



## POL- POLITICA DE PROTECCIÓN DE DATOS PERSONALES

POL-003-GC

FECHA 21/04/2023

VERSIÓN 2

# PERSONAL PROTECTION POLICY

## CHAPTER I. GENERAL DISPOSITIONS

### Introduction

Based on Statutory Law 1581 of 2012 “By which general provisions are issued for the protection of personal data” the company: **DESECHABLES MÉDICOS S.A.S**, acronym: **DESMÉDICOS S.A.S**, with main address in the city of Bogotá, dedicated to marketing to wholesale of medical-surgical products, manufacturing, clothing, distribution, import, export and marketing of textiles and clothing of all types of clinical and hospital elements, medical, laboratory surgical, pharmaceutical and healing instruments and equipment; as responsible for the processing of personal data, hereby adopts the policies and procedures manual to guarantee the right that people have to know, update and rectify the information that has been registered about them in databases and/or files that the Company uses and processes.

### I. DEFINITIONS.

- a. **Authorization:** Prior acknowledgment, express and informed consent of the Owner to carry out the Processing of personal data;
- b. **Privacy Notice:** Verbal or written communication generated by the Controller, addressed to the Owner for the Processing of their personal data, through which they are informed about the existence of the information Processing policies that will be applicable to them, the way to access them and the purposes of the Treatment that is intended to be given to personal data.

	<b>POL- POLITICA DE PROTECCIÓN DE DATOS PERSONALES</b>	<b>POL-003-GC</b>	
		FECHA	21/04/2023
		VERSIÓN	2

- c. **Database:** Organized set of personal data that is subject to Processing;
- d. **Personal Data:** Any information linked or that can be associated with one or several specific or determinable natural persons;
- e. **Public Data:** It is data that is not semi-private, private or sensitive. Public data are considered, among others, data relating to the marital status of people, their profession or trade and their status as a merchant or public servant. Due to its nature, public data may be contained, among others, in public records, public documents, official gazettes and bulletins, and duly executed judicial rulings that are not subject to confidentiality.
- f. **Sensitive Data:** Sensitive data is understood to be data that affects the privacy of the Owner or whose improper use may lead to discrimination, such as data that reveals racial or ethnic origin, political orientation, religious or philosophical convictions, membership in unions, social organizations, human rights organizations or that promote the interests of any political party or that guarantee the rights and guarantees of opposition political parties, as well as data related to health, sexual life, and biometric data.
- g. **DESMÉDICOS:** This is the company **DESECHABLES MÉDICOS S.A.S.**, which for this document will be mentioned under its acronym: **DESMÉDICOS S.A.S.**
- h. **Data Processor:** Natural or legal person, public or private, who, by themselves or in association with others, processes personal data on behalf of the Data Controller;
- i. **Responsible for the Management:** Natural or legal person, public or private, who alone or in association with others, decides on the database and/or the Processing of the data;
- j. **Owner:** Natural person whose personal data is the subject of management;



## POL- POLITICA DE PROTECCIÓN DE DATOS PERSONALES

POL-003-GC

FECHA 21/04/2023

VERSIÓN 2

- k. **Transfer:** The transfer of data takes place when the Controller and/or Processor of personal data, located in Colombia, sends the information or personal data to a recipient, who in turn is Responsible for the management and is located inside or outside from the country.
- l. **Transmission:** Processing of personal data that involves the communication of the same within or outside the territory of the Republic of Colombia when its purpose is to carry out a Processing by the Processor on behalf of the Controller.
- m. **Processing:** Any operation or set of operations on personal data, such as collection, storage, use, circulation or deletion.

## II. NORMATIVITY

### A. LEGAL FRAMEWORK

- a. Political Constitution of Colombia, in its article 15.
- b. Law 1581 of 2012 and other laws that modify or regulate it
- c. Regulatory Decree 1377 of 2013.
- d. Decree 090 of 2018
- e. Rulings of the Constitutional Court C-1011 of 2008 and C-748 of 2011
- f. Demonstrated responsibility guide issued by the Superintendence of Industry and Commerce and other External Circulars issued by the Superintendency of Industry and Commerce on the subject of the protection of personal data.

### B. SCOPE

This policy applies to the processing of personal data collected, controlled or commissioned by **DESMÉDICOS S.A.S.** to natural persons, and to the personal databases owned by **DESMÉDICOS S.A.S.** that contain personal information of

	<b>POL- POLITICA DE PROTECCIÓN DE DATOS PERSONALES</b>	<b>POL-003-GC</b>	
		FECHA	21/04/2023
		VERSIÓN	2

those who hold the status of employees, clients, consumers and, in general, users and third parties who access or register their data through our website.

Our Data Processing Policy and the Internal Manual of Policies and Procedures for the Protection and Processing of Personal Data, provide the guarantee and security over any type of data collected by our organization, complying with the legal guidelines and thus ensuring that all people feel confident in the management that the company is giving to their data.

### **C. MANAGEMENT TO WHICH THE PERSONAL DATA COLLECTED BY DESMÉDICOS S.A.S WILL BE SUBJECTED**

The personal data for which **DESMÉDICOS S.A.S** is the Controller are included in databases and will be used for the following purposes:

- a. Provide commercial benefits, offer services and products of interest;
- b. Allow the participation of information holders in loyalty programs with benefits, marketing and promotional activities;
- c. Inform about new products or services that are related to those received at the time of providing personal data;
- d. Deliver goods and services consistent with the customer's particular needs;
- e. and. Comply with obligations contracted with our clients when purchasing goods or services;
- f. Inform about changes in the aforementioned products or services;
- g. Evaluate the quality of the service;
- h. Carry out market studies on consumer habits;
- i. Obtain services and goods;
- j. Send response messages to people who communicate through the email service offered through the website;
- k. Have sufficient information about employees and collaborators.

	<b>POL- POLITICA DE PROTECCIÓN DE DATOS PERSONALES</b>	<b>POL-003-GC</b>	
		FECHA	21/04/2023
		VERSIÓN	2

## D. INVENTORY AND PURPOSES OF THE DATABASES WHICH DESMÉDICOS S.A.S PROCESSES.

### 1. On the Partners

The company **DESMÉDICOS S.A.S**, collects the personal data of its **PARTNERS**, and it is only revealed by the Company with the express authorization of the owner or when a Competent Authority requests it.

These databases are stored automatically or physically; and its purposes are the following:

- a. Call member meetings or assemblies to make decisions.
- b. Examine, approve or disapprove the year-end financial statements
- c. Confer powers, limitations and extensions among which the administrators will act
- d. Elect administrators and officers of the Company who are not selected by the Manager.
- e. Receive reports from the administrators and legal representative of the Company.

### 2. On the Employees.

**DESMÉDICOS S.A.S** collects the personal data of its Employees and it will only be revealed by the entity with the express authorization of the owner or when a Competent Authority requests it.

Databases are stored in an automated and physical manner.

The purposes for which the personal data of the company's employees are used are:

- a. Comply with the obligations imposed by Colombian labor law towards employers.
- b. Comply with obligations contracted with people directly or indirectly linked to **DESMÉDICOS S.A.S**.
- c. Making electronic payroll payments, social benefit payments, social security contribution payments, carrying out medical examinations (income, periodic and retirement), affiliations to social security systems (CCF, ARL, EPS, AFP), issuance of income and withholding certificates.
- d. Issue certifications related to the relationship of the data owner with the Company.

- e. Comply with the obligations imposed on the company as an employer, in relation to Occupational Health and Safety standards, and the so-called Occupational Health and Safety Management System (SG-SST).
- f. Manage the functions carried out by workers.
- g. Notify authorized contacts in case of emergencies during work hours or during work.
- h. Carry out due diligence, leaving the corresponding records that feed the company's PTEE (Business Ethics and Transparency Program) system.
- i. Consult memos or c attention warnings.
- j. Develop and apply the disciplinary process contained in the Internal Work Regulations.
- k. Coordinate the professional development of employees, employee access to the employer's IT resources and provide support for their use.
- l. Carry out general personnel selection and hiring processes.
- m. Contact authorized persons in emergency cases.
- n. Request and capture resumes through national job board portals, in order to carry out personnel selection processes.

Once the employment relationship has ended, **DESMÉDICOS S.A.S** will proceed to store all the personal data obtained from the selection process and the documentation generated in the development of the employment relationship, in a central file, subjecting the information to appropriate security measures and levels at all times. such as filing cabinets with restricted access and security locks, given that work information may contain sensitive data.

In any case, the information will not be processed for a period of more than twenty (20) years from its collection in accordance with the legal or contractual circumstances that make the handling of the information necessary.

	<b>POL- POLITICA DE PROTECCIÓN DE DATOS PERSONALES</b>	<b>POL-003-GC</b>	
		FECHA	21/04/2023
		VERSIÓN	2

### 3. About Clients.

**DESMÉDICOS S.A.S** collects the personal data of its clients and stores them in an automated database, which is classified by the company as reserved, and will only be revealed with the express authorization of the owner or when a Competent Authority requests it.

The purposes for which the personal data of DESMEDICOS S.A.S Clients are used will be:

- a. Submit quotes, commercial proposals and service orders.
- b. General linkage of each client to the company, opening them in the accounting program.
- c. Carry out Due Diligence processes according to the Company's PTEE.
- d. Inform about new products and services.
- e. Carry out billing processes.
- f. Carry out tax processes with clients as information on both national and district magnetic media.
- g. Achieve efficient communication related to our products, and other activities related to the corporate purpose of **DESMÉDICOS S.A.S**.
- h. Inform about changes to the products and services of **DESMÉDICOS S.A.S**.
- i. Evaluate the quality of the service.
- j. To carry out monitoring, post-sales and loyalty processes.
- k. Update data annually.
- l. To comply with obligations to our customers.
- m. Prepare the necessary client reports and manage their specific needs, such as: payments, portfolio collection, balance reporting; also follow up and receive communications about the status of your communications, requests, orders, etc.
- n. Send information by physical and/or digital means, known or yet to be known, about events, advertising, promotions and commercial offers related to the products offered by **DESMÉDICOS S.A.S**.
- o. Share information to offer products that may be of interest to the owner.
- p. Share personal data information with third parties, for purposes related to the logistics operation of transportation, shipping, among other services.

	<b>POL- POLITICA DE PROTECCIÓN DE DATOS PERSONALES</b>	<b>POL-003-GC</b>	
		FECHA	21/04/2023
		VERSIÓN	2

- q. Carry out specific marketing campaigns.
- r. Perform queries on financial information and credit history and report unfulfilled obligations to information centers.
- s. Manage your data to carry out the different collection management processes.
- t. For the development of the credit sales process, in order to validate the data provided by the client or to provide commercial and personal references.
- u. To carry out Due Diligence processes for linking the counterparty or client to the Company for the first time.
- v. Any other activity of a similar nature to those previously described that is necessary to develop the corporate purpose of DESMEDICOS S.A.S.

#### 4. About the Service Providers.

**DESMÉDICOS S.A.S.** processes and stores the personal information of its service-providing contractors in automated or physical databases; whose processing purposes are the following:

- a. Make contractual calls to request the services that the Company requires.
- b. Carry out selection and hiring processes.
- c. Carry out payments and accounting processes of a tax nature, exogenous information to the Dian and district information to the Ministry of Finance.
- d. Sign confidentiality agreements as those responsible for processing the Company's personal data.

#### 5. About the Suppliers.

DESMÉDICOS S.A.S., collects data from its Suppliers through the internet, telephone calls, web pages, that are Legal Entities; However, if personal data is processed by suppliers who claim to be Natural Persons, it will be stored in an automated database, which will be classified by the company as reserved and will only be revealed by DESMÉDICOS S.A.S with the express authorization of the owner or when a Competent Authority requests it.



	<b>POL- POLITICA DE PROTECCIÓN DE DATOS PERSONALES</b>	<b>POL-003-GC</b>	
		FECHA	21/04/2023
		VERSIÓN	2

The purposes for which the personal data of the DESMÉDICOS S.A.S Suppliers are used will be:

- a. Sending invitations for contract and carrying out procedures for the pre-contractual, contractual and post-contractual stages.
- b. Communication for matters inherent to the commercial relationship with our suppliers, information analysis, market intelligence, processing of information about our products, new or existing, services, promotions, offers and improvement of the service and products offered by DESMÉDICOS S.A.S.
- c. The others specifically established in the authorizations that are granted by the suppliers themselves.
- d. Payments of invoices and/or credits.
- e. For the presentation of tax matters required by law such as Magnetic and District Media.
- f. To carry out the respective updates.

DESMÉDICOS S.A.S will only collect from its suppliers the data that is necessary, relevant and not excessive for the purposes of selection, evaluation and execution of the contract that may arise.

## 6. About the WEBSITE of DESMEDICOS S.A.S.

DESMÉDICOS S.A.S, has a website: <https://www.desmedicos.com>, where information regarding the Company is published, a catalog of the products it sells, legal terms, policies, mission and vision, in accordance with Colombian regulations. , notices, articles, advertising and promotional content, blogs, chats, chatbots or WhatsApp customer service, among others. Through its website, the company may collect information from the owners who access it and who provide their personal data when filling out the contact form or request for information. DESMÉDICOS S.A.S will send information through the email or telephone number provided by the owner, authorizing us to process your personal data in accordance with the provisions of this Personal Data Processing Policy.

	<b>POL- POLITICA DE PROTECCIÓN DE DATOS PERSONALES</b>	<b>POL-003-GC</b>	
		FECHA	21/04/2023
		VERSIÓN	2

## 7. About the Management, Health and Safety at Work System.

As a consequence of the implementation of this system, a series of information and data collection was generated from the employees that make up the Company, both sensitive and personal information, in order to:

- a. Compile information on health and safety issues within the Company.
- b. Call your employees to hold Company Drill Days.
- c. Carry out the election of brigade members, Copasst and emergency committees in accordance with the Company's SGSST policies.
- d. Comply with the law regarding the SGSST processes that the Company must have.
- e. Keep employees and managers in general informed about updates, good practices, prohibitions and limitations that must be taken into account for the full protection of the interests of the Company's legal entity.

## 8. About the management to the Databases of Emergency Brigades, First Aid and COPASST

For the development of its corporate purpose, and in compliance with national regulations, a health and safety system has been implemented within **DESMEDICOS S.A.S.**, in which the Emergency Brigade, the Emergency Committee, the COPASST and those necessary were formed and organized. this guarantees the physical and emotional well-being of their workers.

For the purposes of the effective execution of the development of the activities of the different health committees and the implementation of the different processes that guarantee the safety of the Company, **DESMÉDICOS S.A.S.** requires collecting, storing, using, transmitting and, in general, carrying out activities related to the processing of personal data, which allow it to actively interact with the holders of such information and adequately and without interruptions execute the activities related to the statutes; Consequently, the purpose of the processing of personal information contained in the **SAFETY AND HEALTH AT WORK DATABASE** of **DESMEDICOS S.A.S** consists of:

	<b>POL- POLITICA DE PROTECCIÓN DE DATOS PERSONALES</b>	<b>POL-003-GC</b>	
		FECHA	21/04/2023
		VERSIÓN	2

- a. Establishment of communication channels with the owners of personal data, associated with the activities related to the previous paragraphs.
- b. Compliance with obligations related to the execution of the purpose of the company **DESMEDICOS S.A.S.**, inside and outside the national territory.
- c. Organization of events in which **DESMEDICOS S.A.S.** have some interest in participation.
- d. Adoption of control and security measures on the different facilities of **DESMEDICOS S.A.S** and its surroundings.

## 9. About the databases created through the use of the social network WhatsApp or similar messaging:

The administration, Management, area heads, and employees use the WhatsApp social network as a tool where the names and cell phone numbers of the different employees and personnel of the Company, or who have some connection with it, are registered. The main purposes are:

- a. Maintain expeditious communication, which allows resolving situations that require immediate attention among the organization's employees.
- b. Share contact details, locations, opinions, personal data that feed a database with information that could be considered sensitive.
- c. Exchange of communication regarding attention, queries and concerns that arise regarding the work that is the responsibility of each employee and that is shared by area or between the different areas of the Company.
- d. Registration of portfolio clients for sending collections, payment reminders and all processes that pertain to term sales in the Company.
- e. Registration and exchange of promotions, guidelines, advertising to the different clients of the Company managed by the commercial area.
- f. To address concerns and requests of a commercial nature from people who are interested in the company's products and are redirected through different social networks.



## POL- POLITICA DE PROTECCIÓN DE DATOS PERSONALES

POL-003-GC

FECHA 21/04/2023

VERSIÓN 2

This database is reserved and for the exclusive use of the company, the associated cell phone number or corporate cell numbers will be the property of **DESMEDICOS S.A.S** and will be the responsibility or responsibility of each employee assigned to said cell phone, a situation that cannot be delegated given the nature of the sensitive of the data processed by this means. The information will only be revealed or shared under the express authorization of the owners or by judicial or administrative order duly empowered by law.

In exceptional cases, when the cell phone is not corporate, but personal and processes are carried out with the client by the salesperson, to send information, advertising of products and services through their WhatsApp number; The use of this database will only be at your disposal or service while the salesperson fulfills his or her duties as an employee and cannot continue to be used once he or she is separated from the company; In any case, to protect the information, each salesperson or employee signs a confidentiality agreement.

In any case, the company will request that, expressly and preferably in writing, the processing of personal information such as cell phone number be authorized and that the opinions, decisions and statements made by this means, that is, be shared within the members of the same group or groups within the scope of application, use and control of the company.

The sole delivery of information voluntarily, redirected from the networks, or request for inclusion within a WhatsApp group for which **DESMEDICOS S.A.S** is responsible for its security within the development of its corporate purpose, will be considered unequivocal conduct through which The owner grants authorization for the processing of personal data that is shared, captured, used, circulated, deleted or updated on this social network.

	<b>POL- POLITICA DE PROTECCIÓN DE DATOS PERSONALES</b>	<b>POL-003-GC</b>	
		FECHA	21/04/2023
		VERSIÓN	2

## 10. About Emails:

The company uses as a tool an email service through which personal information of employees, heads of areas or departments, clients, service providers, suppliers and other natural or legal persons who have any link or relationship with **DESMEDICOS S.A.S.**

The purpose of this database is:

- a. Communicate with employees, clients, suppliers, managers and heads of areas or departments on matters of particular interest.
- b. Answer questions, resolve requests, requests, complaints or claims from clients, or people who have any connection of any nature with the company.
- c. Serve as a channel for the exercise of the rights of the owners of personal data.
- d. Have a record of the communications that are made by this means to the legal entity of the Company.

This database is reserved and for the exclusive use of the company, it will only be revealed or shared under the express authorization of the owners or by judicial or administrative order duly empowered by law.

## 11. Data capture through Social Networks.

**DESMEDICOS S.A.S.**, has an institutional presence through the Instagram social network; The use and processing of this network are for commercial purposes and content of interest to people or owners interested in our products and the company's clients. Likewise, for redirection to our website to request quotes and clear commercial concerns, learn about our virtual store of products offered and to attend through WhatsApp to the different requests and interest of potential clients and potential clients who are served by this means.

Through these networks **DESMEDICOS S.A.S.** publishes commercial, promotional and advertising content that captures the interest of the Owners, who interact in the service with the person in charge of managing said

	<b>POL- POLITICA DE PROTECCIÓN DE DATOS PERSONALES</b>	<b>POL-003-GC</b>	
		FECHA	21/04/2023
		VERSIÓN	2

networks and the cell phone number associated with them.

## 12. Management through the Customer Service Line.

The processing of personal data that DESMÉDICOS S.A.S collects through the customer service line is subject to compliance with the provisions set forth in Law 1581 of 2012, its regulatory decrees and this Personal Data Processing Policy that is established. is published on the website.

Therefore, personal data provided through the customer service line is protected by confidentiality and privacy regulations. In the collection and processing of said information **DESMEDICOS S.A.S** undertakes the observation of principles of purpose, freedom, truthfulness, confidentiality, security, transparency. That is, all the data requested is collected lawfully in accordance with Law 1581 of 2012 and its regulatory decrees with the consent of the owner, collecting only and exclusively the pertinent, correct, updated and necessary data, guaranteeing in all cases the full exercise of the rights of access, consultation, rectification, updating and deletion of personal data.

In cases of collection of personal data through the customer service line, authorization or consent for the processing of the owner's personal data will be obtained verbally. The task or recording must be kept in such a way that it allows for later consultation. When requesting the corresponding authorization from the owner of the information, the Privacy Notice must be clearly and expressly informed.

## 13. From the information collected for due diligence of the Business Ethics and Transparency Program system of DESMEDICOS S.A.S.

The Company **DESMEDICOS S.A.S** has established a Business Ethics and Transparency program; Within the implementation of this, the company's processes have adopted formats and documents that request personal information from the binding parties, consisting of public, private, semi-private data and, if

	<b>POL- POLITICA DE PROTECCIÓN DE DATOS PERSONALES</b>	<b>POL-003-GC</b>	
		FECHA	21/04/2023
		VERSIÓN	2

essential, sensitive data. This information is reserved and preserved for compliance with the Shared Diligence of the binding parties and counterparties in accordance with the regulations indicated by the Superintendency of Companies in Chapter XIII of the Basic Legal Circular. The purpose of the information requested in said process is aimed at complying with anti-corruption and anti-transnational bribery measures at **DESMEDICOS S.A.S.**

## **E. RIGHTS THAT ASSIST THE HOLDER OF THE INFORMATION CONTAINED IN THE DATABASES OF DESMÉDICOS S.A.S.**

The Owner of the personal data has the following rights:

- a. Know, update and rectify your personal data with DESMÉDICOS S.A.S., in its capacity as Data Controller.
- b. Request proof of the authorization granted to DESMÉDICOS S.A.S. in his capacity as Data Controller.
- c. Be informed by **DESMEDICOS S.A.S.**, upon request, regarding the use that has been given to your personal data.
- d. Submit complaints about infractions to the Superintendency of Industry and Commerce, once the consultation or claim process has been exhausted before the Data Controller, in accordance with the provisions of Law 1581 of 2012 and this Policy.
- e. Revoke the authorization and/or request the deletion of the data when the processing does not respect constitutional and legal principles, rights and guarantees.
- f. Free access to your personal data that has been processed.

	<b>POL- POLITICA DE PROTECCIÓN DE DATOS PERSONALES</b>	<b>POL-003-GC</b>	
		FECHA	21/04/2023
		VERSIÓN	2

## F. PROCEDURE FOR ACCESS, CONSULTATION, RECTIFICATION AND UPDATE OF PERSONAL DATA.

### 1. Channels to exercise the Rights of the Owners.

The Owners of the information have the right to access their personal data and the details of their processing, as well as to rectify and update them if they are inaccurate or to request their elimination when they consider that they turn out to be excessive or unnecessary for the purposes they justified. obtaining them or opposing their processing for specific purposes. The ways that have been implemented to guarantee the exercise of said rights, through the presentation of the respective request, are:

- a. Send communication to our physical offices, located at Carrera 77 B Bis No. 76-68 in the city of Bogotá D.C., Colombia.
- b. Customer service line: Bogotá (57) 601-7045641
- c. Email: [atencionalcliente@desmedicos.com](mailto:atencionalcliente@desmedicos.com)
- d. You can consult the text and content of the Personal Data Protection Policy of DESMÉDICOS S.A.S on the website [www.desmedicos.com](http://www.desmedicos.com)

These channels may be used by information holders or third parties authorized by law to act on their behalf through the following procedure:

### 2. Procedure for handling Queries, Claims and Requests.

#### a. Inquiries and requests.

The Owners or their successors may consult the personal information of the Owner that resides in DESMÉDICOS S.A.S, who will be responsible for providing all the information contained in the individual record or that is linked to the identification of the Owner, thus exercising their Right of Access.

This consultation will be free of charge, to know the personal data that is subject to processing by **DESMÉDICOS**



	<b>POL- POLITICA DE PROTECCIÓN DE DATOS PERSONALES</b>	<b>POL-003-GC</b>	
		FECHA	21/04/2023
		VERSIÓN	2

**S.A.S;** The owner of the information may submit a request through any of the communication channels implemented, indicating the information they wish to know through any of the channels indicated above.

The query, once received by the entity, will be responded to within a maximum period of ten (10) business days from the date of receipt thereof.

When it is not possible to attend to the query within said term, the interested party will be informed, expressing the reasons for the delay and indicating the new date on which such query will be attended, which in no case may exceed the following five (5) business days. at the expiration of the first term

## **b. Claims.**

The Owner or his successors who considers that the information contained in a database must be corrected, updated or deleted, or when they notice the alleged breach of any of the duties contained in the law, may file a claim with DESMÉDICOS S.A.S. which will be processed under the following rules:

The rights of rectification, updating or deletion or revocation of consent may only be exercised by:

- The owner or his successor in title, after accreditation of her identity.
- His representative, prior accreditation of the representation.

When the request is made by a person other than the owner and it is not proven that the request is acting on behalf of the owner, it will be considered not submitted. The request for rectification, updating, deletion or revocation must be submitted through the means enabled by DESMÉDICOS S.A.S and contain, at a minimum, the following information:

- Name and surname of the applicant and the owner.



## POL- POLITICA DE PROTECCIÓN DE DATOS PERSONALES

POL-003-GC

FECHA	21/04/2023
VERSIÓN	2

- Address and email of the owner or the information where he wishes to receive the response. In the absence of this information, the response will be delivered to the facilities of DESMÉDICOS S.A.S.
- Documents that prove the identity of the applicant and, if applicable, that of his representative with the respective authorization.
- Clear and precise description of the personal data with respect to which the owner seeks to exercise any of the rights and the specific request.
- If necessary, other elements or documents that facilitate the location of personal data.

The claim will always be made through written communication addressed to DESMÉDICOS. S.A.S with the identification of the Owner, the description of the facts that give rise to the claim, the address, and accompanying the documents that you want to assert; attending to the minimum information process described above.

If the claim is incomplete, the interested party will be required within five (5) days following receipt of the claim to correct the deficiencies. After two (2) months from the date of the request, without the applicant presenting the required information, it will be understood that he has withdrawn the claim.

In the eventuality that DESMÉDICOS S.A.S receives a Claim for which it is not competent to resolve, the company will notify the person who actually corresponds within a maximum period of two (2) business days and will inform the Owner.

Once the complete claim is received, the entity will include in the respective database a legend that says "claim in process" and the reason for it, within a period of no more than two (2) business days. The company will keep said legend in the data under discussion 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 receipt. When it is not possible to address the claim within said term, the entity will inform the Owner of the reasons for the delay and the new date on which the claim will be addressed, which in no case may exceed eight (8) business days following the expiration. of the first term.

	<b>POL- POLITICA DE PROTECCIÓN DE DATOS PERSONALES</b>	<b>POL-003-GC</b>	
		FECHA	21/04/2023
		VERSIÓN	2

### c. Procedural Requirement.

The Owner or his successor may only file a complaint with the Superintendence of Industry and Commerce once the Consultation or Claim process has been exhausted directly before the entity.

### d. Request for update and/or rectification.

**DESMEDICOS S.A.S**, will rectify and update, at the request of the owner, the information that is inaccurate or incomplete, in accordance with the procedure and terms indicated above, for which the Owner must submit the request according to the channels provided by the company, indicating the update and rectification of the data and in turn must provide the documentation that supports such request.

### e. Revocation of authorization and/or deletion of Data.

The Owner may revoke at any time the consent or Authorization given for the processing of his personal data, as long as there is no impediment enshrined in a legal or contractual provision.

Likewise, the Owner has the right to request at any time from **DESMEDICOS S.A.S** to the e-mail [atencionaldiente@desmedicos.com](mailto:atencionaldiente@desmedicos.com) the deletion or elimination of their personal data when:

- Consider that they are not being treated in accordance with the principles, duties and obligations provided for in current regulations.
- They have ceased to be necessary or relevant for the purpose for which they were obtained.
- The time necessary to fulfill the purposes for which they were obtained has elapsed.

Such deletion implies the elimination, either in whole or in part, of the personal information, in accordance with what is requested by the owner in the records, files, databases or treatments carried

	<b>POL- POLITICA DE PROTECCIÓN DE DATOS PERSONALES</b>	<b>POL-003-GC</b>	
		FECHA	21/04/2023
		VERSIÓN	2

out by **DESMEDICOS S.A.S.** The right of cancellation is not absolute and therefore **DESMEDICOS S.A.S** may deny revocation of authorization or deletion of personal data in the following cases:

- The owner has a legal or contractual duty to remain in the database.
- The deletion of data hinders judicial or administrative actions linked to tax obligations, the investigation and prosecution of crimes or the updating of administrative sanctions.
- The data is necessary to protect the legally protected interests of the owner; to carry out an action based on the public interest, or to comply with an obligation legally acquired by the owner.

### **III. AREA RESPONSIBLE FOR ATTENTION TO PETITIONS, INQUIRIES AND CLAIMS.**

The area responsible for addressing requests for access, rectification, updating, deletion of data or revocation of consent or authorization granted for the processing of your personal data is the Management of **DESMEDICOS S.A.S**, who may delegate this function to the DATA PROTECTION OFFICER. .

#### **a. DATA PROTECTION OFFICER.**

The Data Protection Officer who makes up the Habeas Data Protection area of the company, which is part of the Administrative unit, will be the person in charge of handling requests, queries, claims and other requests from the owners. of the data to exercise their rights. Any request, complaint or claim related to the handling of personal data, in application of the provisions of Law 1581 of 2012 and Decree 1377 of 2013, must be sent through the communication channels indicated in literal F. , numeral 1 of this policy and manual of personal data protection procedures of **DESMEDICOS S.A.S**

### **IV. NATIONAL REGISTRY OF DATABASES.**

**DESMEDICOS S.A.S** will proceed to promptly register in the National Registry of Databases in charge of the Superintendence of Industry and Commerce or the competent authority for this purpose, the information required about the Databases for which it is Responsible; Likewise, each year it will proceed to update said record in the SIC

	<b>POL- POLITICA DE PROTECCIÓN DE DATOS PERSONALES</b>	<b>POL-003-GC</b>	
		FECHA	21/04/2023
		VERSIÓN	2

directory, according to the procedure defined for this purpose by the Superintendence of Industry and Commerce.

## V. MANUAL FOR THE PROCESSING OF PERSONAL DATA.

This manual for the processing of personal data aims to guarantee the constitutional right that all people have to know, update and rectify the information that has been collected about them in the databases or files that DESMÉDICOS S.A.S has for the purposes provided for in the respective authorization of the owner.

### CHAPTER II. GENERAL PROVISIONS

**ARTICLE 1. PURPOSE.** Through this manual, the provisions of literal k) of article 17 of Law 1581 of 2012 are complied with, which regulates the duties that assist those responsible for the processing of personal data, among which is the obligation to adopt an internal manual of policies and procedures to guarantee adequate compliance with the law and, especially, to respond to queries and complaints.

Likewise, it has the purpose of regulating the procedures for the collection, handling and processing of personal data carried out by DESMÉDICOS S.A.S in order to guarantee and protect the fundamental right of Habeas Data within the framework of what is established in the same law and its decrees. regulatory.

**ARTICLE 2. DEFINITIONS.** For the purposes of applying the rules contained in this manual, the same definitions established in Chapter I – DEFINITIONS, of this Policy will be taken.

**ARTICLE 3. PRINCIPLES.** The principles established below constitute the general parameters that will be respected by DESMÉDICOS S.A.S in the processes of collection, use and processing of personal data.

- a. **Principle of purpose:** The Processing of personal data collected by DESMÉDICOS S.A.S obeys a legitimate purpose that is informed to the Owner;
- b. **Principle of freedom:** management can only be carried out with the prior, express and informed consent

	<b>POL- POLITICA DE PROTECCIÓN DE DATOS PERSONALES</b>	<b>POL-003-GC</b>	
		FECHA	21/04/2023
		VERSIÓN	2

of the Owner. Personal data will not be obtained or disclosed without prior authorization, or in the absence of a legal or judicial mandate that requires consent;

- c. **Principle of truthfulness or quality:** The information subject to management must be truthful, complete, exact, updated, verifiable and understandable. The Processing of partial, incomplete, fragmented or misleading data is prohibited;
- d. **Principle of transparency:** In the management, the right of the Owner to obtain from DESMÉDICOS S.A.S at any time and without restrictions, information about the existence of data that concerns him or her must be guaranteed;
- e. **Principle of restricted access and circulation:** Personal data, except public information, may not be available on the Internet or other means of dissemination or mass communication, unless access is technically controllable to provide knowledge restricted only to the Owners or authorized third parties.
- f. **Security principle:** The information subject to Processing by DESMÉDICOS S.A.S is protected through the use of technical, human and administrative measures that are necessary to provide security to the records, avoiding their adulteration, loss, consultation, use or unauthorized access. or fraudulent;
- g. **Principle of confidentiality:** All people within DESMÉDICOS S.A.S. involved in the Processing of personal data are obliged to guarantee the confidentiality of the information, even after their relationship with any of the tasks included in the Processing has ended.

### CHAPTER III. AUTHORIZATION

**ARTICLE 4. AUTHORIZATION.** The collection, storage, use, circulation or deletion of personal data by **DESMEDICOS S.A.S** requires the free, prior, express and informed consent of the owner thereof. **DESMEDICOS S.A.S**, in its capacity as responsible for the processing of personal data, has provided the necessary mechanisms to obtain the authorization of the owners, guaranteeing in all cases that it is possible to verify the granting of said authorization.



## POL- POLITICA DE PROTECCIÓN DE DATOS PERSONALES

POL-003-GC

FECHA	21/04/2023
VERSIÓN	2

**Taking Authorization.**- The authorization granted by the Owners may consist of a physical document, electronic document, data message, website, in any other format that guarantees its subsequent consultation, or through an appropriate technical or technological mechanism, which allows you to express or obtain consent via click or double click, through which it can be concluded unequivocally that if the Owner had not acted, the data would never have been captured and stored in the database. The authorization will be generated by DESMÉDICOS S.A.S and will be made available to employees, clients, suppliers, contractors, visitors, and any person subject to treatment; in advance and prior to the processing of your personal data.

The collection of data will be limited to those that are relevant and appropriate for the purposes reported by **DESMEDICOS S.A.S** and will be collected or required in accordance with current regulations, meeting the needs of the company for the development of its corporate purpose. Except in the cases expressly provided for in the Habeas Data Law, personal data may not be collected without authorization from the Owners. In accordance with article 9 of law 1581 of 2012, for the processing of personal data of the Owners, their prior and informed authorization is required. By accepting this policy, any owner who provides or facilitates information related to their personal data will be consenting to the processing thereof by DESMÉDICOS S.A.S under the terms and conditions indicated in the standard, that is, directly, express and unequivocal.

**ARTICLE 5. FORM AND MECHANISMS TO GRANT THE AUTHORIZATION.** The authorization can be:

Granted by the owner (i) in writing, (ii) orally or (iii) through conclusive and unequivocal conduct of the owner that allows it to be reasonably concluded that he granted the authorization. In no case can silence be assimilated to unequivocal conduct.

Regarding the authorization to use the social network WhatsApp or request for information through this network that occurs through the Instagram page, the mere delivery of information voluntarily or request for inclusion within a group. of WhatsApp for which **DESMEDICOS S.A.S** is responsible for its security within its legal or regulatory functions, will be considered as unequivocal conduct through which the owner grants authorization for the processing of personal data that is shared, captured, use, circulate, delete or update.

**ARTICLE 6. PROOF OF AUTHORIZATION.** The areas responsible for processing at DESMÉDICOS S.A.S must have the necessary measures to maintain records of when and how authorization was obtained from the holders of personal

	<b>POL- POLITICA DE PROTECCIÓN DE DATOS PERSONALES</b>	<b>POL-003-GC</b>	
		FECHA	21/04/2023
		VERSIÓN	2

data for their processing.

**ARTICLE 7. OCCASIONS WHEN AUTHORIZATION IS NOT NECESSARY.** The authorization of the Owners will not be necessary when it comes to:

- Information required by a public or administrative entity in the exercise of its legal functions or by court order;
- Data of a public nature, that is, names, surnames and identity document number.
- Cases of medical or health emergency;
- Processing of information authorized by law for historical, statistical or scientific purposes;
- Data related to the Civil Registry of Persons.

**ARTICLE 8. PRIVACY NOTICE:** The Privacy Notice is the physical, electronic document or in any other format, which is made available to the Owner for the processing of his or her personal data. This document communicates to the Owner the information regarding the existence of the information processing policies that will be applicable, the way to access them and the characteristics of the treatment that is intended to be given to personal data.

In order to guarantee in all cases, that the authorization includes all the elements that allow the owner to properly exercise their rights, the Privacy Notice DESMÉDICOS S.A.S will include, at least, the following information:

- a. The Treatment to which the personal data will be subjected and the purpose thereof;
- b. The optional nature of the response to the questions asked, when they relate to sensitive data or the data of children and adolescents;
- c. The rights that assist you as Owner;
- d. The identification, physical or electronic address and telephone number of the Data Controller or channels to exercise the rights of the owners.

**ARTICLE 9. SENSITIVE DATA:** Sensitive data is considered to be data that affects the privacy of the Owner or whose improper use may lead to discrimination. Among them are those that reveal a person's racial or ethnic origin, political orientation, religious or philosophical convictions, membership in unions, social organizations, human rights organizations or that promote the interests of any political party or that guarantee human rights. and guarantees from opposition political parties, as well as data related to health, sexual life and biometric data.



	<b>POL- POLITICA DE PROTECCIÓN DE DATOS PERSONALES</b>	<b>POL-003-GC</b>	
		FECHA	21/04/2023
		VERSIÓN	2

**DESMEDICOS S.A.S** is committed to protecting privacy during the processing of your identifiable and sensitive personal data. Therefore, in the event that the owners of the information expressly authorize the use of sensitive data, **DESMEDICOS S.A.S** is obliged to use them in accordance with the rules established in the national regulatory decrees.

**ARTICLE 10. SPECIAL REQUIREMENTS FOR THE PROCESSING OF PERSONAL DATA OF BOYS, GIRLS AND ADOLESCENTS.**

The Processing of personal data of children and adolescents is prohibited, except when it involves data of a public nature, in accordance with the provisions of article 7 of Law 1581 of 2012 and when said Processing complies with the following parameters and requirements:

- a. That responds to and respects the best interests of children and adolescents.
- b. That respect for their fundamental rights is ensured.

**DESMEDICOS S.A.S** does not process data on minors in the development of its corporate purpose.

## CHAPTER IV. RIGHTS AND DUTIES

**ARTICLE 11. RIGHTS OF INFORMATION HOLDERS.** The owner of personal data has the following rights:

- a. Know, update and rectify your personal data against **DESMÉDICOS S.A.S**, in its capacity as data controller.
- b. Request proof of the authorization granted to **DESMÉDICOS S.A.S** in its capacity as Data Controller.
- c. Be informed by **DESMÉDICOS S.A.S** upon request, regarding the use that has been given to your personal data.
- d. Submit complaints to the Superintendency of Industry and Commerce for violations of the provisions of Law 1581 of 2012, once the consultation or claim process has been exhausted before the Data Controller.
- e. Revoke the authorization and/or request the deletion of the data when the processing does not respect constitutional and legal principles, rights and guarantees.
- f. Access your personal data that has been processed.



## POL- POLITICA DE PROTECCIÓN DE DATOS PERSONALES

POL-003-GC

FECHA 21/04/2023

VERSIÓN 2

**ARTICLE 12. DUTIES IN RELATION TO THE PROCESSING OF PERSONAL DATA.** DESMEDICOS S.A.S will recognize, at all times, that the personal data are the property of the people to whom they refer and that only they can decide about them. In this sense, DESMÉDICOS S.A.S will use them only for those purposes for which it is duly authorized. As the person responsible for the processing of personal data, you will fulfill the following duties:

- a. Guarantee the Holders of the information, at all times, the full and effective exercise of the right of Habeas Data.
- b. Request and keep, under the conditions provided for in the Law, a copy of the respective authorization granted by the Information Holders.
- c. Duly inform the DESMÉDICOS S.A.S information holders about the purpose of the collection and the rights granted to them by virtue of the authorization granted.
- d. Guarantee the Holders of the information, at all times, the full and effective exercise of the right of Habeas Data.
- e. Guarantee the Holders of the information, at all times, the full and effective exercise of the right of Habeas Data.
- f. Request and keep, under the conditions provided for in the Law, a copy of the respective authorization granted by the Information Holders.
- g. Duly inform the DESMEDICOS S.A.S information holders about the purpose of the collection and the rights granted to them by virtue of the authorization granted.
- h. Maintain the information under the security conditions necessary to prevent its adulteration, loss, consultation, use or unauthorized or fraudulent access.
- i. Guarantee that the information provided to the Data Processor is true, complete, accurate, updated, verifiable and understandable.
- j. Provide the Data Processors, as the case may be, with only data whose Processing is previously authorized in accordance with the provisions of the Habeas Data Law.
- k. Require management personal at all times to respect the security and privacy conditions of the information of the Information Holders and visitors of **DESMEDICOS S.A.S.**
- l. Process queries and claims made in the terms indicated in Law 1581 of 2012.
- m. Adopt an internal manual of policies and procedures to guarantee adequate compliance with the Law and, especially, to respond to queries and complaints.
- n. Inform the Data Processor when certain information is under discussion by the Owner, once the claim has



## POL- POLITICA DE PROTECCIÓN DE DATOS PERSONALES

POL-003-GC

FECHA 21/04/2023

VERSIÓN 2

been submitted and the respective process has not been completed.

- o. Inform the information holders of DESMEDICOS S.A.S, upon request, about the treatment given to their data.
- p. Inform the data protection authority, Superintendency of Industry and Commerce – SIC, when violations of security codes occur and there are risks in the administration of the information of the Owners of **DESMEDICOS S.A.S.**
- q. Comply with the instructions and requirements issued by the Superintendence of Industry and Commerce.

### CHAPTER V. ACCESS, CONSULTATION AND CLAIM PROCEDURES

**ARTICLE 13.** For all purposes of carrying out the procedure for access, consultation and complaints from the owners regarding their personal data, they can be referred to the process stated in the literal:

#### G. PROCEDURE FOR ACCESS, CONSULTATION, RECTIFICATION AND UPDATE OF PERSONAL DATA IN THIS POLICY.

**ARTICLE 14.** RECTIFICATION AND UPDATE OF DATA. DESMÉDICOS S.A.S has the obligation to rectify and update, at the request of the owner, the latter's information that turns out to be incomplete or inaccurate, in accordance with the procedure and terms indicated above. In this regard, the following will be taken into special account:

- a. In requests for rectification and updating of personal data, the owner must indicate the corrections to be made and provide the documentation that supports his request.
- b. **DESMEDICOS** has complete freedom to enable mechanisms that facilitate the exercise of this right, as long as these benefit the owner. Consequently, electronic or other means that are considered relevant may be enabled.
- c. **DESMEDICOS** may establish forms, systems and other simplified methods, which must be informed in the privacy notice and which will be made available to interested parties on the website.

Every time a new tool is made available to facilitate the exercise of their rights by the owners of information or modifies existing ones, it will inform it through its website ([www.desmedicos.com](http://www.desmedicos.com)) or any other suitable means to

	<b>POL- POLITICA DE PROTECCIÓN DE DATOS PERSONALES</b>	<b>POL-003-GC</b>	
		FECHA	21/04/2023
		VERSIÓN	2

this end.

**ARTICLE 15. DELETION OF DATA.** The owner has the right, at any time, to request DESMÉDICOS S.A.S. the deletion (elimination) of your personal data when:

- a. Consider that they are not being treated in accordance with the principles, duties and obligations provided for in Law 1581 of 2012.
- b. They are no longer necessary or relevant for the purpose for which they were collected.
- c. The period necessary to fulfill the purposes for which they were collected has been exceeded.

This deletion implies the total or partial elimination of personal information in accordance with what is requested by the owner in the records, files, databases or treatments carried out by DESMÉDICOS S.A.S.

The right of cancellation is not absolute and may be denied by **DESMEDICOS S.A.S** when:

- a. The owner has a legal or contractual duty to remain in the database.
- b. The deletion of data hinders judicial or administrative actions linked to tax obligations, the investigation and prosecution of crimes or the updating of administrative sanctions.
- c. The data is necessary to protect the legally protected interests of the owner; to carry out an action based on the public interest, or to comply with an obligation legally acquired by the owner.

If the cancellation of personal data is appropriate, **DESMEDICOS S.A.S** will operationally carry out the deletion in such a way that the deletion does not allow the recovery of the information.

In the event that **DESMEDICOS S.A.S** proceeds with the deletion of one or more personal data at the request of its owner, the owner understands that such deletion will mean the loss of commercial or personal benefits that resulted in these data resting in the databases.

**ARTICLE 16. REVOCATION OF AUTHORIZATION.** The owners of the personal data may revoke their consent to the processing of their personal data at any time, as long as it is not prevented by a legal or contractual provision,

	<b>POL- POLITICA DE PROTECCIÓN DE DATOS PERSONALES</b>	<b>POL-003-GC</b>	
		FECHA	21/04/2023
		VERSIÓN	2

communicating this decision to **DESMEDICOS S.A.S** by any of the means defined in this Manual.

It will be necessary for the owner, when submitting the request to revoke the consent granted to **DESMEDICOS S.A.S**, to indicate whether the revocation he intends to make is total or partial. In the second hypothesis, it must be indicated which treatment the holder does not agree with.

There will be cases in which consent, due to its necessary nature in the relationship between the owner and person responsible for the fulfillment of a contract, cannot be revoked by legal or contractual provision.

Without prejudice to the foregoing, in the event that **DESMEDICOS S.A.S** proceeds with the revocation of one or more personal data at the request of its owner, the owner understands that such deletion will mean the loss of commercial or personal benefits that resulted in these data being stored in the databases.

**ARTICLE 17. DESTRUCTION OF DATABASES.** **DESMEDICOS S.A.S** will proceed to completely destroy the Databases whose purpose has ceased or ended within a period not exceeding three (3) months from the moment of termination or cessation of the purpose. The destruction of the Database will be recorded in a document signed by the person responsible and in charge of the corresponding database.

## CHAPTER VI. SECURITY OF THE INFORMATION

**ARTICLE 20. INFORMATION SECURITY.** **DESMEDICOS S.A.S** has implemented the necessary technical, human and administrative measures to provide security to the records, preventing their adulteration, loss, consultation, unauthorized or fraudulent use or access.

Personal information will generally be stored in **DESMEDICOS** databases or in databases maintained by those in charge of the databases.

**ARTICLE 21. IMPLEMENTATION OF SECURITY MEASURES.** **DESMEDICOS S.A.S** has developed internal applications and procedures to offer security measures for the protection and processing of personal data stored in the databases

	<b>POL- POLITICA DE PROTECCIÓN DE DATOS PERSONALES</b>	<b>POL-003-GC</b>	
		FECHA	21/04/2023
		VERSIÓN	2

and mitigate the risk of access and/or improper, fraudulent or unauthorized use of personal data. These measures within the organization are recorded in the comprehensive data protection program document, which guarantees the minimization of risks and incidents in the management of information processing and also the constant evaluation of the data protection implementation system. data and proper training for personnel who handle information in the Company. DESMÉDICOS S.A.S will maintain mandatory security protocols for personnel who have access to personal data and information systems.

The procedure must consider, at a minimum, the following aspects:

- a. Scope of application of the procedure with detailed specification of the protected resources.
- b. Measures, norms, procedures, rules and standards aimed at guaranteeing the level of security required in Law 1581 of 2012.
- c. Functions and obligations of staff.
- d. Structure of personal databases and description of the information systems that process them.
- e. Procedure for notification, management and response to incidents.
- f. Procedures for making backup copies and recovering data.
- g. Periodic controls that must be carried out to verify compliance with the provisions of the security procedure that is implemented.
- h. Measures to be adopted when a support or document is going to be transported, discarded or reused.
- i. The procedure must be kept updated at all times and must be reviewed whenever relevant changes occur in the information system or its organization.
- j. The content of the procedure must be adapted at all times to the current provisions regarding the security of personal data.

**ARTICLE 22. EXCHANGE OF PERSONAL INFORMATION.** DESMEDICOS S.A.S may share personal information with those it hires as Data Processors, those third parties that provide support services. These third parties can only use the personal information that we share with them to perform the contracted services on our behalf and are obliged to maintain its confidentiality.

In some cases, **DESMEDICOS S.A.S** may share personal information with third parties that partner to provide products and services to their customers. If they do so, these partners must be required to use the personal information

	<b>POL- POLITICA DE PROTECCIÓN DE DATOS PERSONALES</b>		<b>POL-003-GC</b>	
			FECHA	21/04/2023
	VERSIÓN	2		

provided in a manner consistent with the purposes for which it was originally obtained (or for the purposes that the owner subsequently authorized) and only in the manner contemplated in this Policy and in accordance with the Privacy Notice and other regulations that regulate the matter.

On certain occasions, **DESMEDICOS S.A.S** may also share or transfer personal information to unrelated third parties. For example, you may provide personal information to a third party (i) at the request of the owner; (ii) to comply with a legal demand or court order; (iii) to investigate a possible crime, such as identity theft; or (iv) under similar circumstances. In such case, appropriate measures must be taken to protect personal information.

## CHAPTER VII. FINAL PROVISIONS

**ARTICLE 23. VALIDITY AND MODIFICATION OF THE POLICY, MANUAL OR PRIVACY NOTICE.** This Policy will apply from March 2023. **DESMÉDICOS S.A.S** reserves the right to update or modify this Policy and Manual at any time and without prior notice, by publishing the revised version of the same in the media defined to such an end. **DESMÉDICOS S.A.S** also reserves the right to update or modify the Privacy Notice of the website at any time by publishing the modified Notice on the website. In the event of modification of this Policy and Manual or the Privacy Notice, the modification will only apply to personal information obtained after publishing the modified Policy, Manual or Privacy Notice on the **DESMÉDICOS S.A.S** website.

**ARTICLE 24.** For all purposes, the policy, manual and privacy notice of **DESMEDICOS S.A.S** were reviewed and modified to version 2 on March 26, 2024.

**ARTICLE 25. ANNEX 1. ABOUT THE PRIVACY NOTICE.**

### PRIVACY NOTICE DESMEDICOS S.A.S.

**DESECHABLES MEDICOS S.A.S**, acronym: **DESMEDICOS S.A.S**. domiciled in the City of Bogotá, Colombia; In compliance with Law 1581 of 2012 and Decree 1377 of 2013, it is permitted to inform its clients, suppliers, service providers,

	<b>POL- POLITICA DE PROTECCIÓN DE DATOS PERSONALES</b>	<b>POL-003-GC</b>	
		FECHA	21/04/2023
		VERSIÓN	2

employees and the general public, both active and inactive, who have direct and indirect links with the company, Owners of Personal Data: which are included in the company's database, which has been collected in the development of its corporate purpose, on the occasion of the commercial and labor relations established.

### ¿How to contact us?

- **ADDRESS:** Carrera 77 B Bis No. 76-68 of the city of Bogotá D.C., Colombia.
- **EMAIL:** [atencionalcliente@desmedicos.com](mailto:atencionalcliente@desmedicos.com)
- **WEBSITE:** [www.desmedicos.com](http://www.desmedicos.com)
- **CUSTOMER SERVICE LINE:** Bogotá (601) 7045641

Your personal data will be included in a database and will be used for the purposes and treatments established in our Personal Data Processing Policy in accordance with Law 1581 of 2012. Among them:

- a. Submit quotes, commercial proposals and service orders.
- b. Carry out promotional, loyalty and marketing activities.
- c. General linkage of each client.
- d. Inform about new products and services.
- e. Carry out billing processes.
- f. Carry out tax processes as information on both national and district magnetic media.
- g. Achieve efficient communication related to our products, and other activities related to the corporate purpose of **DESMEDICOS S.A.S.**
- h. Inform about changes to the products and services of **DESMEDICOS S.A.S.**
- i. Evaluate the quality of the service.
- j. Update data annually.
- k. To comply with obligations to our customers.
- l. Put specialized Software at the service of our clients, employees, service providers, suppliers; through which their specific needs will be managed, track and receive reports on the status of their communications, requests, orders, payments, portfolio, etc.
- m. Respond to requests through our customer service line available for the commercial processes carried out by the company.



	<b>POL- POLITICA DE PROTECCIÓN DE DATOS PERSONALES</b>	<b>POL-003-GC</b>	
		FECHA	21/04/2023
		VERSIÓN	2

n. And the other processing purposes established in the personal data processing policy of DESMEDICOS S.A.S.

**Holders of personal data are informed that they can exercise their rights and consult the Personal Data Processing Policy of DESMÉDICOS S.A.S on the website: [www.desmedicos.com](http://www.desmedicos.com) or request it through email: [atencionalcliente@desmedicos.com](mailto:atencionalcliente@desmedicos.com)**

**ARTICLE 26. ANNEX 2. ON THE PRIVACY NOTICE OF VIDEO SURVEILLANCE CAMERAS.**

**PRIVACY NOTICE DESMEDICOS S.A.S  
VIDEO SURVEILLANCE CAMERAS**

**DESMEDICOS S.A.S.**, informs you that it has a monitoring system with security and surveillance cameras, through which you could be recorded and monitored. By entering our facilities or offices, you unequivocally authorize the processing of the images collected, in accordance with our Personal Data Processing Policy.

The purposes for which **DESMEDICOS S.A.S** processes personal data collected by surveillance cameras are:

- a. Ensure security in the internal and external areas of the Company.
- b. Ensure the care and safety of inventory, goods and equipment owned by the Company.
- c. Control the entry, stay and exit of visitors, service providers, clients, and other people external to the company's facilities.
- d. Have a visual record of the Company's daily activity.
- e. Ensure that the work regulations are observed regarding responsibility and the care and use of the goods and equipment that Management makes available to its workers to carry out their daily activities.
- f. Ensure the security of vehicles and other company assets that remain on company premises.

	<b>POL- POLITICA DE PROTECCIÓN DE DATOS PERSONALES</b>	<b>POL-003-GC</b>	
		FECHA	21/04/2023
		VERSIÓN	2

We inform you that you can exercise your rights as the owner of personal data through the following channels:

- **ADDRESS:** Carrera 77 B Bis No. 76-68 City of Bogotá D.C., Colombia.
- **EMAIL:** [atencionalcliente@desmedicos.com](mailto:atencionalcliente@desmedicos.com)
- **WEBSITE:** [www.desmedicos.com](http://www.desmedicos.com)
- **CUSTOMER SERVICE LINE:** Bogotá (601) 7045641

Cordially,



**ELIANA ÁNGELA MODENA**  
General Manager