

## PERSONAL DATA TREATMENT AND HANDLING POLICY

### ELITE MEDICAL COLOMBIA S.A.S

NIT. 901809216-6

In accordance with the provisions of Law 1581 of 2012, and other corresponding regulations, modifying and/or complementary, ELITE MEDICAL COLOMBIA S.A.S, identified with NIT. 901809216-6 domiciled in Medellín, establishes the Treatment and Management Policy of Personal Data in accordance with the aforementioned legal provisions, the purpose of which is to develop the right that all people have to know, update, rectify and eliminate the information that is held or has been collected from them and that is in databases.

By virtue of the aforementioned right, ELITE MEDICAL COLOMBIA S.A.S, states that the data that may be collected will be those that are required for the relationship that is formed between the person responsible and the owner, therefore, the data provided, stored and treated will be the following, however this list is declarative but not exhaustive:

- **Clients/users:** company name, full name, ID, citizenship card, correspondence address, telephone, cell phone, email. **Employees:** names and surnames, marital status, landline, cell phone, email, citizenship ID number, date of birth, date and place of issue of the citizenship card, nationality, age, sex, work experience, positions performed, dates of entry and withdrawal, educational level, academic history, social security entities where you are affiliated, personal data who wish to affiliate as beneficiaries to the social security system, information on bank account number and entity where you have it, information on the state of health as a result of admission, periodic and withdrawal.
- **Suppliers and contractors:** Full name, company name, citizenship ID, landline, cell phone, email, bank account number information and entity where you have it.

In accordance with the above, ELITE MEDICAL COLOMBIA S.A.S, clearly and expressly states that the information that will be collected and provided in each of the databases it manages will be used and processed for the pertinent purposes of the relationship that is formed between the person responsible and the owner, having as main purposes the following:

- **Clients:** provision of the contracted service, completion of satisfaction surveys, billing procedures, pre-legal and legal portfolio collection procedures, product delivery, sending promotional information, launching new products, account statement information.
- **Client Contacts:** Billing procedures, portfolio collection procedures and administrative and accounting procedures, portfolio collection procedures in the pre-stage legal and legal stages.
- **Supplier Contacts:** billing procedures, payment procedure invoices, administrative and accounting procedures and procedures, order management.
- **Employees:** Verify work references and work experience, affiliations to social security entities, settlement and payment of social security contributions, sending and reporting news to social security entities, liquidation and payroll and social benefits,

disciplinary processes. The information contained in the admission, periodic and retirement medical examinations will be used solely and exclusively for cases of health emergencies of the employee due to work-related accident issues and for statistical purposes to everything related to the SGSST. The fingerprint taken is used solely and exclusively for control during work hours and for no reason is it supplied or shared by any natural or legal person.

- **Suppliers and contractors:** paying invoices and placing orders.

In any case, our facilities and offices have a surveillance system, which is used for security issues and employee schedule control, so both biometric data may be recorded and monitored by us. However, these will only be processed exclusively for security reasons and for no reason will be shared with third parties, except when required by competent authority. For the reasons stated above, it is noted that according to the article 6 of decree 1377 of 2013, our clients, employees, suppliers and Visitors are not required to authorize the processing of this data.

In accordance with the above, and in accordance with the provisions of Law 1581 of 2012, The owners of personal data have the following rights:

- Know, update and rectify your personal data in front of the person responsible for the Treatment or Treatment Managers.
- Request proof of the authorization granted to the Data Controller except when it is expressly accepted as a requirement for the Treatment, in accordance with the provisions of article 10 of law 1581 of 2012.
- Be informed by the Person Responsible for Treatment or the Person in Charge of the Treatment, upon request, regarding the use given for your personal data.
- Present complaints to the Superintendency of Industry and Commerce for violations of the provisions of Law 1581 of 2012 and the other regulations that modify, add or complement.
- Revoke the authorization and/or request the deletion of the data when in the Treatment constitutional and legal principles, rights and guarantees are not respected. Access free of charge to your personal data that has been subject to Treatment.

In order for the owners of personal and biometric data to be able to exercise their rights to update, rectify and delete the data and information that rests in our databases, they must send an email to [info@elitemedicalholidays.com](mailto:info@elitemedicalholidays.com); requesting the update, rectification or deletion of the data. The request or communication that is sent by the owner of the data must contain at least the following:

- Identification of the owner of the personal data (full name, company name, citizenship card or Nit as the case may be).
- Description of the facts that give rise to the claim.

- The address in which the response will be given
- Attach the documents that you want to use as evidence.

To respond to the claim or request made by the owner, ELITE MEDICAL COLOMBIA S.A.S, has a maximum term of fifteen (15) business days, and must follow the following procedure:

- If the claim is incomplete, the interested party will be required within five (5) days following receipt of the claim to correct the deficiencies.
- Two (2) months have elapsed from the date of the request, without the applicant presenting the required information, it will be understood that he has withdrawn from the claim.
- In the event that the person receiving the claim is not competent to resolve it, he or she will transfer to whoever corresponds within a maximum period of two (2) business days and will inform the interested party of the situation.
- Once the complete claim is received, a legend will be included in the database that says "claim in process" and the reason for it, in a period of no more than two (2) business days. Said legend must be maintained until the claim is decided.
- The maximum term to address the claim will be fifteen (15) business days counted from the day following the date of complete receipt. When it is not possible to address the claim within said term, the interested party will provide the reasons for the delay and the date on which their claim will be addressed, which in no case may exceed eight (8) business days following the expiration of the first term.

This policy has been in force since October 1, 2020 and the databases will have an indefinite validity, according to the duration of the relationship with each of the data owners. This policy for the management and treatment of Personal data can be seen on the [WWW.ELITMEDICALHOLIDAYS.COM](http://WWW.ELITMEDICALHOLIDAYS.COM) website.