

PERSONAL DATA PROTECTION POLICY

CORRECAMINOS DE COLOMBIA

Data Controller

CORRECAMINOS DE COLOMBIA, a non-profit organization identified with NIT 830068502-1, established in the minutes of February 16, 2000, issued in its Constitutive Assembly, registered before the Bogotá Chamber of Commerce on March 8, 2000 under number 00028611 of Book I of Non-Profit Entities, located in Bogotá at Calle 86B No. 15-22, Office 301.

Telephone: 6012563765

Email: correcaminos@correcaminoscolombia.com

Purpose

CORRECAMINOS DE COLOMBIA, hereinafter (THE ASSOCIATION), in compliance with Statutory Law 1581 of 2012 and Regulatory Decree 1377 of 2013 regarding the proper management and administration of Personal Data, has developed its Personal Data Processing Policy. Its purpose is to guarantee that all individuals or legal entities may update and/or correct their information stored in THE ASSOCIATION's databases.

Scope of Application

This Personal Data Processing Policy applies to all individuals and legal entities registered in THE ASSOCIATION's databases.

Definitions

For proper understanding of Law 1581 of 2012 and Decree 1377 of 2013, the following definitions apply:

- **Authorization:** Prior, express, and informed consent of the Data Subject for the processing of Personal Data.
- **Database:** Organized set of Personal Data subject to processing.
- **Personal Data:** Any information associated or that can be associated with one or more specific or identifiable individuals.
- **Data Processor:** Individual or legal entity that processes Personal Data on behalf of the Data Controller.
- **Data Controller:** Individual or legal entity that decides on the database and/or the processing of data.
- **Data Subject:** Individual whose personal data is being processed.
- **Processing:** Any operation involving Personal Data such as collection, storage, use, circulation, or deletion.

Principles

These are the rules governing handling, use, processing, and storage of Personal Data collected in THE ASSOCIATION's databases.

- **Restricted access and circulation:** Data processing must respect constitutional and legal limits. Only authorized individuals or those permitted by law may process the data.
- **Confidentiality:** All persons involved in processing private Personal Data must keep it confidential even after ending their relationship with THE ASSOCIATION.
- **Purpose:** Processing must serve a legitimate purpose, which must be communicated to the Data Subject.
- **Legality:** Processing must comply with applicable laws.
- **Freedom:** Processing requires the Data Subject's prior, express, and informed consent unless exempted by law.
- **Security:** Data must be safeguarded with appropriate technical, human, and administrative measures to prevent alteration, loss, or unauthorized access.
- **Transparency:** Data Subjects have the right to request information about their data at any time.
- **Accuracy:** Personal Data must be truthful, complete, accurate, updated, verifiable, and understandable.

Database Contents

THE ASSOCIATION's databases may include: name, surname, ID number and type, gender, physical address, email address, landline and/or mobile number.

Sensitive Data—those affecting privacy or that may lead to discrimination—require explicit authorization and must be essential for THE ASSOCIATION's activities.

Data regarding minors will only include public information and must respect their prevailing rights.

Data Processing

With authorization from Data Subjects and under Law 1581 of 2012, THE ASSOCIATION may compile, store, update, systematize, and organize the information while ensuring confidentiality and security.

Cases Where Authorization Is Not Required

According to Article 10 of Law 1581 of 2012:

- Data requested by public or administrative authorities in legal functions or by judicial order.
- Public data.
- Medical or health emergencies.
- Processing for historical, statistical, or scientific purposes.
- Data related to civil registry records.

Purpose of Data Processing

Data is used to fulfill THE ASSOCIATION's mission: organizing, supporting, and sponsoring events of athletic, cultural, educational, or social nature — directly or through third parties.

Data of clients, suppliers, partners, and past or current employees is preserved to maintain commercial, civil, and labor relations.

Obligations of THE ASSOCIATION

As per Article 18 of Law 1581 of 2012, THE ASSOCIATION must:

1. Guarantee Data Subjects' rights at all times.
2. Request and keep copies of authorizations.
3. Inform the Data Subject about the purpose of data collection.
4. Protect data against alteration or unauthorized access.
5. Ensure data is truthful and updated.
6. Update information promptly.
7. Correct erroneous data.
8. Provide only authorized data to the Data Processor.
9. Demand confidentiality and security from Data Processors.
10. Process queries and claims.
11. Adopt an internal manual for data protection.
12. Inform about disputed data when applicable.
13. Inform Data Subjects about the use of their data.
14. Report security violations to authorities.
15. Comply with instructions from the Superintendence of Industry and Commerce.

Rights of Data Subjects

Under Article 8 of Law 1581 of 2012, Data Subjects may:

- Know, update, or correct their data.
- Request proof of authorization.
- Be informed about how their data is used.
- File complaints before the Superintendence of Industry and Commerce.
- Revoke authorization or request data deletion under legal conditions.
- Access their data free of charge.

Procedures to Exercise Rights

Inquiries

Data Subjects or their successors may request information stored in THE ASSOCIATION's databases.

Requests must be sent in writing or by email.

Response time:

- Maximum 10 business days.
- If extra time is needed, an extension of up to 5 additional business days may be granted with notice.

Claims

Data Subjects may request correction, update, or deletion, or report law violations.

Rules:

- Claims must be submitted in writing or email with identification, description, and supporting documents.

- If incomplete, the Data Subject has 5 days to correct it.
- After 2 months without correction, the claim is considered withdrawn.
- Claims are marked as “claim in process” within 2 business days.
- Maximum response time: 15 business days, with a possible 8-day extension with notice.

Responsible Office for Inquiries and Claims

CORRECAMINOS DE COLOMBIA

Address: Calle 86B No. 15-22, Office 301

Telephone: 6012563765

Email: correccaminos@correccaminoscolombia.com

Validity of the Databases

This policy is effective as of November 1, 2016. THE ASSOCIATION may update it in accordance with the law.

Databases will remain valid indefinitely while necessary for legal, commercial, labor, and accounting purposes. Personal data may be deleted upon request unless legally or contractually required to remain.

PERSONAL DATA PROCESSING AUTHORIZATION

I authorize CORRECAMINOS DE COLOMBIA, as Data Controller under Law 1581 of 2012 and its regulations, to collect, store, use, transfer, or transmit my personal data — including but not limited to: name, alias, voice, signature, initials, likeness, image, and any other related information — for promotional, marketing, or advertising purposes on its official digital platforms (Facebook, Twitter, Instagram, YouTube, TikTok) or any communication channel, inside or outside the country.

My data may be shared with third parties that have sponsorship, commercial offers, or business relationships with CORRECAMINOS DE COLOMBIA.

This authorization is granted free of charge and for life. I waive any right to compensation for the use of my data. All related proprietary rights belong to CORRECAMINOS DE COLOMBIA.

I acknowledge my right to access, update, correct, or request deletion of my data unless a legal or contractual obligation prevents removal. I may exercise these rights by contacting CORRECAMINOS DE COLOMBIA via:

- Email: correccaminos@correccaminoscolombia.com (subject: “DERECHO DE HABEAS DATA”)
- Telephone: 601 256 3765
- Address: Calle 86B # 15-22 Office 301, Bogotá D.C.