

1) Personal Data Generalities and Responsibility Identification

All throughout our commercial path, DESCAFECOL S.A.S. has kept in its data bases personal data from its business associates, personnel, strategic allies, etc. Attending in force legislation on this subject and having in mind to offer a better service to our stakeholders, DESCAFECOL S.A.S. displays here all terms and conditions for treating and managing personal data, its Data Treatment and Protection Policy as well as all the procedures it has established to allow personal data owners to exert their rights yielded under the personal data protection legislation.

This Personal Data Treatment and Protection Policy establishes all terms, conditions and objectives under which DESCAFECOL S.A.S. and its linked businesses, perform collection, storage, usage, commercialization, handling, suppression and treatment of data from stakeholders, web portal users, employees, and all those people with who DESCAFECOL has o has had any kind of relationship (who from now on are called "Data Holder").

When the Data Holder accepts DESCAFECOL S.A.S.' terms and conditions, he or she is expressly accepting this Policy and generating an authorization to use his or her personal data according to the following points:

These terms and conditions apply to any personal data registry obtained either person to person, by telephone and/or virtually for his or her bonding to any product, service or benefit offered by DESCAFECOL S.A.S. The Data Holder handles his or her data in a voluntary and freeway and acknowledges having read and expressly accepted these terms and conditions.

On this respect, it is stated that the one responsible for the personal data treatment is DESCAFECOL S.A.S., identified with the Colombian Tax Identification Number 800.045.228-8, with main address Parque Industrial Juanchito, in Manizales, Caldas, web portal www.descafecol.com, Financial and Administrative Area telephone number +57 606 8931200 and electronic mail info@descafecol.com

DESCAFECOL S.A.S. is generally in charge of the treatment and custody of all personal data collected and stored; nevertheless, it reserves its right to delegate on a third entity the mentioned treatment. DESCAFECOL S.A.S. will demand from the entity in charge to attend and implement all suitable policies and procedures to protect personal data and their stringent confidentiality.

Whenever this document mentions DESCAFECOL S.A.S., all linked businesses and those with which it has commercial alliances will be enclosed.

As of today, DESCAFECOL S.A.S. stores all personal data collected in its data bases whose security and access policies are only available to authorized personnel. There are also internal data security procedures and access administration and protocols to avoid any infringement of the information delivered. Nonetheless, DESCAFECOL S.A.S. exonerates itself from third parties illicit manipulations and technical or technological failures outside its protection sphere.

DESCAFECOL S.A.S.' products and services are intended for adults; therefore, this policy and this information are for their exclusive knowledge and usage.

DESCAFECOL S.A.S. has an Internal Handbook for Personal Data Treatment and Protection. Although, we cannot make it public due to its information confidentiality and security. It emphasizes on adopted security types and mechanisms, people responsible, measurements, norms, procedures, rules and standards to guarantee the security level required by Law 1581 of 2012 and Decreto Unico Reglamentario 1074 of 2015,

This Treatment and Protection Policy obliges DESCAFECOL S.A.S. strict accomplishment as the entity responsible of treating your data, as well as any third party acting in the name of the Company or that, not acting in its name, may treat your personal data on DESCAFECOL S.A.S. mandate. The responsible entity as well as any third party are willing to fulfill and respect this policy when accomplishing their functions and/or activities, even after their legal, commercial or

any other kind of binding with DESCAFECOL S.A.S. has ended. Likewise, they must keep strict confidentiality in respect to the data treated.

Persons allowed to supply the protected data, are:

- a) Holders, its successors in title or legal representatives;
- b) Public or administrative entities exerting their legal functions or by judicial order;
- c) Third parties authorized by the holder or by the Law. When the request is made by a person different to the holder who does not demonstrate his representation, it will be considered not received.

2) Information Security

DESCAFECOL S.A.S., is committed to adequately treat its stakeholder's personal data, avoiding any unauthorized access by third parties which would allow them to know, infringe, modify, uncloze and/or destroy the information kept in its data bases (DESCAFECOL S.A.S.'). For this reason, there are information systems security, access, storage and processing protocols, including physical measurement controls to security risk in order to keep safeguarded the stakeholder's information.

Access to all data bases is restricted even to personnel, who are bind to confidentiality and adequate handling of data bases, accomplishing information treatment policy established by law.

3) Personal Data Collection and Storage

DESCAFECOL S.A.S. asks data required to adequately perform its operations with its stakeholders. Sometimes this is sensible information and the stakeholder is entitled to freely and voluntarily supply it or not. Information is stored at a data base owned by DESCAFECOL, entity that has informed its stakeholders about this storage.

DESCAFECOL S.A.S. has carried out available security mechanisms and also has unfold a series of internal documents, activities and procedures to guarantee technical security schemes appropriate functioning. Nevertheless, although adopted due diligence, DESCAFECOL S.A.S. does not make itself responsible for any consequence from improper or fraudulent data base entry by third parties and or for any malfunction due to technical failure.

4) Data Treatment and Protection Activities and Objective

Personal data yield by the holder to DESCAFECOL S.A.S. is required to be collected, stored, used, spread, shared, commercialized, processed and or treated to:

- To adequately provide DESCAFECOL S.A.S. services and or products.
- To be contacted for renewals, and products and services offerings.
- To evaluate products and services quality.

DESCAFECOL S.A.S. is entitled to totally or partially acquire, store, treat, collect, reproduce, translate, adapt, extract, resume, transmit, with or without help of computing, data stored on its digital or physical data bases, either hosted inside or outside Colombia.

5) Data Holder Rights

The data holder is entitled by law to the following rights:

- To know, update and correct his or her personal data before the people responsible or in charge of his or her data treatment.

- To ask for proof of the authorization he or she gave to the people responsible of his or her data treatment, unless it is exempt as a requirement for treatment, according to what article 10 of Law 1581 of 2012 states.
- To be informed by the people responsible or in charge of his or her data treatment, after his or her request, about the use given to his or her personal data.
- To present complains for infractions to the law and all regulations that modify, add or complement it, before the Superintendencia de Industria y Comercio.
- To revoke his or her authorization and/or to ask for the suppression of the data when its treatment did not respect the principles, rights and constitutional and legal grants. Revocation and/or suppression will proceed if it does not constitute one of the exceptions foreseen by the law.
- To Access without any cost his or her personal data that has been object of the treatment.

Furthermore, according to Article 20 of the Decree 1377 of 2013, the following persons can exert the data holder rights:

- The data holder, who must attest his or her identity by the means the responsible party places to his or her disposal.
- His or her successors in title, who should attest this condition.
- His or her representative or attorney, after attesting representation or attorney ship.
- Stipulation in favor to other or for other.

6) About Personal Data Treatment and Protection Authorization

According to Article 5 of Decree 1377 of 2013, by which partially Law 1581 of 2012 is regulated, DESCAFECOL S.A.S. has a procedure to request authorization from the data holder to treat his or her data before collecting them, and to inform him or her about which personal data will be collected as well as all specific data goals for which consent is obtained.

The following is the Privacy Notice in force right now:

"DESCAFEINADORA COLOMBIANA S.A.S., DESCAFECOL S.A.S., informs that: to accomplish Law 1581 of 2012 and what is foreseen in Decree 1377 of 2013, paragraph of Article 10, numeral 3, in order to inform everybody whose personal data are included in our data bases, and having in mind that it is impossible to ask everyone for an individual authorization, we take advantage of the alternative mechanism allowed in the mentioned numeral and states that all its data bases personal data has been collected to develop different procedures directly related to DESCAFECOL's social object. Usage and handling of this personal data is carried out under stringent responsibility standards as the respect for due diligence and the information protection. Data registered in our data bases are, among other, addresses, telephone numbers, e-mail addresses and birthdays. In any case, the data holder can at any moment revoke his or her consent and exert his or her right to suppress from them personal data, as granted by Law 1581 of 2012.

If you want to consult information or ask for your personal data suppression from our data bases, we appreciate you to contact the following address within 30 days of this add publication: Parque Industrial Juanchito, Manizales, Caldas, or by e-mail to info@descafecol.com. If you decide not to do it, after those 30 days, we consider your personal treatment authorized. The above, notwithstanding the data holder right to consult, learn, update or ask for suppression or correction of his or her personal data. For more information, please consult our Data treatment and protection Policy at the link enclosed to the website www.descafecol.com"

In order to accomplish Law 1581 of 2012, Article 9, DESCAFECOL S.A.S. has established mechanisms to obtain authorization from the data holder or whoever is entitled to the data, according to Article 20 of Decree 1377 of 2013. Those mechanisms are predetermined through technical means to easily allow the data holder to express his or her automatized expression. Authorization is understood to accomplish all requirements whenever it is expressed (i) in writing, (ii) orally or (iii) by means of unequivocal conduct from the holder that allows to reasonably conclude that he or she gave the authorization.

According to article 10 of Law 1581 of 2012, data holder authorization is not necessary whenever:

- Information is required by a public or administrative entity performing its legal functions or by legal order;
- Data of public nature;
- Cases of medical or sanitary urgency;
- Information treatment authorized by law for historic, statistical or scientific purposes;
- Data related with people civil registry

7) Modifications to Personal Data Treatment and Protection Policy and Privacy Notice

DESCAFECOL S.A.S. holds its right to modify at any moment and unilaterally its Personal Data Treatment and Protection Policy and/or the Privacy Notice. Any substantial change will be published and announced 15 days in advance through its web page www.descafecol.com. Furthermore, all previous versions will be kept.

If the data holder keeps using the service or does not disassociate after the new policy notification, his or her attitude is considered an acceptance of it.

8) Information Disclosure – Public Data

Personal data holder, by accepting this policy, states that he or she knows that DESCAFECOL S.A.S. can supply this information to linked businesses or to other enterprises linked to the same group and to judicial and administrative government entities which, exerting their functions, may ask for this information. He or she accepts also that data could be object of internal or external audit processes performed by entities in charge of this kind of control, subject to information confidentiality clauses.

Public data is the one that is not semi-private, private or sensitive. Public data are considered for example marital status, profession and trade and the state of merchant or public server. Due to their nature, public data could be contained in records and public documents, gazettes and official newsletters and judicial decisions, among others. Public data may be treated by any person.

9) Query and Complains Attention

Data holders are entitled at any moment to ask DESCAFECOL S.A.S., as personal data responsible, for information about his or her data, and update, correct, include or exclude it from the data base.

To receive queries, complains and claims about personal data treatment, or to make use of their rights as users or customers, DESCAFECOL S.A.S. receives e-mails to info@descafecol.com or in a written statement directed to its Financial and Administrative Director, who has been appointed by the Company as responsible for the attention to this kind of queries, complains and requests, at its main address located in Parque Industrial Juanchito, in Manizales, Caldas, at a schedule from Monday to Friday from 7:30 am to 4:00 pm.

DESCAFECOL S.A.S. places to the data holder disposal free of charges and easily accessed mechanisms to present a data suppression or authorization removal request. Whenever the data holder has a legal or contractual duty to remain at the data base, his or her request to suppress his or her information or the revocation of the authorization will not proceed, according to Article 9 of Decree 1377 of 2013, which partially regulates Law 1581 of 2012,

Data holders may be able to consult free of any charge their personal data: (i) at least once a month and (ii) each time a substantial modification to information treatment policies have been performed, motivating new queries.

DESCAFECOL S.A.S. can only charge the data holder for document mailing, reproducing and certification when queries frequency exceeds once per month. Reproducing expenses cannot be higher than recuperation of the

corresponding material. At the Superintendencia de Industria y Comercio request, DESCAFECOL S.A.S. must submit those expenses support, according to Article 21 of Decree number 1377 of 2013, by which Law 1581 of 2013 is partially ruled.

For queries and claims, DESCAFECOL S.A.S. will answer the data holder according to Law 1581 of 2012: request must contain all required data that applies to the petition right to guarantee opportune and effective response. It also must contain a clear and precise description of the personal data to which the data holder seeks to exert his or her rights.

To be processed, requests must be presented by the data holder or his or her legal representative; therefore, DESCAFECOL S.A.S. has the right to verify by any means the requesting person identity.

Irrespective of the mechanism used to file the queries requests, they have to be solved in a maximum term of ten (10) business days counting from the reception date. When answering the query in this term is not possible, before the ten days of the due date, the requester must be informed, telling him or her the causes for the delay and pointing out the date at which his or her query will be answered, which could not be longer than the five (5) following days to the end of the first deadline.

Requests for data updating, editing or suppressing, must be solved before fifteen (15) business days counting from the next day after the request reception. When answering in this term is not possible, the requester must be informed, before the due date, telling him or her the causes for the delay and pointing out the date at which his or her claim will be answered, which could not be longer than the eight (8) following days to the end of the first deadline.

10) Personal Data Treatment Authorization Validity

Data Holder accepts and acknowledges this authorization is valid from the moment he or she accepted it, or acceptance is presumed and is active as long as DESCAFECOL S.A.S. exerts activities on the field of its social object.

11) Personal Data Treatment Policy Validity

Personal Data Treatment validity starts on November 1st, 2014 and its validity is indefinite. This policy will be kept published at the Company's website.

12) Document Control

Control	Cargo	Dependencia
Documentation	SIG Coordinador	Quality Management
Review	SIG Coordinador	Quality Management
Approval	Quality Director	Quality Management

13) Modification Control

Version (date)	Modification	Performed by	Approved by
Version 1 Nov 2014	Document coignage	Julián Velez Coordinador de Sistemas	Jose Fernando Mejia Coordinador SIG

Version 2 abr 2018	Document review and confirmation, version change.	Julián Velez Coordinador de Sistemas Jose Fernando Mejia Coordinador SIG	Juan Pablo Coppiano Director Financiero
Version 3 ene 2020	Corporative image change. Version updating.	Jose Fernando Mejia Coordinador SIG	Jorge Iván Forero Director de Calidad
Version 4 Jun 2020	Version updating and translation.	Jose Fernando Mejia Coordinador SIG	Jorge Iván Forero Director de Calidad
Version 5 Jun 2022	Version updating.	Jose Fernando Mejia Coordinador SIG	Jorge Iván Forero Director de Calidad
Version 6 Feb 2024	Version review, updating and version change.	Julián Vélez Coordinador de Sistemas César Cuéllar Coordinador del SIG	Jorge Iván Forero Director de Calidad