

DATA PROTECTION POLICY

CODE: PO-JU-01

PAGE: 1 VERSION: 01

OBJECTIVE

This policy is issued in compliance with the Law 1581 of 2012 and the Sole Regulatory Decree 1074 of 2015, on the regime of protection of personal data and expresses the commitment of NativApps SAS with the proper treatment of personal data, whether under the modality of responsible or in charge, giving strict compliance with the applicable regulations and guaranteeing the rights of the holders of the data.

RESPONSIBLE

Denomination: NativApps SAS

ID: 900.545.138-1

Address: Street 94 No 51b-41 Oficina 607

City: Barranquilla

Email: nativapps@nativapps.com

Phone: (035) 3148468

Responsible department: HHRR

CONDITIONS FOR THE TREATMENT OF PERSONAL DATA

- a) NativApps SAS oversees the processing of Personal Data in his commercial exercise itself and for this purpose does not require the prior, express and informed authorization of the Owner. However, for those cases where NativApps SAS is responsible for the use of the data, a proper authorization through a physical, electronic, data message, Internet, website, or also verbally or by telephone or in any other format must be obtain in order to allows its subsequent consultation. Likewise, NativApps will obtain through means of clear and unequivocal behaviors of the owner that allow concluding in a reasonable manner that the Owner granted his consent for the handling of his Personal Data.
- b) NativApps SAS will request the authorization to the owner of the personal data and will maintain the evidence of it, when the Processing of Personal Data is for a different purpose for which they were initially collected.
- c) As a result, any processing of Personal Data made in NativApps SAS must correspond to the execution of its commercial functions or to the purposes mentioned in the authorization granted by



DATA PROTECTION POLICY

CODE: PO-JU-01

PAGE: 2 VERSION: 01

the owner, when the situation requires it. In particular, the main purposes for the processing of Personal Data that corresponds to investigative and judicial authorities, when requested in the exercise of their functions.

- d) Personal Data subject to treatment must be handled by providing all human and technical measures for its protection, providing the assurance that it cannot be copied, adulterated, deleted, consulted or in any way used without authorization or for fraudulent use.
- e) When any of the tasks of processing Personal Data by the Suppliers, contractors or Managers of the treatment ends, and even after the termination of their contractual relationship with NativApps SAS, they are obligated to maintain the reservation of the information in accordance with the current regulations in the matter.
- f) NativApps SAS will not transfer information related to Personal Data to countries that do not have adequate levels of data protection, in accordance with the standards set by the Superintendence itself.
- g) The owner of the personal data can exercise their rights by submitting inquiries and claims to NativApps SAS, either physically at their headquarters located at Street 94 No 51b-41 Office 607 or by the following email nativapps@nativapps.com; these will be answered following the protocol of attention to requests and complying with what is described in the legislation.
- h) This policy becomes effective since its approval and signature and may be modified at any time. Any modification will be made in compliance with current legal regulations, and they will become effective and will have effect from its publication through the mechanisms provided by NativApps SAS so that the owners know about it and the changes that occur in it.