



**P-TDP-1
V.2**

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Aware of the importance of protecting and handling personal information provided by data subjects properly, ANGLOSERVICIOS S.A.S., acting as the data controller, has prepared these data protection policy and procedures.


PRIVACY AND PERSONAL DATA PROCESSING POLICY

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1. INTRODUCTION

ANGLOSERVICIOS S.A.S. guarantees the protection and privacy of the personal data of customers, suppliers, contractors, and employees in compliance with the provisions of articles 15 and 20 of the Political Constitution of Colombia, the Statutory Law 1581 of 2012, and Decree 1377 of 2013.

Through this policy, ANGLOSERVICIOS S.A.S. responds to the fundamental right to habeas data that all citizens have to know, update and rectify their existing personal data in databases and provided files. Therefore, ANGLOSERVICIOS S.A.S. as the CONTROLLER in charge of personal data processing makes this document public.

The provisions of this personal data processing policy are of mandatory compliance for ANGLOSERVICIOS S.A.S., its managers, employees, contractors, and third parties with whom it establishes relations of any nature.

2. OBJECTIVE


To guarantee the confidentiality and the security regarding the treatment of all customers', suppliers', employees', and third parties' data from whom ANGLOSERVICIOS S.A.S. has legally obtained information and personal data in accordance with the guidelines established by law.

3. TERMS AND DEFINITIONS

- **Authorization:** Prior, express, and informed consent of the data subject to process their data. This may be written, verbal, or through unequivocal conduct that allows to reasonably conclude that the data subject granted authorization.
- **Database:** Organized set of Personal Data that is subject to electronic or non-electronic processing, whatever the modality of their formation, storage, organization, and access.
- **Personal data:** Any information related to one or several identified or identifiable natural persons. These data are classified as sensitive, public, private, and semi-private.
- **Sensitive personal data:** Information that affects the privacy of the person or whose improper use may generate discrimination, such as that which reveals racial or ethnic origin, political orientation, religious or philosophical beliefs, membership in trade unions, social organizations, human rights organizations or organizations that promote the interests of any political party or that ensure the rights and guarantees of opposition political parties, as well as data related to health, sex life and biometric data (fingerprints, among others).
- **Public personal data:** Data qualified as such according to the mandates of the law or the Political Constitution and all those that are not semi-private or private. The data contained in the following documents is public, among others: public documents, public records, gazettes and official bulletins, information related to official records and duly executed court rulings that are not subject to confidentiality, information related to the civil status of persons, their profession or trade, and their status as merchants or public servants. The existing personal data in the commercial registry of the Chambers of Commerce are public (Article 26 of the Code of Commerce).

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Likewise, public data are those which, by virtue of a decision of the data subject or a legal mandate, are in files of free access and consultation. This data may be obtained and offered without any reservation whatsoever and regardless of whether it refers to general, private, or personal information.


- **Private personal data.** Refers to data that is only relevant to the person who owns it, due to its intimate or reserved nature. Examples: merchants' books, private documents, information extracted from a residence inspection.
- **Semi-private personal data.** Semi-private data is data that is not of an intimate, reserved, or public nature and whose knowledge or disclosure may be of interest not only to its owner but also to a certain sector or group of persons or society in general, such as data concerning the fulfillment or non-fulfillment of financial obligations or data concerning to relations with social security entities, among others.
- **Data Controller:** Person who decides on the database and/or the processing of data on his/her own account or in association with others.
- **Data processor:** Person who carries out data processing on behalf of the data controller.
- To be "**Authorized**", is ANGLOSERVICIOS S.A.S. and all the persons under its responsibility, who by virtue of the authorization and the Policy have the legitimacy to submit to processing the personal data of the data subject. Being Authorized includes those individuals referred to as Enabled.
- "**Enabling**" or being "**Enabled**", is the legitimization expressly and in writing by contract or by any document that takes its place, grants ANGLOSERVICIOS S.A.S. to third parties, in compliance with applicable law, for the processing of personal data, making such third parties responsible for the processing of personal data provided or made available.
- **Claim:** Request by the data subject or by the persons he/she has authorized or by law, to correct, update or delete their personal data or when they notice that there is an alleged breach of the data protection regime, pursuant to Article 15 of Law 1581 of 2012.
- **Data subject:** The natural person/legal entity to whom the information refers.
- **Processing:** Any operation or set of operations on personal data such as, among others, the collection, storage, use, circulation, or deletion of such data.
- **Transmission:** Processing of personal data that involves the communication of such data within (national transmission) or outside Colombia (international transmission) and that has as its purpose carrying out a processing operation by the processor on behalf of the controller.
- **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, which in turn is responsible for the processing and is located inside or outside the country.
- **Procedural requirement:** The data subject or assignee may only file a complaint before the Superintendence of Industry and Commerce once the consultation or complaint process has been exhausted before the data controller or data processor, according to Article 16 of Law 1581 of 2012.

4. IDENTIFICATION OF THE DATA CONTROLLER

ANGLOSERVICIOS S.A.S. is a company that is constituted by official interpreters and translators who are registered under the Ministry of Foreign Affairs of Colombia and professionals in the area

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of philology and languages, with a specialization in the translation and interpretation of languages. Its basic contact information is described below:

Address: Calle 128 Bis # 58b-05, Bogotá, Colombia.

Email: contacto@angloservicios.com

Phone: +57 3132678545

Website: www.angloservicios.com

5. RIGHTS AND DUTIES FOR THE PROCESSING OF PERSONAL DATA.


5.1. Rights of data subjects

In accordance with the legal provisions in force, the following rights are described for personal data subjects:

- To know, update, rectify and consult their personal data at any time before ANGLOSERVICIOS S.A.S. concerning the data that they consider partial, inaccurate, incomplete, fractioned, and those that induce error.
- To request proof of the authorization granted to ANGLOSERVICIOS S.A.S. at any time, except in those cases in which the controller is legally released from having the authorization to process the data of the data subject.
- Be informed by ANGLOSERVICIOS S.A.S., upon prior request of the data subject, regarding the use that will be made of the data.
- To file the complaints it deems pertinent to enforce their right to Habeas Data, before the Superintendence of Industry and Commerce.
- To revoke the authorization and/or request the deletion of any data when he/she considers that ANGLOSERVICIOS S.A.S. has not respected their constitutional rights and guarantees.
- To freely access the personal data that they voluntarily choose to share with ANGLOSERVICIOS S.A.S.

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5.2. Rights of children and adolescents.

ANGLOSERVICIOS S.A.S. will ensure respect for the prevailing rights of children and adolescents in the processing of data.

Likewise, ANGLOSERVICIOS S.A.S. will require the legal representative or guardian of the child or adolescent to provide the authorization of the minor, before the minor gives his/her opinion regarding the treatment that will be given to his/her data. This opinion will be evaluated by taking into account the individual's maturity, autonomy, and capacity to understand the matter. ANGLOSERVICIOS S.A.S. and any person involved in the processing of personal data of children and adolescents shall ensure the proper use of such data. For the fulfillment of this purpose, the principles and obligations established in Law 1581 of 2012, Decree 1377 of 2013, and Decree 886 of 2014 are applied and developed.

5.3. Duty to notify the data subject.

At the time of requesting the data subject's authorization for the processing of data, ANGLOSERVICIOS S.A.S. shall clearly and expressly inform the following:

- The processing to which their personal data will be subjected and the purpose of this.
- The optional nature of the response to the questions asked when these are related to sensitive data or the data of children and adolescents.
- The rights they are entitled to as Data Subjects.
- The identification, physical or electronic address, and telephone number of ANGLOSERVICIOS S.A.S.


5.4. Duties of the data controller

ANGLOSERVICIOS S.A.S. complies with the following duties for data processing:

- To guarantee the data subject the full and effective exercise of the right to habeas data, at all times.
- To request and keep a copy of the corresponding authorization granted by the data subject.
- To duly inform the data subject about the purpose of the collection and the rights he/she has by virtue of the granted authorization.
- To keep the information under the necessary security conditions to prevent its adulteration, loss, consultation, use, or unauthorized or fraudulent access.
- To process the queries and claims formulated under the terms set forth in this policy.
- To inform, upon request of the data subject, about the use given to their data.
- To inform the data protection authority when there are violations of the security codes and there are risks in the administration of the information of the data subjects.
- To comply with the instructions and requirements issued by the Superintendence of Industry and Commerce.

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5.5. Duties of data processors

- To update, rectify or delete data under the terms of this policy, in a timely manner.
- To update the information reported by the data controllers within five (5) working days from the date of receipt.
- To refrain from circulating information that is being disputed by the data subject and whose blocking has been ordered by the Superintendence of Industry and Commerce.
- To allow access to information only to those who have the right to access it.
- To inform the Superintendence of Industry and Commerce when there are violations of the security codes and there are risks in the administration of the information of the data subjects.

6. TYPE, PROCESSING, AND SCOPE OF DATA PROTECTION.

6.1. Types of sources for data processing.

The information or personal data that ANGLOSERVICIOS S.A.S. collects for the management of this policy are the following:


- **Natural Person:** Names and surnames, type of identification, identification number, gender, marital status, date of birth, e-mail, financial data (bank accounts), and academic information, among other information contained in documents received for translation processes.
- **Legal entity:** Company name, tax identification number, address, landline, cell phone, e-mail, country, city, and/or financial data (bank accounts).
- **Request for quotation:** Names, surnames, telephone numbers, city, and e-mail address.
- **Quotations:** Name, phone number, e-mail, language to be translated, date, number of days, number of hours, number of words to be translated.
- **Biometric data:** Images, video, audio, fingerprints that identify or make our customers identifiable, users, or any person who enters, is within, or transits anywhere within the facilities of ANGLOSERVICIOS S.A.S., as long as the devices that capture such information are implemented.

This data may be stored and/or processed in servers located in data processing centers; either our own or contracted with suppliers located in different countries, which is authorized by our customers/users by accepting this policy of processing and protection of personal data.

ANGLOSERVICIOS S.A.S. reserves the right to improve, update, modify, delete any information, content, domain, or subdomain that may appear on the website, without any obligation of prior notice, being understood as sufficient with the publication on the websites of ANGLOSERVICIOS S.A.S. for the solution of legal or internal requests and the provision or offering of new services or products.

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6.2. Scope of personal data collection.

6.2.1. Data collected from customers:

ANGLOSERVICIOS S.A.S. informs the data subjects that the data collected from our customers, contractors and suppliers may be used for the following purposes:

- The substantiation of the contractual relationship established with ANGLOSERVICIOS S.A.S.
- The fulfillment of all activities related to the service.
- To send information about changes in the conditions of the purchased services and products, and to notify individuals about new services.
- To manage requests, clarifications, and inquiries.
- To prepare studies and programs that are necessary to determine consumption habits.
- The fine-tuning of security filters and business rules in commercial transactions; confirming, processing such transactions, with financial institutions, with service providers, and individuals.
- To conduct periodic evaluations of our services to improve quality.
- The sending, by traditional and electronic means, of the technical, operational, and commercial information of services offered by ANGLOSERVICIOS S.A.S., its associates or suppliers, at present and in the future.
- To request satisfaction surveys, which individuals are not obliged to answer.
- To carry out the transmission and/or transfer of data to other companies, commercial alliances, or third parties in order to comply with the acquired obligations. The transmission and transfer may even be made to third countries that may have a different level of protection with respect to that of Colombia, when necessary for the fulfillment of our obligations.
- To comply with obligations undertaken by ANGLOSERVICIOS S.A.S. with its customers at the time of acquiring services.
- To respond to inquiries, requests, complaints, and claims made by control bodies and other authorities that by virtue of the applicable law must receive personal data.
- Any other activity of a similar nature to those described above, which could be necessary to carry out the corporate purpose of ANGLOSERVICIOS S.A.S.


The processing may be carried out directly by ANGLOSERVICIOS S.A.S. or through its contractors, consultants, advisors, and/or third parties in charge of the processing of personal data, to carry out any operation or set of operations such as the collection, storage, use, circulation, deletion, classification, transfer, and transmission (the "Processing") on all or part of individuals' personal data.

6.2.2. Data collected from our employees:

- To comply with the obligations contracted by ANGLOSERVICIOS S.A.S. with the workers who hold the information, in relation to the payment of salaries, social benefits, and others enshrined in the employment contract and labor regulations in force.

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- To inform the employee of any modifications that may occur during the development of the employment contract and until after its termination.
- To conduct internal studies on the habits of the worker who owns the information or to request personal information for the development of programs or management systems.
- To make the payroll deductions authorized by the employee.
- To manage requests, activity administration, clarifications, and investigations.
- The sending, by traditional and electronic means, of technical, operational, and commercial information on products and services offered by partners or suppliers, now and in the future.
- To prepare studies and programs needed to determine consumption habits.
- To carry out the transmission and/or transfer of data to other companies, commercial alliances, or third parties in order to comply with the acquired obligations. The transmission and transfer may even be made to third countries that may have a different level of protection with respect to that of Colombia, when necessary for the fulfillment of our obligations.
- The request for surveys, which the employee is not obliged to answer.
- To transfer, either by way of transmission or transfer, the received information, to all judicial and/or administrative entities when necessary for the fulfillment of duties as the employer in order to comply with its own labor, social security, pension, professional risks, family compensation funds (*Sistema Integral de Seguridad Social*) and tax obligations.
- Transferring the employer's personal information to third parties who legitimately have the right to access such information.
- To deliver either by way of transmission or transfer the employee's personal information to all entities that are related to the compliance of the controller in its capacity as an employer.
- Any other activities of a similar nature to those described above, which are necessary to develop the corporate purpose of ANGLOSERVICIOS S.A.S. and its labor obligations acquired by virtue of the execution of the employment contract or by operation of law.

6.3. Processing of personal data


The processing of personal data will be carried out with the prior authorization of the data subject, except in the events in which the data is public. For this purpose, a section for the authorization and processing of data has been implemented in the Quotation Form for legal entities and the Quotation Template for natural persons, which will be accepted by the data subject at the very moment he/she accepts the conditions of the commercial offers.

This authorization explains the scope and purposes of the processing of personal data, alludes to the authorization by another person, the data of minors and sensitive data, and also defines the attention channel of data subjects who wish to exercise their rights under the habeas data, and indicates the place in which this policy is located. To process the data, ANGLOSERVICIOS S.A.S. employs all activities aimed at preserving the confidentiality of the information.

The authorization will be obtained through any means that may be subject to subsequent consultation, such as the web page, forms, formats, face-to-face activities, or through social networks, etc. Authorization may also be obtained from unequivocal conduct of the data subject that allows to reasonably conclude that he/she granted authorization for the processing of his/her information.

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If you provide us with personal information about a person other than yourself, such as your spouse, family members, or a co-worker, among others, we understand that you have the authorization of such person to provide us with their data; and we do not verify, nor do we assume the obligation to verify the identity of the user/customer, nor the veracity, validity, sufficiency, and authenticity of the data of each of them. In virtue of the above, we do not assume responsibility for damages or losses of any nature that could have originated in the lack of veracity, homonymity, or identity impersonation.

The Personal Data collected will be subject to manual or automated processing and incorporated into the corresponding files or databases (hereinafter, the "File") of ANGLOSERVICIOS S.A.S., either as a data processor or controller for data protection. To determine the termination of the processing, the rules applicable to each purpose and the administrative, accounting, tax, legal and historical aspects of the information will be considered.

ANGLOSERVICIOS S.A.S. has adopted the legally required levels of security for the protection of personal data and has installed all the technical means and measures at its disposal to prevent the loss, misuse, alteration, unauthorized access, and illegitimate theft of personal data provided to ANGLOSERVICIOS S.A.S. However, the data subject must be aware that security measures on the Internet are not unbreakable.

If you choose to delete your information, to the extent permitted by law, we will retain certain personal information in our files for the purposes of accounting and tax identification of transaction data, fraud prevention, dispute resolution, investigating disputes or incidents, enforcing our terms and conditions of use, and complying with legal requirements.

6.3.1. National or international transfer of personal data

ANGLOSERVICIOS S.A.S. may transfer data to other data controllers when authorized by the data subject, by law, or by an administrative or judicial mandate.

6.3.2. International and national transmission of entrusted data

ANGLOSERVICIOS S.A.S. will be able to send or transmit data to one or several processors located inside or outside the Republic of Colombia in the following cases:

- a) When it has the authorization of the data subject and b) when, without having this authorization, there is a data transmission contract between the data controller and the processor.


7. COMPUTER SECURITY.

ANGLOSERVICIOS S.A.S. informs the risks of computer security that must be taken into account when making transactions on the Internet:

- a. A user may be swindled via e-mail or some DNS server deception, to visit a fake site with the same design, but where the credit/debit card data is loaded into the fake system, stealing

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information from the cardholder. Therefore, it is important to make transactions directly through known domains to reduce risks.

- b. The computer where the user is performing the transaction may have some spyware or malicious software installed without prior knowledge, that captures everything typed on the keyboard or captures information from input devices and sends it to a network or host on the Internet. Therefore, it is recommended that the transaction be made on a home or office computer, if possible.
- c. The data subject could be impersonated and the information could be used by a third party.
- d. It is recommended that the computer where you perform electronic transactions has an updated and active antivirus to mitigate the risks of fraud.

If the personal information was collected or provided and you did not express your opposition to the transfer of your personal data, it is understood that you have given your consent. If you wish to ratify your consent or express your refusal, you can state so through the following email contacto@angloservicios.com.

8. REQUESTS, COMPLAINTS, OR CLAIMS

To receive requests, complaints, and inquiries related to the handling and processing of personal data, ANGLOSERVICIOS S.A.S. has assigned the e-mail address contacto@angloservicios.com to channel, study and answer the requests, complaints, or claims. Therefore, you may send your requests to this address, which will be treated under the provisions of Law 1581 of 2012.

8.1. Queries.

The data subjects or their assignees may consult the personal information of the data subject that is in our database. ANGLOSERVICIOS S.A.S. will provide them with all the information contained in the individual record or that is linked to the identification of the data subject.

The consultation will be answered within a maximum term of ten (10) business days from the date of receipt. When it is not possible to answer the consultation within such term, the interested party will be informed and the date on which the consultation will be answered will be indicated, which in no case may exceed five (5) business days following the expiration of the first term.

8.2. Claims.

The data subject or his assignees who consider that the information contained in a database should 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 ANGLOSERVICIOS S.A.S., which will be processed under the following rules:

- The claim shall be formulated through a request addressed to ANGLOSERVICIOS S.A.S. with the identification of the data subject, the description of the facts that give rise to the claim, the

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address, and accompanying documents to be asserted. If the claim happens to be incomplete, ANGLOSERVICIOS S.A.S. will require the interested party to correct the faults within five (5) days following the receipt of the claim. If two (2) months pass from the date of the requirement and the applicant has not submitted the required information, it will be understood that the claim has been withdrawn.

- Once the complete claim has been received, a legend reading "claim in process" and the reason for the claim will be included in the database, within a term no longer than two (2) business days. Said legend shall remain until the claim is decided.
- The maximum term to address the claim will be fifteen (15) business days from the day following the date of receipt. When it is not possible to address the claim within such term, the interested party will be informed and the date on which the claim will be addressed will be indicated, which in no case may exceed eight (8) business days following the expiration of the first term.
- In any case, the data subject or the assignee may only file a complaint before the Superintendence of Industry and Commerce once he/she has exhausted the consultation or claim process before ANGLOSERVICIOS S.A.S.
- The Administrative area is responsible for the reception and processing of complaints.
- The request for deletion of information and revocation of the authorization will not proceed when the data subject has a legal or contractual duty to remain in the database.

8.3. Questions or suggestions.

If you have any questions or queries about the process of collection, processing, or transfer of your personal information, or consider that the information contained in a database should be subject to correction, update or deletion please send us a message to the following email account: contacto@angloservicios.com

For more information about ANGLOSERVICIOS S.A.S., its identity, address, and means of contact can be found at the following website www.angloservicios.com. Terms and conditions applicable to the services and products published can be consulted at any time on this website, as well.

Validity: This Policy is effective as of the date of its publication. Any change in the policy will be informed and published promptly on the website <https://www.angloservicios.com>

9. VERSION MODIFICATIONS CONTROL

CHANGES		
VERSION	DATE	CHANGE DESCRIPTION
01	20/03/2021	Document creation
02	06/05/2022	Document revision

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