	Data processing policy			
	RUEDATA			
	Preparation: Legal Department	Date: 01/01/23	Version: 01	Validity: 01/01/26

**PRIVACY AND DATA PROCESSING POLICY
RUEDATA S.A.S
NIT. 901.132.481-4**

This Privacy and Data Processing Policy, the scope of the use and processing of personal data of employees (including job applicants), clients, suppliers, and shareholders of RUEDATA S.A.S (hereinafter referred to as "RUEDATA") is delineated. Furthermore, the purposes of such processing and the rights accruing to all data subjects for whom RUEDATA performs processing are established.

I. INFORMATION OF THE CONTROLLER


- 1.1. RUEDATA is a commercial entity with the corporate purpose of data processing, hosting, and related activities. This includes the development of computer systems (planning, analysis, design, programming, testing), information technology consulting, and the administration of computer facilities, as well as the editing of computer programs (software).

The company, for the fulfillment of its corporate purpose, may undertake any lawful commercial act. In addition, it will engage in, among other activities, the following:

- A) Design, development, and implementation of custom computer systems.
- B) Construction of computer products and their respective commercialization.
- C) Training, consultancy, and advisory services in all matters related to technology, engineering, e-commerce, internet business, graphic design, and internet marketing.

The company will also develop, market, and distribute its computer applications in a Software as a Service (SAAS) model, among other activities.

- 1.2. Our main office is located in Bogotá D.C., Colombia, at Avenida Calle 127 D # 19-18 in the city of Bogotá, Colombia.
- 1.3. The company has an independent subsidiary established in accordance with Mexican laws, with its registered office in Puebla, Mexico. The first certified copy of its constitution was registered in the Public Registry of Commerce of Puebla under the electronic commercial folio number N-2020066021.

	Data processing policy			
	RUEDATA			
	Preparation: Legal Department	Date: 01/01/23	Version: 01	Validity: 01/01/26

- 1.4. The company has an independent entity named **RUEDATA BRASIL TECNOLOGY LTDA**, a commercial entity duly constituted in accordance with the laws of Brazil.
- 1.5. The aforementioned entities are subsidiaries of their parent company, RUEDATA INC, a commercial entity duly constituted in accordance with the laws of the United States, particularly in the State of Delaware.
- 1.6. The company has the following communication channels, through which queries, complaints, or claims related to the processing of personal data may be submitted:
- ✓ Physical Address: Bogotá D.C., en la Calle 127D # 19-18 de la ciudad de Bogotá, Colombia
 - ✓ Email: legal@ruedata.com
 - ✓ Phone number: (+57) 3502467175
 - ✓ Web site: <https://ruedata.com>


II. LEGAL FRAMEWORK AND SCOPE OF APPLICATION

The present Personal Data Processing Policy is drafted in accordance with the provisions of the Political Constitution, Law 1581 of 2012, Regulatory Decree 1377 of 2013; Constitutional Court Judgments C – 1011 of 2008, and C -748 of 2011; as well as the Resolutions and External Circulars issued by the Superintendence of Industry and Commerce regarding the National Database Registry.

For the data collected in Mexico, the provisions of the Federal Law on Protection of Personal Data Held by Private Parties or Data Protection Law are applied.


Likewise, the company adheres to the provisions of LGPD (Lei Geral de Proteção de Dados Pessoais), which is the data protection law of Brazil.

The aforementioned provisions and their complements will be applied by RUEDATA regarding the collection, storage, use, circulation, deletion, and all activities constituting the processing of personal data.

	Data processing policy			
	RUEDATA			
	Preparation: Legal Department	Date: 01/01/23	Version: 01	Validity: 01/01/26

III. DEFINITIONS

- 3.1. Authorization: Prior, express, and informed consent from the Data Subject to carry out the processing of personal data.
- 3.2. Privacy Notice: Verbal or written communication generated by the data controller, addressed to the data subject for the processing of their personal data. Through this communication, the data subject is informed about the existence of the information processing policies applicable to them, how to access them, and the purposes of the intended processing of personal data.
- 3.3. Data base: An organized set of personal data that is subject to processing.
- 3.4. Personal data: Any information linked or that can be associated with one or more specific or identifiable natural persons.
- 3.5. Public Data: Data that is not semi-private, private, or sensitive. Public data includes, among others, information related to the civil status of individuals, their profession or occupation, and their status as a merchant or public servant. By its nature, public data may be contained in public records, official documents, gazettes, and duly executed court judgments that are not subject to confidentiality.
- 3.6. Semi-private data: Semi-private data is information that is not of an intimate, private, or public nature, and its knowledge or disclosure may be of interest not only to the data subject but also to a certain sector or group of people or society in general. This includes financial and credit-related data for commercial or service activities referred to in Title IV of Law 1266 of 2008.
- 3.7. Sensitive data: Sensitive data refers to information that affects the privacy of the data subject or whose misuse can lead to discrimination. Examples include data revealing racial or ethnic origin, political orientation, religious or philosophical beliefs, membership in unions, social organizations, human rights organizations, or promoting the interests of any political party, as well as data related to health, sexual life, and biometric data.


	Data processing policy			
	RUEDATA			
	Preparation: Legal Department	Date: 01/01/23	Version: 01	Validity: 01/01/26

- 3.8. Private data: Private data is information that, due to its intimate or confidential nature, is relevant only to the data subject.
- 3.9. Data Processor: Natural or legal person, public or private, who, either alone or in association with others, processes personal data on behalf of the data controller.
- 3.10. Data Controller: Natural or legal person, public or private, who, either alone or in association with others, decides on the database and/or the processing of data.
- 3.11. Data Subject: Natural person whose personal data is subject to processing.
- 3.12. Transfer: The transfer of data occurs when the data controller and/or data processor, located in Colombia, sends information or personal data to a recipient, who is also responsible for processing and may be located inside or outside the country.
- 3.13. Transmission: Processing of personal data that involves the communication of such data within or outside the territory of the Republic of Colombia when the purpose is to carry out processing by the Processor on behalf of the Controller.
- 3.14. Processing: Any operation or set of operations on personal data, such as collection, storage, use, circulation, or deletion.

IV. DATA TO BE COLLECTED

- 2.1. Regarding Employees and Job Applicants, RUEDATA will collect and process the following data:

Name and Surnames, Nationality, Marital Status, Identification Number, Military Service Record, Professional Card, Fingerprint, Date and Place of Birth, Correspondence Address, IP Address, Contact Phone, Email Address, Work, Academic, and Financial History, References, Commercial or Financial Information, Judicial, Disciplinary, and Family Background with other companies or public entities, Recent Photographs, Images from Surveillance Cameras; Occupational Medical History; Name, Identification Number, Phone, Gender, Date and Place of Birth, Workplace, Position, or Profession of the spouse or permanent partner of employees and contractors and their relatives up to the

	Data processing policy			
	RUEDATA			
	Preparation: Legal Department	Date: 01/01/23	Version: 01	Validity: 01/01/26

fourth degree of consanguinity, second of affinity, and/or first of civil, and any other data necessary to achieve the purposes described in this policy.

2.2. Regarding RUEDATA's Clients, the company will collect and process the following data:

Name and Surnames, Business Name, Identification Number, Correspondence Address, IP Address, Contact Phone, Email Address, Commercial and Judicial Background, Business Relationships with other companies or public entities, Vehicle License Plates and Ownership Card, Technical Information related to vehicles and their parts such as tires, needs and interests, financial and tax information, signature, dates and times of access to RUEDATA's facilities, and any other data necessary to achieve the purposes described in this policy and in the provision of contracted services.


2.3. Regarding RUEDATA's Suppliers, the company will collect and process the following data:

Name and Surnames, Identification Number, Correspondence Address, Contact Phone, Email Address, Commercial and Judicial Background, Business Relationships with other companies or public entities, needs and interests, financial and tax information, signature, dates and times of access to RUEDATA's facilities, and any other data necessary to achieve the purposes described in this policy and in the development of contracted services.

2.4. Concerning the shareholder database, RUEDATA will collect and process the following data:

Name and Surnames, Identification Number, Correspondence Address, Contact Phone, Email Address, Commercial and Judicial Background, Financial and Tax Information, and any other data necessary to achieve the purposes described in this policy.

2.5. Sensitive data: RUEDATA will only collect and/or process data considered as Sensitive Data in cases permitted by the law. It is further informed to Data Subjects that they are not obliged to provide such data or authorize its processing.

	Data processing policy			
	RUEDATA			
	Preparation: Legal Department	Date: 01/01/23	Version: 01	Validity: 01/01/26


2.6. Sensitive data of minors: RUEDATA will only use, store, and process personal data of minors who are children, descendants, or dependents of RUEDATA's employees or contractors. The purpose of such processing will be solely to plan and carry out activities related to the personal and family well-being of the employees and minors.

2.7. Sensitive Data regarding health and medical history: Data related to the health status of employees or contractors are Sensitive Data. In accordance with current regulations, Data Subjects are informed that they are not obliged to provide such data or authorize its processing. Once these data are provided and the corresponding consent is granted, the data will be collected and processed solely for the purposes described in this Policy.

V. PURPOSE OF THE COLLECTION OF PERSONAL DATA AND THEIR PROCESSING

RUEDATA S.A.S may use personal data for the following purposes: a) To execute existing contractual relationships with its clients, suppliers, and employees, including the payment of contractual obligations; b) To provide the services and/or products required by its users; c) To inform about new products or services and/or about changes to them; d) To evaluate the quality of the service; e) To conduct internal studies on consumption habits; f) To send commercial, advertising, or promotional information about products and/or services, events and/or promotions of a commercial or non-commercial nature, via text messages (SMS and/or MMS) or through any other analogue and/or digital communication medium created or to be created, to the physical, electronic, cellular, or mobile device address, with the purpose of promoting, inviting, directing, executing, informing, and in general, carrying out commercial or advertising campaigns, promotions, or contests, carried out by RUEDATA S.A.S and/or by third parties; g) To develop the section, evaluation and labor linkage process; h) To support internal or external audit processes; i) To register the information of employees and/or pensioners (active and inactive) in the RUEDATA S.A.S. databases; j) Those indicated in the authorization granted by the data subject or described in the respective privacy notice, as the case may be.

If a personal data is provided, said information will be used only for the purposes stated herein, and therefore, RUEDATA S.A.S will not proceed to sell, license, transmit, or disclose it, except that: (i) There is express authorization to do so; (ii) It is necessary to allow contractors or agents to provide the services entrusted to them; (iii) It is necessary in order to provide our services and/or products.; (iv) It is necessary to disclose it to

	Data processing policy			
	RUEDATA			
	Preparation: Legal Department	Date: 01/01/23	Version: 01	Validity: 01/01/26

entities that provide marketing services on behalf of RUEDATA S.A.S or to other entities with which joint market agreements are in place; (v) The information is related to a merger, consolidation, acquisition, divestiture, or other restructuring process of the company; (vi) It is required or permitted by law.

RUEDATA S.A.S may subcontract third parties to process certain functions or information. When third parties are actually subcontracted to process personal information or personal information is provided to third-party service providers, RUEDATA S.A.S will warn such third parties of the need to protect such personal information with appropriate security measures, the use of the information for their own purposes is prohibited, and it is requested that the personal information not be disclosed to others.

VI. AUTHORIZED METHODS OF PERSONAL DATA COLLECTION


he literal c) of Article 3 of Law 1581 of 2012 defines personal data as any information linked or that can be associated with one or more specific or determinable natural persons.

Indeed, constitutional jurisprudence has clarified that the characteristics of personal data are as follows: i) being related to exclusive and inherent aspects of a natural person, ii) allowing the identification of the person, to a greater or lesser extent, through an overview achieved with it and other data; iii) its ownership resides exclusively in the data subject, a situation that is not altered by its lawful or unlawful acquisition by a third party, and iv) its processing is subject to special rules (principles) regarding its collection, management, and disclosure.

Therefore, the collection of the required information may be carried out through any of the following means, but not limited to: (i) physical written forms; (ii) electronic written forms; (iii) authorized voice recordings; (iv) authorized video recordings; (v) any analogous technical means that capture and/or record images, among others.

VII. RIGHTS OF THE HOLDERS OF PERSONAL DATA SUBJECT TO PROCESSING BY RUEDATA S.A.S.

The holders of personal data, either directly or through their representative, attorney-in-fact, or heir, may exercise the following rights regarding the personal data processed by RUEDATA S.A.S:

	Data processing policy			
	RUEDATA			
	Preparation: Legal Department	Date: 01/01/23	Version: 01	Validity: 01/01/26


- a) Right of Access: Under this right, the data subject may access the personal data under the control of RUEDATA S.A.S, for the purpose of consulting them free of charge at least once every calendar month, and each time there are substantial modifications to the Information Processing Policies that warrant new inquiries;
- b) Right to update, rectify, and delete: Under this right, the data subject may request the updating, rectification, and/or deletion of the personal data being processed, so that the purposes of the processing are fulfilled;
- c) Right to request proof of authorization: Except in cases where, according to current legal norms, authorization is not required for the processing;
- d) Right to be informed about the use of personal data;
- e) Right to file complaints with the Superintendence of Industry and Commerce: for violations of the current regulations on the processing of personal data;
- f) Right to require compliance with orders issued by the Superintendence of Industry and Commerce.

FIRST PARAGRAPH: For the exercise of the rights described above, both the data subject and the person representing them must prove their identity and, if applicable, the capacity under which they represent the data subject.

SECOND PARAGRAPH: The rights of minors will be exercised through the individuals authorized to represent them.

VIII. OBLIGATIONS OF RUEDATA S.A.S.

- a) Request and retain, under the conditions outlined in this policy, a copy of the respective authorization granted by the data subject.
- b) Clearly and sufficiently inform the data subject about the purpose of the collection and the rights granted to them by virtue of the granted authorization.
- c) Inform, upon request of the data subject, about the use given to their personal data.

	Data processing policy			
	RUEDATA			
	Preparation: Legal Department	Date: 01/01/23	Version: 01	Validity: 01/01/26

- d) Process queries and complaints submitted in accordance with the terms outlined in this policy.
- e) Ensure compliance with the principles of truthfulness, quality, security, and confidentiality as established in the following policy.
- f) Preserve information under the necessary security conditions to prevent its alteration, loss, consultation, unauthorized or fraudulent use, or access.
- g) Update information when necessary.
- h) Rectify personal data when applicable.
- i) Comply with the instructions and requirements issued by the Superintendence of Industry and Commerce.


IX. PRESERVATION AND STORAGE OF DATA

The Data Subject expressly authorizes RUEDATA to store their personal data in the manner and with the security measures deemed most convenient and appropriate. RUEDATA's security measures aim to protect the data of the Data Subjects to prevent its tampering, loss, unauthorized use, and access.

To achieve this, RUEDATA diligently implements human, administrative, and technical protection measures that are reasonably within its reach. The Data Subject expressly accepts this form of protection and declares it to be convenient and sufficient for all purposes.

X. REQUEST FOR AUTHORIZATION TO THE PERSONAL DATA SUBJECT

Prior to or at the time of collecting personal data, RUEDATA will request the data subject's authorization for its collection and processing. RUEDATA will clearly state the purpose for which the data is requested, employing automated technical means, written, or oral methods that allow for the preservation of proof of authorization and/or unequivocal conduct, as described in Article 7 of Decree 1377 of 2013. This authorization will be sought for a period of **four (4) years** or a reasonable and necessary time to meet the needs that prompted the data request. In any case, it will adhere to the legal provisions governing the matter.

	Data processing policy			
	RUEDATA			
	Preparation: Legal Department	Date: 01/01/23	Version: 01	Validity: 01/01/26

XI. PRIVACY NOTICE

In the event that RUEDATA S.A.S cannot make this information processing policy available to the data subject, it will publish the privacy notice attached to this document. The text will be preserved for later consultation by the data subject and/or the Superintendence of Industry and Commerce.

XII. TEMPORARY LIMITATIONS ON THE PROCESSING OF PERSONAL DATA


RUEDATA S.A.S may only collect, store, use, or circulate personal data for a period of four years or the time that is reasonable and necessary, according to the purposes that justified the processing, taking into account the applicable provisions in the relevant field and the administrative, accounting, tax, legal, and historical aspects of the information. Once the purposes of the processing have been fulfilled and without prejudice to legal norms that stipulate otherwise, the personal data in its possession will be deleted. However, personal data must be retained when required for compliance with a legal or contractual obligation.

XIII. RESPONSIBLE AREA AND PROCEDURE FOR EXERCISING THE RIGHTS OF THE DATA SUBJECT

The LEGAL DEPARTMENT will be responsible for addressing the requests, complaints, and claims made by the data subject in the exercise of the rights outlined in section 3 of this policy, with the exception described in its letter e). For these purposes, the data subject or their representative may send their request, complaint, or claim from Monday to Friday from 8:30 a.m. to 5:30 p.m. to the email legal@ruedata.com.

The request, complaint, or claim must contain the identification of the Data Subject, a description of the facts giving rise to the claim, the address, and accompanying the documents that they wish to assert. If the claim is incomplete, the interested party will be required within five (5) days following the receipt of the claim to remedy the deficiencies. After two (2) months from the date of the request, if the applicant has not provided the requested information, it will be understood that they have withdrawn the claim.

XIV. PROCEDURE FOR SUBMITTING QUERIES, REQUESTS OR REQUESTS IN RELATION TO THE PROCESSING OF PERSONAL DATA

	Data processing policy			
	RUEDATA			
	Preparation: Legal Department	Date: 01/01/23	Version: 01	Validity: 01/01/26


If you wish to exercise your rights to request modifications, deletion, rectification or others, the Holder must send an email or physical mail to the contact addresses established in this Privacy Policy. The procedure that will be followed for these communications will be as follows:

14.1. When the data holder or their heirs wish to consult the information that is stored in the database, RUEDATA will respond to the request within a maximum of ten (10) business days. In compliance with the provisions of Law 1581 of 2012, when it is not possible to attend the consultation within said term, the Holder will be informed, the reasons for the delay will be expressed and the date on which his consultation will be attended will be indicated, which may not exceed five (5) business days following the expiration of the first term.

14.2. Revocation of authorization, withdrawal or suppression of the Database and claims on Personal Data

When the data holder or their heirs consider that the information contained in the databases should be subject to correction, updating or suppression, or when they notice the alleged non-compliance with any of the duties contained in Law 1581 of 2012, they may file a claim with RUEDATA, which will be processed under the following rules:

- The claim will be filed by means of a request addressed to RUEDATA, with the identification of the Holders, the description of the facts that give rise to the claim, the address, and the documents that are to be invoked will be attached. If the claim is incomplete, RUEDATA may request the interested party within the five (5) days following receipt of the claim to remedy the failures. If two (2) months have elapsed since the date of the request, without the applicant submitting the requested information, it will be understood that he has desisted from the claim. In the event that RUEDATA is not competent to resolve the claim, it will transfer it to the competent authority within a maximum of two (2) business days and inform the Holder of the situation, with which it will be relieved of any claim or liability for the use, rectification or suppression of the data.
- Once the complete claim has been received, when it cannot be resolved expeditiously and provided that it is technically feasible, a legend will be

	Data processing policy			
	RUEDATA			
	Preparation: Legal Department	Date: 01/01/23	Version: 01	Validity: 01/01/26

included in the database that says "claim in progress" and the reason for it, within a period of no more than two (2) business days. Said legend must be maintained until the claim is decided.


- The maximum term to attend to the claim will be fifteen (15) business days counted from the day following the date of its receipt. When it is not possible to attend the claim within said term, the Holder will be informed of the reasons for the delay and the date on which his claim will be attended, which in no case may exceed eight (8) business days following the expiration of the first term. The withdrawal or suppression will not proceed when there is a contractual or legal obligation to remain in the database of RUEDATA, such as, for example, for the fulfillment of accounting, tax, commercial or legal obligations.
- In the event that the person receiving the claim is not competent to resolve it, they will transfer it to the competent authority within a maximum of two (2) business days and inform the interested party of the situation. Once the complete claim has been received, a legend will be included in the database that says "claim in progress" and the reason for it, within a period of no more than two (2) business days. Said legend must be maintained until the claim is decided.

The maximum term to attend the claim will be ten (10) business days counted from the day following the date of its receipt. When it is not possible to attend the claim within said term, the interested party will be informed of the reasons for the delay and the date on which his claim will be attended, which in no case may exceed five (5) business days following the expiration of the first term.

XV. SECURITY MEASURES

In accordance with the security principle established in Law 1581 of 2012, RUEDATA S.A.S will implement the technical, human, and administrative measures necessary to ensure the security of records, preventing their alteration, loss, consultation, unauthorized or fraudulent use, or access. The personnel responsible for processing personal data will execute the established protocols to guarantee the security of the information.

XVI. DURATION, VERSIONS, AND UPDATING OF THE POLICY

	Data processing policy			
	RUEDATA			
	Preparation: Legal Department	Date: 01/01/23	Version: 01	Validity: 01/01/26

This Personal Data Processing Policy is effective upon its signing and complements associated policies, with an indefinite term. Any substantial changes to the Personal Data Processing Policies will be promptly communicated to the data subjects through usual contact methods and/or the website: <https://ruedata.com>.

For data subjects without access to electronic means or those unreachable by such means, notifications will be posted through open notices at the company's main office. This policy will have a summarized version made available to the general public and users of the Entity's services, in compliance with the provisions of Law 1582 of 2012, regulatory decrees, and other relevant and current norms.

DATA PROTECTION PROCEDURE MANUAL

I. OBJECTIVE

This manual aims to establish guidelines for the implementation, monitoring, sustainability, and continuous improvement of the privacy policy and data processing at Ruedata S.A.S.


II. SCOPE

Ruedata S.A.S, identified with NIT. 901.132.481-4, with its main office in Bogotá D.C., at Calle 127D # 19-18, hereinafter referred to as "Ruedata," in the role of data controller or processor, is committed to the proper processing of data. Therefore, this document outlines the procedures and activities involving the processing of personal data, aligned with the regulations and guidelines governing it.

III. PRINCIPLES APPLICABLE TO DATA PROCESSING

Ruedata ensures compliance with the following principles, which are aligned with those established in Article 4 of Law 1581 of 2012:

1. **Legality:** Throughout the personal data processing, from capture to storage and deletion, compliance with normative provisions is mandatory. Data must be used for purposes within the law and regulatory provisions that develop it.

	Data processing policy			
	RUEDATA			
	Preparation: Legal Department	Date: 01/01/23	Version: 01	Validity: 01/01/26

2. **Purpose:** All collected personal data must serve specific purposes in accordance with the intended data processing.
3. **Freedom:** The collection, storage, and processing of personal data can only be done with the prior and express authorization of the data subject, who must be informed about the processing of their personal data. The disclosure or sharing of personal data without prior authorization or without legal authorization is prohibited.
4. **Quality:** Ruedata must promote that personal data subject to processing must be truthful, accurate, complete, and up-to-date; otherwise, errors in the processing for which they were captured may occur.
5. **Restricted Access and Circulation:** The processing of personal data may only be carried out by those expressly authorized by the data subject or individuals enabled by current legal provisions.
6. **Security:** All information associated with personal data processed by Ruedata must be protected under adequate security standards. Operational, technical, and human measures must be implemented to prevent loss, tampering, or unauthorized access.


IV. GENERAL PROVISIONS FOR OBTAINING AUTHORIZATION

Any capture, collection, use, and storage of personal data by Ruedata in the course of its activities and for the purposes specified in the Personal Data Protection Policy requires free, prior, express, unequivocal, and informed consent from the data subjects.

To this end, Ruedata has made available to data subjects the authorization for the processing of their personal data in various scenarios where data is captured, both physically and digitally. This is done through coverage in authorization models or privacy notices informing data subjects about the capture of their personal data, the intended processing, including purposes, their rights, channels for exercising their rights, and information related to the Personal Data Protection Policy.

In all cases, obtaining authorization will be done under the different modalities established by law, taking into account the nature of each data capture channel and the way in which the information is obtained—whether through a written channel, a verbal one, or through unequivocal conduct.

It is essential to consider that, in all cases, Ruedata must safeguard the authorizations obtained for personal data processing, as they constitute evidence required by the


	Data processing policy			
	RUEDATA			
	Preparation: Legal Department	Date: 01/01/23	Version: 01	Validity: 01/01/26

Superintendence of Industry and Commerce. Therefore, physical authorization formats, call records, or web form records that provide traceability of the acceptance of processing must be retained. The documentary retention of authorizations will be aligned with Ruedata's Document Retention Tables according to the type of document containing them or associated with them.

V. AUTHORIATION IN FORMATS

Authorization models for the processing of personal data can be processed through web forms or physical documents.

1. Authorization in wed formats: Areas that, in the exercise of their functions or due to initiatives involving the collection of personal data through web forms, should consider the following necessary aspects for their capture:
 - a. Request only the personal data necessary according to the purpose of the processing.
 - b. Include in the format a privacy notice that incorporates the authorization of data processing by the data subject.
 - c. The submission of information through the form should be conditioned on the prior acceptance of the data processing authorization.
 - d. Validate that the privacy notice includes all processing purposes associated with the collection of personal data.
 - e. Ensure that the platform supporting the web form has the technical, operational, and security capacity to store authorizations and to trace them. It is preferable to include the date on which the authorization was obtained.
2. Authorization in physical formats: Areas conducting initiatives involving the collection of personal data through physical forms should consider the following aspects:
 - a. Request only the necessary personal data according to the purpose of the capture.
 - b. Include in the format a privacy notice that incorporates the authorization for data processing.

	Data processing policy			
	RUEDATA			
	Preparation: Legal Department	Date: 01/01/23	Version: 01	Validity: 01/01/26

- c. For Ruedata to process the data captured in the form, the data subject must give authorization. In the event that the data subject has not authorized, it should be analyzed independently.
- d. Ensure that the privacy notice includes all processing purposes associated with the requested data capture.
- e. Guarantee the custody of the forms with their respective authorizations.

VI. CUSTODY OF AUTHORIZATION

When Ruedata engages in active processing of personal data, it must ensure the custody and storage of the authorization for data processing. Likewise, these authorizations must be made available to the Superintendence of Industry and Commerce or the Data Protection Officer if they require them.

VII. PROOF OF AUTHORIZATION

Ruedata will take the necessary measures to maintain records or suitable technical or technological mechanisms of when and how it obtained authorization from data subjects for the processing of their data.


VIII. CASES WHERE AUTHORIZATION IS NOT REQUIRED

There are cases where it is not necessary to request the authorization of the data subject for collection or circulation, respectively, either because:

- 1. There is a legal provision that requires the request for such data or personal information.
- 2. When it is the legal representative of a minor and requests such information, and respects the best interests of the adolescent.
- 3. When it involves public personal data.
- 4. In cases of medical or health emergencies.
- 5. When it concerns personal data related to civil registration.

IX. PROCESSING OF PERSONAL DATA OF CHILDREN AND ADOLESCENTS

The processing of personal data of children and adolescents is prohibited, except when it comes to data of a public nature, in accordance with the provisions of Article 7 of

	Data processing policy			
	RUEDATA			
	Preparation: Legal Department	Date: 01/01/23	Version: 01	Validity: 01/01/26

Law 1581 of 2012, and when such processing meets the following parameters and requirements:

1. It must respond to and respect the best interests of children and adolescents.
2. It must ensure the respects f their fundamental rights.

Once these requirements are met, the legal representative of the child or adolescent will grant authorization after the minor has exercised their right to be heard, an opinion that will be considered taking into account maturity, autonomy, and the ability to understand the matter.

Ruedata, as a Responsible and Processor involved in the processing of personal data of children and adolescents, will ensure their appropriate use. To this end, it will apply the principles and obligations established in Law 1581 of 2012, Decree 1377 of 2013, and other complementary regulations.

X. COLLECTION OF SENSITIVE PERSONAL DATA


Sensitive personal data is information that, by its nature, can affect the privacy of the data subject or be used to discriminate against them. Therefore, its processing requires greater care and protection. The collection of sensitive personal data must adhere to the following rules:

1. Sensitive personal data should only be collected when strictly necessary for the effective provision of the service provided by Ruedata.
2. When data is requested in a physical format, spaces should be provided where it is indicated that providing information on such data is not mandatory.
3. When sensitive personal data is requested in a digital form, the employee making the request should verify that checkboxes for questions regarding sensitive data are not marked as mandatory.
4. In cases where the law requires the collection of sensitive personal data, the checkboxes must also be filled in as mandatory.

XI. LIMITATIONS ON THE USE OF SENSITIVE PERSONAL DATA

1. The use of sensitive personal data must strictly adhere to the purposes stated in the authorization for the processing of personal data.
2. In the event of a new use of the collected sensitive personal data, Ruedata must request a new authorization for the processing of personal data.

XII. EFFECTIVE DATE

	Data processing policy			
	RUEDATA			
	Preparation: Legal Department	Date: 01/01/23	Version: 01	Validity: 01/01/26

This Manual is effective from June 1, 2023.

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ANNEX 1. PRIVACY NOTICE FOR WEBSITE AND SAAS

PRIVACY NOTICE

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