

PERSONAL DATA PROCESSING POLICY

1 PURPOSE

This policy (the "Policy") aims to establish the rules applicable to the processing of personal data collected, stored, used, transmitted, transferred, and/or deleted by **UHB | Estudio de Estrategia** ("UHB"), in compliance with Law 1581 of 2012, Decree 1074 of 2015, and other applicable Colombian regulations.

2 DEFINITIONS

Personal Data: Any information linked to or that may be associated with one or more identified or identifiable natural persons.

Sensitive Data: Information that affects the data subject's privacy or whose misuse may lead to discrimination.

Authorization: Prior, express, and informed consent of the data subject for the processing of their personal data.

Data Subject: Natural person whose personal data is subject to processing.

Data Controller: Entity that decides on the database and/or the processing of data.

Data Processor: Entity that processes personal data on behalf of the controller.

Transfer: Sending data to another data controller.

Transmission: Processing carried out by a processor on behalf of the controller.

3 SCOPE OF APPLICATION

This Policy applies to all personal data processed by UHB, as controller and/or processor, in the course of its operations as a legal and strategic advisory firm.

4 PRINCIPLES

Data processing is carried out in accordance with the principles of legality, purpose, freedom, truthfulness, transparency, restricted access and circulation, security, and confidentiality.

5 AUTORIZATIONS

UHB obtains authorizations through physical, digital, or verbal means, provided that subsequent consultation is possible. The authorization will be stored in compliance with applicable laws.

6 DATA PROCESSING AND CATEGORIES

Depending on the relationship with the data subject, UHB may process the following types of personal data:

- Identification and contact data: name, ID number, address, email, phone number.
- Professional and employment data: academic background, professional experience, occupation, position.
- Commercial and financial data: billing data, bank accounts, payment history.
- Sensitive data: only when legally required or with the data subject's explicit consent.
- Browsing and analytics data: collected through cookies and similar technologies.

6.1 General purposes:

- Execute contractual, pre-contractual, or commercial relationships.
- Manage institutional communications.
- Respond to inquiries and conduct quality follow-ups.
- Comply with legal, contractual, and regulatory obligations.
- Manage contacts, providers, clients, and internal processes.

6.2 Purposes by data subject type:

- Clients: legal management, monitoring, billing, and request handling.
- Providers: verification of requirements and payments.
- Employees/Collaborators: labor administration and regulatory compliance.
- Website users: analytics, preferences, and functionality.

7 SENSITIVE DATA AND MINORS

UHB does not collect sensitive data or data from minors unless required by law. In such cases, the voluntary nature of providing this information and its specific purpose will be communicated.

8 DATA TRANSFERS

UHB may transfer and/or transmit personal data to third-party processors or controllers located in Colombia or abroad, when necessary for authorized purposes, contractual execution, or legal compliance.

In particular, data may be shared with:

- Strategic partners or vendors acting on behalf of UHB or with a commercial/legal relationship.
- Administrative or judicial authorities when required by law.
- Processors providing services to UHB (e.g., IT, accounting, legal, administrative).

All transfers or transmissions will be made under contractual agreements that ensure security, confidentiality, and compliance with Colombian data protection law.

For international transfers, UHB will verify that the recipient country offers adequate protection, or else obtain express consent or use standard contractual clauses.

9 COOKIES AND SIMILAR TECHNOLOGIES

UHB's website may use cookies to enhance browsing experience, deliver personalized services, and perform statistical and traffic analysis. Users may configure their browser to reject cookies.

10 DATA SUBJECT RIGHTS

Data subjects may exercise their rights freely and personally, except as otherwise provided by law. These include the right to:

- Access, update, correct, or delete their personal data.
- Revoke their authorization.
- Request proof of the authorization granted.
- File complaints with the Superintendence of Industry and Commerce (SIC).

11 INQUIRIES AND CLAIMS

Requests may be sent to contacto@estudiouhb.com or via channels designated by UHB. The request must include at least:

- Full name and identification of the data subject.
- Clear description of the request or claim.
- Contact information (email and/or physical address).
- Supporting documents (if applicable).

11.1 Inquiries

Inquiries will be answered within ten (10) business days of receipt.

If an extension is needed, the data subject will be notified with an explanation and a new deadline not exceeding five (5) additional business days.

11.2 Claims

Claims will be addressed within fifteen (15) business days. If incomplete, UHB will request corrections within five (5) business days. If the requester fails to respond within two (2) months, the claim will be considered withdrawn.

If UHB cannot resolve the claim within the initial timeframe, it will inform the requester and provide a new date (no more than eight (8) additional business days).

11.3 Data deletion

Data subjects may request the deletion of their data when:

- It is not being processed in accordance with applicable law.
- It is no longer necessary or relevant for the original purpose.
- The maximum retention period has passed.

Requests will not proceed if there is a legal or contractual duty to retain the data. In such cases, UHB will explain the legal grounds for retention.

Deletion may consist of complete removal or blocking, retaining the data only when legally required.

12 VALIDITY AND MODIFICATIONS

This Policy is effective as of January 1, 2025, and will remain valid while UHB processes personal data.

UHB may update this Policy to reflect legal or operational changes or new processing purposes. Substantial changes will be notified via efficient channels such as www.estudiouhb.com or email.

Substantial changes include: (i) identity of the controller; (ii) purposes of processing; (iii) data subject rights; and (iv) communication channels.

For more information or questions, please contact us at contacto@estudiouhb.com.