	MANUAL FOR DATA MANAGEMENT PERSONAL Revised: General Secretary- Compliance Approved: Presidency	SGC-MAN-001
		Issue No. 02 Date: August 2020
		Page 1 of 18

INTRODUCTION:

The purpose of this manual is to establish the policies and procedures of the internal framework for compliance with the regulations on personal data protection by the companies of GRUPO EMPRESARIAL MINEROS S.A. in Colombia, as defined in the Statutory Law 1581 of 2012 and complementary legislation.

ABOUT US

GRUPO EMPRESARIAL MINEROS S.A., is a Colombian business group with more than 43 years of experience, dedicated to the exploration, exploitation, industrialization and exploitation of renewable and non-renewable natural resources.

The corporate group is made up of a parent company and its subsidiaries, whose general data, as data controllers, are as follows:


Matrix

Identification data: MINEROS S.A.,
NIT 890.914.525-7
Address: Carrera 43A # 14-109, Medellin, Antioquia.
Tel: (4) 266 5757
Web site: www.mineros.com.co
E-mail: gestion.datos@mineros.com.co

Controlled companies:

1. MINEROS ALUVIAL SAS

Identification data: MINEROS ALUVIAL S.A.S.,
NIT 901.218.630-6
Address: Carrera 43A # 14-109, Medellín, Antioquia.
Tel: (4) 266 5757
Web site: www.mineros.com.co

	MANUAL FOR DATA MANAGEMENT PERSONAL Revised: General Secretary- Compliance Approved: Presidency	SGC-MAN-001
		Issue No. 02 Date: August 2020
		Page 2 of 18

E-mail: gestiondatos.aluvial@mineros.com.co

2. NEGOCIOS AGROFORESTALES SAS

Identification data: NEGOCIOS AGROFORESTALES S.A.S.,
NIT 900.349.809-5

Address: Carrera 43A # 14-109, Medellín, Antioquia.


Tel: (4) 266 5757

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E-mail: gestiondatos.agroforestal@mineros.com.co

POLICIES FOR THE MANAGEMENT OF DATABASES IN THE MINEROS GROUP

In developing the corporate purpose of GRUPO EMPRESARIAL MINEROS SA, information has been compiled that is the object of protection of Statutory Law 1581 of 2012 and the complementary regulations that seek to protect the fundamental right of *habeas data*.

	MANUAL FOR DATA MANAGEMENT PERSONAL Revised: General Secretary- Compliance Approved: Presidency	SGC-MAN-001
		Issue No. 02 Date: August 2020
		Page 3 of 18

1. GENERAL DISPOSITION

1.1. OBJECTIVE

The purpose of the Manual is to define a general regulatory framework within which the basic guidelines for the processing of personal data of GRUPO EMPRESARIAL MINEROS S.A. in Colombia are established, including the principles, procedures, policies and security mechanisms for personal data bases and, additionally, the mechanisms for individuals to access them.

GRUPO EMPRESARIAL MINEROS S.A., seeks to build lasting relationships based on trust and compliance with Colombian regulations in force for the protection of the rights of individuals who have relationships with the business group, guiding their actions by their corporate values of honesty, responsibility, respect, simplicity and solidarity.

1.2. SCOPE


These policies shall be complied with by the legal entities that make up GRUPO EMPRESARIAL MINEROS S.A. in Colombia, for the processing of personal data that will be done based on the authorization granted by the owner of the information according to the purpose informed.

The following policies apply to databases managed and approved by the Corporate Group.

1.3. VALIDITY AND UPDATES

The databases will have an indefinite period of validity in accordance with the duration of the corporate purpose of the companies that make up the GRUPO EMPRESARIAL MINEROS S.A., according to the purpose of each database, the data will only be used for the purposes for which they were authorized by their owners, and during the term of the legal relationship. Likewise, the owners of the information may request the revocation of the authorization of treatment and exclusion of their data by means of a request to which the entity will respond in the terms of compliance with the Law.

When the terms of the privacy policies are modified and/or updated and this essentially modifies the legal relationship with the owner of the information, a new authorization will be obtained. For other cases, authorization will be obtained in the manner established for each policy or privacy notice or through the usual means of contact between the company and the owners of the information.

	MANUAL FOR DATA MANAGEMENT PERSONAL Revised: General Secretary- Compliance Approved: Presidency	SGC-MAN-001
		Issue No. 02 Date: August 2020
		Page 4 of 18

Any substantial change in the personal data treatment policies will be communicated in a timely manner to the owners of the data through the usual means of contact and / or through the website. www.mineros.com.co or by email sent to the holders.


1.4. LEGAL FRAMEWORK

The legal framework is focused on the Colombian legislation, with whose compliance the companies of MINEROS S.A. are fully committed, being the basis of this corporate policy and the integral system of personal data management of the companies that make up the business group, as follows:

- a) Political Constitution of Colombia: Articles 15 and 20.
- b) Statutory Law 1266 of 2008.
- c) Law 1273 of 2009.
- d) Statutory Law 1581 of 2012.
- e) Regulatory Decree 1377 of 2013.
- f) Decree 886 of 2014.
- g) Single Regulatory Decree 1074 of 2015.
- h) Title V of the Sole Circular of the Superintendence of Industry and Commerce.
- i) Any other amendments or additions to the aforementioned regulations.

The guiding principles for the processing of personal data regulated in this policy, both for the corporate group and for each of the legal entities that comprise it, are as follows:

- a) Principle of legality in data processing: GRUPO EMPRESARIAL MINEROS S.A., complies with Law 1581 of 2012, insofar as the processing of personal data is a regulated activity that must be subject to the provisions set forth therein and in the other provisions that develop it.
- b) Principle of purpose: GRUPO EMPRESARIAL MINEROS S.A., will treat the data for a legitimate purpose, in accordance with the Constitution and the law, which will be informed to the owner.
- c) Principle of freedom: GRUPO EMPRESARIAL MINEROS S.A. will process personal data with the prior, express and informed consent of the owner. Personal data may not be obtained or disclosed without prior authorization or in the absence of a legal or judicial mandate.
- d) Principle of truthfulness or quality: the information to be processed must be truthful, complete, updated, verifiable and understandable, avoiding the processing of fractioned or misleading data.

	MANUAL FOR DATA MANAGEMENT PERSONAL Revised: General Secretary- Compliance Approved: Presidency	SGC-MAN-001
		Issue No. 02 Date: August 2020
		Page 5 of 18

- e) Principle of transparency: GRUPO EMPRESARIAL MINEROS S.A., knows that the owners of the information have the right to obtain at any time and without restrictions, information about the existence of the data that concern them.
- f) Principle of restricted access and circulation: the treatment is subject to the limits derived from the nature of the personal data, in accordance with the provisions of Law 1581 of 2012 and the Political Constitution. In this sense, the processing may only be carried out by persons authorized by the owner and/or by the persons provided for by law. With the exception of public information, GRUPO EMPRESARIAL MINEROS S.A., will not make personal data available on the Internet or other means of dissemination or mass communication, unless access is technically controllable to provide restricted knowledge only to owners or authorized third parties in accordance with Law 1581 of 2012.
- g) Principle of security: GRUPO EMPRESARIAL MINEROS S.A. shall handle the information subject to processing referred to in Law 1581 of 2012 with the technical, human and administrative measures necessary to provide security to the records, avoiding their adulteration, loss, consultation, use or unauthorized or fraudulent access.
- h) Principle of confidentiality: all persons involved in the processing of personal data that are not of a public nature are obliged to guarantee the confidentiality of the information, even after the end of their relationship with any of the tasks involved in the processing, and may only provide or communicate personal data when this corresponds to the development of the activities authorized in Law 1581 of 2012 and under the terms of the same.


1.5. DEFINITIONS

The definitions herein are taken from Article 3 of Law 1581 of 2012 and Article 3 of Decree 1377 of 2013.

Authorization: prior, express and informed consent of the owner to carry out the Processing of personal data.

Privacy Notice: verbal or written communication generated by the Responsible, addressed to owner for the processing of your personal data, through which you are informed about the existence of the information treatment policies that will be applicable, the way to access them and the purposes of the treatment that is intended to give the data personal.

Database: organized set of personal data that is subject to Treatment.

	MANUAL FOR DATA MANAGEMENT PERSONAL Revised: General Secretary- Compliance Approved: Presidency	SGC-MAN-001
		Issue No. 02 Date: August 2020
		Page 6 of 18

Personal Data: any information linked or that may be associated with one or more determined or determinable natural persons.

Private Data: is that data that due to its intimate or reserved nature is only relevant for the owner of the information.

Public Data: it is the data that is not semi-private, private or sensitive. They are considered data public, among others, the data related to the marital status of the people, their profession or trade and their status as a merchant or public servant. By their nature, public data may be contained, inter alia, in public records, public documents, official gazettes and bulletins and duly executed court judgments that are not subject to confidentiality.

Semi-private Data: it is data that is not intimate, reserved, or public in nature and The knowledge or disclosure of which may be of interest not only to its owner but also to a certain sector or group of people.


Sensitive Data: sensitive data is understood to be those that affect the privacy of the owner or whose improper use may generate discrimination, such as those that reveal racial or ethnic origin, political orientation, religious or philosophical convictions, membership in unions, social organizations, human rights or that promotes 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.

Responsible for the Treatment: natural or legal person, public or private, that by itself or in association with others, carry out the processing of personal data on behalf of the person responsible for the treatment

Minors: boys, girls and adolescents under 18 years of age, whose rights are prevalent with respect to the rest of the population, in accordance with article 9 of Law 1098 of 2006.

Responsible for the treatment: in this case the companies that make up the GROUP EMPRESARIAL MINEROS SA, that is, MINEROS SA, MINEROS ALUVIAL SAS and NEGOCIOS AGROFORESTALES SAS, which by themselves or in association with others, decide on the database and / or Treatment of the data.

Owner: natural person whose personal data is subject to Treatment.

	MANUAL FOR DATA MANAGEMENT PERSONAL Revised: General Secretary- Compliance Approved: Presidency	SGC-MAN-001
		Issue No. 02 Date: August 2020
		Page 7 of 18

Transfer: the data transfer takes place when the Responsible and / or Person in Charge of the processing of personal data, located in Colombia, sends the information or personal data to a recipient, who in turn is Responsible for the Treatment and is inside or outside the country.

Data transmission: processing of personal data that involves the communication of These inside or outside the territory of the Republic of Colombia when it has the purpose of carrying out a treatment by the person in charge on behalf of the person in charge.


Treatment: any operation or set of operations on personal data, such as collection, storage, use, circulation or deletion.

2. DUTIES AND OBLIGATIONS OF GRUPO EMPRESARIAL MINEROS SA

The companies that make up GRUPO EMPRESARIAL MINEROS S.A., as Data Controllers, are responsible for compliance with the following duties and obligations:

- Collect personal data relevant and adequate for the purpose for which they are collected or required in accordance with current regulations.
- Inform them of the purpose for which the data is being collected, what is going to be done with it, where it is going to be and where they can find information.
- To request the Authorization to the Data Controllers for the Processing of their Personal Data informing the specific purposes of the Processing.
- To have a communication channel that allows the holder to submit requests or communications related to his/her information
- Establish policies and procedures for handling personal data, to implement compliance with the law, as well as adopt security measures to protect the information.

As a general rule, all databases and the information contained therein is of a private nature and can only be used for natural and legitimate purposes, those who must make use of the databases have the duty to keep such information confidential and reserved. This prohibition does not include facts or acts which, according to the law, cannot be reserved by reason of their unlawfulness. The information contained in the databases may only be reproduced when there is an express or written authorization from the Holder or its assignees, or by order of a competent authority on such information.

	MANUAL FOR DATA MANAGEMENT PERSONAL Revised: General Secretary- Compliance Approved: Presidency	SGC-MAN-001
		Issue No. 02 Date: August 2020
		Page 8 of 18

The Responsible shall delete, update, rectify and disclose personal data at the request of the owner of the data, such request can be made to the corresponding email of each company of the business group.


In the event that the owner of the information initiates a claim against the information collected by the legal entities that are part of GRUPO EMPRESARIAL MINEROS S.A., the following legend "claim in process" will be established in the corresponding database. In the event that one of the companies that make up GRUPO EMPRESARIAL MINEROS S.A., is notified of a judicial process related to personal data, the following legend "information under judicial discussion" shall be established in the corresponding database, as stipulated by law.

3. RIGHTS OF THE HOLDER

The rights of the owner of the information are as follows:

- a) Know, update and rectify your personal data. These rights may be exercised, among others, against partial, inaccurate, incomplete, fractioned, misleading, or those whose processing is expressly prohibited or has not been authorized.
- b) Request proof of the authorization granted to GRUPO EMPRESARIAL MINEROS S.A., except when expressly exempted as a requirement for the Processing, in accordance with the provisions of Article 10 of Law 1581 of 2012.
- c) Be informed about the use that has been given to their personal data by GRUPO EMPRESARIAL MINEROS S.A., or the person in charge of the processing, upon request.
- d) By means of a complaint filed in accordance with Article 15 of Law 1581 of 2012, you may request the revocation of the authorization and/or request the deletion of the personal data when the processing does not respect the principles, rights and constitutional and legal guarantees or at any time provided that the holder has no legal or contractual duty to remain in the databases of GRUPO EMPRESARIAL MINEROS S.A., and in accordance with the procedure outlined in paragraph IV, of this policy.
- e) Access free of charge once a month to the personal data that have been subject to Processing.
- f) All others contained in the law.

In accordance with Article 20 of Decree 1377 of 2013, the exercise of the aforementioned rights may be exercised by the following persons:

	MANUAL FOR DATA MANAGEMENT PERSONAL Revised: General Secretary- Compliance Approved: Presidency	SGC-MAN-001
		Issue No. 02 Date: August 2020
		Page 9 of 18

- a) By the owner, who must prove his identity sufficiently by the various means made available to him by the person responsible.
- b) By their successors in title, who must prove their status as such.
- c) By the holder's representative or attorney-in-fact, upon accreditation of the representation or power of attorney.
- d) By stipulation in favor of or for another.
- e) The rights of children or adolescents shall be exercised by persons who are empowered to represent them.

4. INFORMATION PROCESSING

4.1. GENERAL TREATMENT

The databases of GRUPO EMPRESARIAL MINEROS S.A., include among other treatments the collection, storage, use, circulation, sending of communications and for the fulfillment of legal and contractual obligations with the owners of the information.


4.1.1. PROCESS



GENERAL GUIDELINES

The collection of Personal Data is done taking into account the following guidelines:

- a) Every database must have previously defined its purpose, the area responsible for the treatment, whether it is physical or virtual and the place where the database will be stored. Existing databases meet these requirements.
- b) When collecting the information, the owner must be informed of the purpose of the Database and the place where he/she can find this manual so that he/she can consult it if he/she considers it necessary.
- c) The databases will be kept in the area responsible for their custody. The digital databases will rest on a general server which has been subjected to different protection mechanisms.

	MANUAL FOR DATA MANAGEMENT PERSONAL Revised: General Secretary- Compliance Approved: Presidency	SGC-MAN-001
		Issue No. 02 Date: August 2020
		Page 10 of 18


4.2. PURPOSES

The companies that are part of GRUPO EMPRESARIAL MINEROS S.A., collect, store, use and transmit or transfer the personal data of the persons from whom it requires information, with the following general purposes:

- Execute the contracts that have been signed with one of the companies that make up the business group.
- Make payment of contractual obligations.
- Send information to governmental or judicial bodies at their express request or as a legal duty.
- Support external and internal audit processes.
- Record the information of independent consultant(s) and independent director(s) (active and inactive) in the company's databases.
- To comply with the law in the handling of the information of the employees that currently work in the company or that worked in it.
- Record supplier information (active and inactive) in the company's database.
- To comply with contractual and legal obligations of each of the entities that make up the business group.
- Collect data for the fulfillment of the duties that, as Responsible for the information and personal data, correspond to each company that makes up the business group.
- Any other purpose resulting from the development of the contract or the relationship that exists or may exist between the Holders and each legal entity that is part of the corporate group or that Colombian law determines.

5. INFORMATION SECURITY IN DATABASES OF MINEROS SA

Information security is the set of preventive and reactive measures of GRUPO EMPRESARIAL MINEROS S.A., which through the area of information technology allow to safeguard and protect the information of the digital databases seeking to maintain the confidentiality, availability and integrity of the same.

	MANUAL FOR DATA MANAGEMENT PERSONAL Revised: General Secretary- Compliance Approved: Presidency	SGC-MAN-001
		Issue No. 02 Date: August 2020
		Page 11 of 18

Based on the concepts of integrity, confidentiality and availability, several work schemes are designed to guarantee the security of the information, for its proper custody, storage and use.

There is a list of all the company's applications that must be backed up by means of *backups*, to which the following parameters are defined:


- The name of the computer on which the database is located.
- Name of the application, file, folder and/or library.
- Periodicity.
- Storage.
- Procedure.
- Responsible for executing it.
- Once the *backups* are made, the established procedure is followed for the transfer to and from the library in the cases that are defined in the *backup* table.

The confidentiality and integrity of stored data is protected by access codes and passwords that ensure that only authorized employees have access.

On the other hand, the databases that have been physically compiled are guarded by the area in charge of each database and only those persons who, due to their position and job functions, are duly authorized to do so have access to the information, with whom the appropriate confidentiality agreement has been signed for the proper handling of the information.

5.1. REPORT TO THE SUPERINTENDENCY OF INDUSTRY AND COMMERCE

When any employee of any of the companies of GRUPO EMPRESARIAL MINEROS S.A., evidences violations to the security guidelines established in this manual, shall inform the General Secretary, who shall analyze the information and, if the violation to the security guidelines is corroborated, shall inform in writing to the Superintendence of Industry and Commerce, taking the necessary steps for the proper handling of the information contained in the violated database.

	MANUAL FOR DATA MANAGEMENT PERSONAL Revised: General Secretary- Compliance Approved: Presidency	SGC-MAN-001
		Issue No. 02 Date: August 2020
		Page 12 of 17

6. TREATMENT TO WHICH THE PERSONAL DATA WILL BE SUBMITTED, IDENTIFICATION OF THE DATABASES AND PERIOD OF VALIDITY

The personal data of customers, suppliers, contractors, employees, former employees, which are hereinafter collected or that are in our databases will be treated with the following purposes:

a. **BD Aspirants.**

Type of treatment: collection, updating, conservation and transfer of personal information.

Purpose: personnel selection processes , communications.

Period of validity: duration of the process of selection and custody of resumes and results for other vacancies and future processes.

b. **BD active employees.**

Type of treatment: collection, updating, conservation and transfer of personal information.

Purpose: employment relationship, salary and social security payments, provision of services, law communications to staff. Access to welfare-to-work benefits.

Period of validity: duration of the contractual relationship and legal duty to custody of information according to the occupational health and safety management system.

c. **BD inactive employees.**

Type of treatment: collection, updating, conservation and transfer of personal information.

Purpose: custody of the information derived from the employment relationship upon its expiration, employment relationship, legal communications to retired personnel.

Period of validity: retirement of the employee and legal duty to former employees.


d. **BD access control.**

Type of treatment: collection, updating, conservation and transfer of personal information.

Purpose: control of access to the facilities of the business group to maintenance of security conditions.

Validity period: custody of access information for security reasons.

Note: GRUPO EMPRESARIAL MINEROS SA, informs all holders that the data collected directly at the security points of the administrative headquarters, buildings, branches and other facilities, which are supplied

	MANUAL FOR DATA MANAGEMENT PERSONAL Revised: General Secretary- Compliance Approved: Presidency	SGC-MAN-001
		Issue No. 02 Date: August 2020
		Page 13 of 18

in documents of security personnel, and the data obtained from video recordings made inside or outside the facilities of GRUPO EMPRESARIAL MINEROS S.A., are used for security purposes of people, goods and facilities.

e. **BD clients.**

Type of treatment: collection, updating, conservation and transfer of personal information.

Purpose: pre-contractual stage, contracting and post-contractual stage, management of procedures, analysis, evaluations, control and prevention of fraud.

Validity period: duration of the contractual relationship and legal duty.

f. **BD Suppliers.**

Type of treatment: collection, updating, conservation and transfer of personal information.

Purpose: billing, contracting, analysis, evaluations and selection of Potential suppliers and / or contractors., controls and monitoring, consultations, audits and reviews.

Period of validity: withdrawal of contact, duration of the contractual relationship and duty legal.

g. **BD stock brokers.**

Type of treatment: collection, updating, conservation and transfer of personal information.

Purpose: sending information.


Period of validity: duration of the contractual relationship.

Note: it should be clarified that the parent company Mineros SA is a public limited company which is listed on the Colombian Stock Exchange (BVC). The transaction of its shares is carried out through DECEVAL, a subsidiary of the BVC, which is responsible for the processing of shareholders' personal data. DECEVAL complies with the regulations on personal data protection, which can be consulted at the following link:

https://www.deceval.com.co/portal/page/portal/Home/Marco_Legal/ManualdePoliticasyTratamientoDeDatosPersonales/M-SC-007-Manual-de-PoliticasyTratamiento-de-datos-personales.pdf

h. **BD image bank.**

Type of treatment: collection, updating, conservation and transfer of personal information.

	MANUAL FOR DATA MANAGEMENT PERSONAL Revised: General Secretary- Compliance Approved: Presidency	SGC-MAN-001
		Issue No. 02 Date: August 2020
		Page 14 of 18

Purpose: use in advertising and / or promotional material of the company through any medium.

Period of validity: duration of the contractual relationship. Duration according to authorization for use of images.

i. **BD social management.**

Type of treatment: collection, updating, conservation and transfer of personal information.

Purpose: validity and updating of social baselines for the communities.

Period of validity: duration of the relationship with the community.

j. **BD board of directors.**

Type of treatment: collection, updating, conservation and transfer of personal information.

Purpose: sending information, sending summons, payment procedures.

Validity period: duration of appointment as a member of the board directive.


7. PROCEDURE FOR CONSULTATIONS AND CLAIMS.

GRUPO EMPRESARIAL MINEROS S.A., guarantees the right of consultation, providing the persons acting in exercise of this right, all the information contained in their individual record or that is linked to the identification of the Holder.

The person responsible for dealing with the requests in exercise of the rights by the holders will be the head of compliance of the company and / or the unit that takes its place, is who will receive, process and channel the various requests received and will send them to the respective unit responsible for treatment.

The Compliance area, once it receives these communications, will begin to comply with the function of personal data protection, so it must process the communications from the owners, in the terms, terms and conditions established by the current regulations, for the exercise of the rights of access, consultation, rectification, updating, deletion and revocation referred to in the current regulations on personal data protection.

For the attention of requests for consultation of personal data GRUPO EMPRESARIAL MINEROS S.A., guarantees that there are electronic and telephonic means of communication. The contact details for the exercise of rights are:

	MANUAL FOR DATA MANAGEMENT PERSONAL Revised: General Secretary- Compliance Approved: Presidency	SGC-MAN-001
		Issue No. 02 Date: August 2020
		Page 15 of 18

Matrix:

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NIT 890.914.525-7
Carrera 43A # 14-109, Medellín,
Antioquia.

Address: Antioquia.

Tel: (4) 266 5757

Web site: www.mineros.com.co

E-mail: gestión.datos@mineros.com.co

Controlled companies:

1. MINEROS ALUVIAL SAS

Identification data: MINEROS ALUVIAL S.A.S.,
NIT 901.218.630-6
Carrera 43A # 14-109, Medellín, Antioquia.

Address: Antioquia.

Tel: (4) 266 5757

Web site: www.mineros.com.co

E-mail: gestióndatos.aluvial@mineros.com.co

2. NEGOCIOS AGROFORESTALES SAS

Identification data: NEGOCIOS AGROFORESTALES S.A.S.,
NIT 900.349.809-5
Carrera 43A # 14-109, Medellín, Antioquia.

Address: Antioquia.


Tel: (4) 266 5757

Web site: www.mineros.com.co

E-mail: gestióndatos.agroforestal@mineros.com.co

In any case, regardless of the mechanism implemented for the attention of consultation requests, they will be answered within a maximum term of ten (10) working days from the date of receipt. In case of impossibility to attend the consultation within such term, the interested party will be informed before the expiration of ten (10) working days, stating the reasons for the delay and indicating the date on which the consultation will be attended, which in no case may exceed five (5) working days following the expiration of the first term.


Likewise, the right to claim to the databases for correction, updating or deletion, or when they notice the alleged breach of any of the duties contained in Law 1581 of 2012 and other applicable rules is guaranteed. The claim will be processed under the following rules:

	MANUAL FOR DATA MANAGEMENT PERSONAL Revised: General Secretary- Compliance Approved: Presidency	SGC-MAN-001
		Issue No. 02 Date: August 2020
		Page 16 of 18

- a) If the claim received does not have complete information that allows it to be processed, such as the identification of the owner, the description of the facts giving rise to the claim, the address, and accompanying documents that want to assert, the claimant will be required within five (5) days of receipt to correct the faults. After two (2) months from the date of the request without the applicant submitting the required information, it will be understood that the claim has been withdrawn.
- b) If for any circumstance one of the companies that make up GRUPO EMPRESARIAL MINEROS S.A., receives a complaint addressed to another organization, it shall transfer the complaint to the appropriate party within a maximum term of two (2) business days and inform the claimant of the situation.
- c) Once the claim is received in full, it shall be included in the database maintained by GRUPO EMPRESARIAL MINEROS S.A., a mention that says "claim in process" and the reason for the same, within a term not exceeding two (2) business days. Such legend shall be maintained until the claim is decided.
- d) The maximum term to address the claim will be fifteen (15) working days from the day following the date of receipt. When it is not possible to attend it within said term, the interested party will be informed before the expiration of said term the reasons for the delay and the date on which the claim will be attended, which in no case may exceed eight (8) working days following the expiration of the first term.

The special rules for the exercise of the rights of the owners are: the request for rectification, updating or deletion must be submitted through the means enabled by GRUPO EMPRESARIAL MINEROS S.A., indicated in the privacy notice and in this document, and must contain, at least, the following information:

- a) The name, address of the owner and means of contact to receive the response such as telephone, email and home address.
- b) Documents proving the identity or representation of your proxy.
- c) The clear and precise description of the personal data in respect of which the holder seeks to exercise any of the rights.
- d) If necessary, other elements or documents that facilitate the location of the personal data.
- e) GRUPO EMPRESARIAL MINEROS S.A., has the obligation to rectify and update, at the request of the holder, any information about him/her that may be incomplete or inaccurate, in accordance with the procedure and terms indicated above.

	MANUAL FOR DATA MANAGEMENT PERSONAL Revised: General Secretary- Compliance Approved: Presidency	SGC-MAN-001
		Issue No. 02 Date: August 2020
		Page 17 of 18

Data Suppression. The owner has the right, at all times, to request the GROUP EMPRESARIAL MINEROS SA, or any of the legal entities that comprise it, the deletion (elimination) of your personal data when:

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


This suppression implies the total or partial elimination of the personal information according to the holder's request in the records, files, databases or processing carried out by GRUPO EMPRESARIAL MINEROS S.A. The holder must warn that the right of cancellation is not absolute and the responsible may deny the exercise of the same when:

- a) The request for deletion of information will not proceed when the holder has a legal or contractual duty to remain in the database.
- b) The deletion of data hinders judicial or administrative proceedings related to tax obligations, the investigation and prosecution of crimes or the updating of administrative sanctions.
- c) The data are necessary to protect the legally protected interests of the owner; to carry out an action in the public interest, or to comply with an obligation legally acquired by the owner.

In the event that the cancellation of personal data is appropriate, the companies that make up GRUPO EMPRESARIAL MINEROS S.A., must carry out the deletion in such a way that the elimination does not allow the recovery of the information.

8. NATIONAL OR INTERNATIONAL TRANSFER OR TRANSMISSION OF PERSONAL DATA.

The companies that make up GRUPO EMPRESARIAL MINEROS S.A., as responsible for the personal information stored in their databases and in the development of the purposes described in this document, may carry out national or international transfer or transmission of data.

	MANUAL FOR DATA MANAGEMENT PERSONAL Revised: General Secretary- Compliance Approved: Presidency	SGC-MAN-001
		Issue No. 02 Date: August 2020
		Page 18 of 18

GRUPO EMPRESARIAL MINEROS S.A., is committed to verify the level of protection and security standards of the country receiving the personal information, make the declaration of conformity (when applicable) and sign a transfer contract or other legal instrument that guarantees the protection of personal data subject to transfer.

By virtue of this exchange relationship, GRUPO EMPRESARIAL MINEROS S.A., has adopted several guidelines for the relationship with third parties, in order to protect the information object of this activity.

Such transfer of personal data is made only to third parties with whom GRUPO EMPRESARIAL MINEROS S.A., has contractual, commercial and / or legal relationship.

9. VALIDITY AND UPDATING OF THE POLICIES.

This Manual and the data processing policy will be effective from the date of publication on the website and internal media of the company.



ANDRÉS RESTREPO ISAZA
Legal representative
MINEROS SA

SANTIAGO CARDONA MÚNERA
Vice President Colombia
MINEROS ALUVIAL SAS
NEGOCIOS AGROFORESTALES SAS