with CTG Colombia and related procedures.
- Manage Personal Data to process invoices and payments presented to CTG Colombia and manage collections under its responsibility.
- Consult and report financial information to credit bureaus legally established in Colombia, under Law 1266 of 2008.
- Evaluate services offered or provided by suppliers and/or contractors.
- Fulfill any other legal obligation that CTG Colombia is responsible for.
- Analyze financial, technical, and other aspects to assess a supplier's capacity to fulfill their obligations.
- Fulfill obligations arising from the commercial relationship with the supplier or contractor.
- Provide assistance and/or general or commercial information to suppliers or contractors.
- Develop and implement selection, evaluation, response, request for information, quotation requests, proposal preparation, and contract award processes.
- Evaluate the quality of products and services offered or provided to CTG Colombia.
- Use, when necessary, the supplier's employees' Personal Data to establish access controls to CTG Colombia physical or digital infrastructure.
- Administer Personal Data to process payments to suppliers, including the management of bank account numbers for payment processing.
- Provide or share information with competent authorities upon request, or during contractual disputes.
- Transfer information to administrative authorities as required in the performance of their duties, to fulfill CTG Colombia legal obligations.

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- CTG Colombia understands that the Personal Data of the supplier or contractor and those of any third parties provided by the supplier or contractor, such as authorized workers to carry out the entrusted management or service, references, and commercial certifications, have the authorization of the respective Data Subjects to be delivered and processed according to the purposes outlined in this Policy, and that they have been informed of the content of this Policy prior to granting their authorization.

Chapter5 Rights of the Personal Data Holders

The holders of personal data contained in CTG Colombia databases have the following rights, in compliance with the fundamental guarantees enshrined in the Political Constitution and the law.

The exercise of "Habeas Data," expressed through these rights, is a personal prerogative and is primarily exercised by the data holder, except for legal exceptions.

1. Right of Access

The Data Subject will have the full right to obtain information regarding their personal data held by CTG Colombia, whether partial or complete, its purpose, the use that has been given to their personal data, the location of the databases containing their personal data, and any communications and/or transfers made regarding them, whether authorized or not. The Data Subject may consult their personal data free of charge: (i) at least once every calendar month, and (ii) each time there are substantial modifications to this policy that warrant new inquiries.

2. Right to Update, Rectify, and Cancel

The data may be updated when there is a change, rectified if inaccurate, incomplete, or non-existent, or cancelled if it is excessive, irrelevant, or the treatment violates the law. This applies unless legal exceptions require otherwise, to ensure the data's purpose is fulfilled.

3. Right to Revoke

The data holder has the right to revoke the consent or authorization granted to CTG Colombia for the specific treatment of their personal data.

4. Right to suppression

The data holder can request the suppression of their data if the treatment does not respect constitutional and legal principles, rights, and guarantees, except in cases provided by law

5. Right to Submit Complaints and Claims

The data holder has the right to file complaints and claims with the Superintendence of Industry and Commerce or any competent authority for the protection of their personal data.

6. Right of Opposition

The data holder may oppose the processing of their personal data, except in cases where legal provisions or superior general interests override this right.

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7. Request Proof of Authorization

The data subject has the right to request CTG proof of the authorization granted for the processing of their personal data, except when the authorization is not required for processing, in accordance with the law.

Chapter 6 Department in Charge of Handling Inquiries

The department responsible for addressing inquiries, requests, and complaints, and generally overseeing compliance with applicable law within CTG Colombia is the Legal Department. Data subjects may exercise their rights to know, update, rectify, delete information, and revoke or obtain a copy of the authorization through verbal communication, submitting a written request, and/or sending an email via any of the following contact channels:

- **Phone:** 7560364
- **Address:** Carrera 11 77 A 49 OF 601, Bogotá, Colombia
- **Email:** habeasdata@ctglatam.com

Chapter7 Procedure for Consultations and Claims

1. Consultation

Data holders who wish to make inquiries should know that CTG Colombia, as the data controller, will provide them with all the information contained in the individual record or linked to their identification. The consultation will be processed through CTG Colombia authorized channels and will be answered within a maximum of ten (10) business days from the date of receipt. If it is not possible to respond within this time frame, the data holder will be informed of the reasons for the delay, and the response will be provided within an additional five (5) business days.

2. Claims

The data subject who believes that the information contained in a CTG Colombia Database should be corrected, updated, or deleted, or who notices a possible breach of applicable legal obligations, may file a claim with CTG Colombia or the Data Processor, in accordance with the following rules:

- The claim must be submitted through a request addressed to the Data Controller or Processor, identifying the data subject, describing the facts giving rise to the claim, and providing the address, along with any supporting documents the data subject wishes to present.
- If the claim is incomplete, the data subject will be asked to correct the deficiencies within five (5) business days following receipt of the claim. If the required information is not provided within two (2) months, it will be understood that the claimant has withdrawn the claim.
- If the person receiving the claim is not competent to resolve it, they must forward it to the appropriate party within a maximum of two (2) business days and inform the claimant of the situation.
- Once the complete claim has been received, a note will be added to the Database stating "claim in process" and the reasons for the claim. This note must remain until the claim is fully resolved.

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- The claim must be resolved within a maximum of fifteen (15) business days from the day following the receipt of the claim. If it is not possible to resolve the claim within this period, the claimant will be informed of the reasons for the delay and given a new resolution date, which must not exceed eight (8) additional business days after the initial period.

Chapter8 Security and Confidentiality

In accordance with the security principle set forth in Law 1581 of 2012, CTG Colombia has adopted and incorporated the necessary and appropriate technical, human, and administrative measures into its processes to ensure the security of records containing personal information, preventing their alteration, loss, unauthorized or fraudulent consultation, use, or access. Personnel involved in the processing of personal data must follow the protocols established by CTG Colombia to guarantee the security of the information. These measures are in line with the current state of technology, the type and nature of the data stored in the databases, and the risks to which they are exposed.

Personal data collected by CTG Colombia through any format, contract, physical or electronic communication will be treated with the utmost confidentiality, ensuring the appropriate secrecy is maintained. CTG COLOMBIA will guarantee proper storage and will take the necessary measures to prevent alteration, loss, unauthorized processing, or access, in accordance with the applicable law.

Chapter 8 Data Retention Period

CTG COLOMBIA may process personal data for as long as is reasonable and necessary, in accordance with the company's document retention schedules. Additionally, data will remain valid based on the purposes that justified their processing, following the applicable regulations concerning the matter and considering the administrative, accounting, fiscal, legal, and historical aspects of the information.

Once the purpose for the processing has been fulfilled, personal data will be deleted from the company's files unless a legal or contractual obligation requires their retention in the databases.

Chapter 9 Supplementary Provisions

This policy has been reviewed by the legal department and was ultimately approved by the Executive Committee.

It will be disseminated, published, and updated by the department responsible for its communication and enforcement.

This policy will come into effect from the version of the document and will be shared with data subjects in a timely manner whenever substantial changes are made, in accordance with Article 5 of Decree 1377 of 2013.